

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

OBADA MZAIK,

Plaintiff,

v.

SYRIAN ARAB REPUBLIC,

Defendant.

Case No. 1:22-cv-00042-EGS

Complaint for Torture,
28 U.S.C. § 1605A

DECLARATION OF MAHMOUD HAMOUD

I, Mahmoud Hamoud, declare as follows:

Personal Background

1. I am 28 years old and I have personal knowledge of the facts set forth in this Declaration.
If called as a witness, I would testify competently to such facts under oath.
2. I was born on 31 May 1995 in Syria.
3. I am a Syrian citizen originally from Moadamiyeh, a suburb of Damascus, Syria which is less than two miles from the Air Force Intelligence Branch at the Mezzeh Military Airport.
4. I now reside in France.
5. I speak Arabic, French and English fluently.

Arrest and Transfer to Air Force Intelligence Branches

6. At the start of the Syrian uprising in 2011, I went out on the streets of my neighborhood in Moadamiyeh to film the anti-government protests. I was 16 years old at the time.

7. During one of these protests, on 1 August, 2012, I recorded an attack by Syrian government forces on civilian protesters on my phone camera. At the time, many similar videos documenting the excessive use of force by Syrian government forces against civilian protesters were circulating. I later submitted the footage to a social media account popular with those who opposed the Syrian regime. International media outlets later reshared the video.
8. In August 2012, I left Syria because the government was bombarding the city and I traveled to Jordan, where I remained until the fall of 2012.
9. On 14 October 2012, I returned to Damascus, which I thought was safer at the time. I was 17 years old and still a minor. As I crossed into Syria, border guards asked me where I was from. The moment I responded, “Moadamiyeh,” they arrested me without explanation. I believe everyone from Moadamiyeh was viewed with suspicion by the officials because the area was known as a center of opposition protests to the Assad regime.
10. I was transferred from the border to Suweida, a city just south of Damascus, by border guards.
11. From 15 October to 18 October 2012, I was held at the Air Force Intelligence Branch in Suweida, where I was interrogated twice, and asked where the Free Syrian Army held weapons in Moadamiyeh and for names of contacts.

Detention at the Air Force Intelligence Branch at the Mezzeh Military Airport
(October 2012 – November 2014)

12. On 18 October 2012, I was blindfolded and transferred by Air Force Intelligence officers to the Air Force Intelligence branch in Al-Abbasyeen in Damascus. Immediately, I was

told that I was wanted for investigation by the Air Force Intelligence Branch at the Mezzeh Military Airport (“AFI Mezzeh”).

13. I knew I was being transferred to AFI Mezzeh because I overheard Air Force Intelligence guards and could see under the blindfold where I was being taken. I later confirmed that I was detained at AFI Mezzeh through my own observations.
14. Ultimately, I was detained at AFI Mezzeh from October 2012 until November 2014 (with a three-month transfer to the Air Force Intelligence Branch detention center in Umayyad Square from July 2013 to October 2013). My parents were never told where I was while I was detained in AFI prisons. I still had not finished high school at the time.
15. Over my approximately two years of detention at AFI Mezzeh, I developed a knowledge of the physical layout of the detention center complex.
16. I would come to learn that there is an “Old Prison” and a “New Prison” at AFI Mezzeh, so named because of when they were built relative to one another, just a few minutes walking distance from each other. I would be detained in both the Old and New Prisons at AFI Mezzeh multiple times between October 2012 and November 2014.
17. In **Exhibit A**, I have indicated where the Old and New Prisons of AFI Mezzeh are located using a Google Earth satellite image from 2014. I am certain of the location I indicated for the New Prison on the map. I think the location I provided for the Old Prison is also correct, though I am not as fully confident as I am as regards the New Prison location.
18. Upon my arrival at AFI Mezzeh in October 2012, I was locked in Cell 12 of the Old Prison, a one-story building within the AFI Mezzeh detention complex. Attached as **Exhibit B** is a diagram of the floor where I was held in the Old Prison.

19. About 15 days after my arrival at the Old Prison of AFI Mezzeh, I was transferred, along with all the detainees on my floor of the Old Prison, to the New Prison—a three-story building within the AFI Mezzeh detention complex. Guards later told me that the top floor was only for offices of AFI officers. From approximately November 2012 to about mid-December 2012, I was held on the ground floor of the New Prison.
20. Around mid-December 2012, I was transferred to a cell on the basement floor of the New Prison, where I was held until approximately June 2013.
21. In or about June 2013, I was transferred to an open-air cell in an underground courtyard of the New Prison, where I was held until 17 July 2013.

*Transfer to the Air Force Intelligence Branch in the Ummayyad Square in Damascus
(July 2013 – October 2013)*

22. On 17 July 2013, I was transferred out of Mezzeh’s New Prison to the AFI branch in the Ummayyad Square in Damascus. I assume this meant the “investigation” of my case was over, because detainees from AFI Mezzeh were often transferred to other prisons once their investigation was complete.
23. There was no light in the entire prison and there were 70 or 75 other prisoners in my cell. I knew from what other prisoners in the branch told me and the fact that there were never any interrogations, that detainees were brought here to die. I thought this was where my life was ending.

Return to AFI Mezzeh and Recruitment as a Sokhra Worker

24. On or around 15 October 2013, I was transferred back to AFI Mezzeh to the Old Prison in Cell 3, where I was held until December 2013, when all the detainees of the Old Prison, were again transferred to the New Prison. I’m not sure of the reason for the transfer but I later overheard the guards say that there was construction at the Old Prison.

25. In December 2013, I was transferred to a ground floor cell in the New Prison.
26. On 12 January 2014, after about one month in the New Prison, I was fingerprinted about 16 times while blindfolded – I was told the prints were used to “authenticate” everything I had (falsely) confessed to. Then, I was moved to a bigger cell on the ground floor with about 70 or 75 other detainees.
27. On 3 March 2014, an officer came to me and asked if I knew how to cut hair. I later learned that one of the other detainees mentioned my name when the officers were looking for another prisoner to deliver food to detainees, clean the rooms and give the guards haircuts. This small group of prisoners, all of whom were kept in a separate cell, where known as *Sokhra* workers.
28. It was understood by everyone that “questions” by officers were actually demands. They moved me to Cell 1 on the ground floor where the other *Sokhra* workers were held. Attached as **Exhibit C** is a diagram of the ground floor of the New Prison.
29. Conditions on the ground floor were slightly better than in the basement floor—we received a little more food and the cells were slightly warmer. The cell door was usually kept open so we could move in and out to do our jobs. The only times we were locked inside were when officers announced they were moving female detainee through the hallway.
30. In addition to cutting hair, the officers tasked me with cleaning of the interrogation rooms. While cleaning the rooms, I saw a paper taped to the corner of a table. The paper was a list of officers’ and guards’ names, their military title, and what seemed to be an extension number for each. I have reproduced and translated this list in **Exhibit D**.

31. In **Exhibit E**, I've drawn a diagram of the general hierarchy of the New Prison officers and guards as I came to understand it from conversations with guards and officers and the interactions I personally observed between them.
32. Despite the better cell conditions, I was miserable working as a *Sokhra* worker. It made me feel low and dirty, because I knew they chose the weakest and youngest of the prisoners for the job, thinking we posed no threat to them and could be easily controlled. But not long after I turned 19, I resolved to remember as much as I could—especially names and dates—so that one day, this information could be used to hold accountable the people who did this us.
33. Over the next few months, I slowly memorized every word on the paper taped in the interrogation rooms. Each time I cleaned one of the interrogation rooms, I could only glance at it. If I was caught looking closely, I feared I would be killed. This mission to memorize this list helped me find meaning in through my detention and torture. And I would keep reinforcing those names and the dates of my detentions across branches until my final release years later. Still today, I think back on these details to hold on to them.

Detention, Interrogation and Torture at AFI Mezzeh

34. A few days after my arrival at AFI Mezzeh, while detained at the Old Prison, I was forced to sign what I assume was a confession while blindfolded; this was just the first of many false confessions I was forced to sign. At one point during my detention in the Old Prison, guards hung me up by my wrists against a wall in a common torture position known as *Shabah*.
35. About 15 days after signing the confession, I was moved to the New Prison of AFI Mezzeh, where I would be held in various cells for most of the next two years.

36. The layout of the cells on the ground floor and basement floor of the New Prison were generally the same. Most of the cells measured about 1.9 meters by 1.2 meters and held 16 or 17 detainees each. The only light source was a small window in each cell very high up, about 4 meters from the ground.
37. None of us had clothes other than underwear. There were no blankets. The winters were brutally cold. Ticks and other insects caused rashes, tuberculosis and sores in almost everyone. Sometimes officers would bring the very sick a pill which they said was aspirin. I was so sick that I soiled myself.
38. Guards often took me to the courtyard for interrogations and beatings. They would beat my leg more than 100 times sometimes. This happened many times.
39. During one interrogation, the officer, Investigator Muhammad al-Khalaf, asked if I raped anyone. Even though I had “confessed” to whatever they wanted from me until this point, I couldn’t falsely confess to this. When I refused, which was the first time I had rejected a false confession, they electrocuted me.
40. During my time at AFI Mezzeh, investigation of detainees was conducted every day and always with torture. Particularly when I worked as a *Sokhra*, I witnessed so much torture: with pipes, with electricity, burning with cigarettes and hot water. Much of this torture was carried out in the hallway where I could see it. I was not allowed in the investigation rooms beyond cleaning but I could also hear torture in the investigation rooms, which took place every day, many times a day.
41. The constant sounds of screams from torture were horrific. I think that this environment was created intentionally by the AFI officers and guards to sow perpetual fear in the detainees.

42. While I have not included Jamil Hassan's name in Exhibit D or E given that I don't believe I ever personally saw Jamil Hassan I want to note the following. At some point in 2013, one of my fellow detainees was sent to see Jamil Hassan, who I understand was the head of the Air Force Intelligence at the time. When the detainee returned to us after his visit to Jamil Hassan, the detainee was no longer able to walk because of the torture he had received. The detainee told us that Jamil Hassan had ordered the guards to torture him.

Women Detainees at AFI Mezzeh

43. Near the kitchen and the hallway where us *Sokhra* spent time in the New Prison, was a windowless cell where a woman and her two children were held, which is marked as 3 in Exhibit C. I never saw them as anytime women on the floor were moved through the hall, the guards would lock us in our cell, but from what I could hear, it sounded like she had a very small baby; the other child might have been around 10 years old. I heard the cries of the baby and mother regularly. Sometimes I would bring tampons to that cell. Other times, I brought milk for the woman and children.

44. Other *Sokhra* workers who I overlapped with at the beginning, told me that the same woman had been detained there since before they arrived so she must have been held in that cell for at least two years. It is possible, I suppose, that the baby was born in the cell. The woman and children were still there when I was transferred out of the prison.

45. Wassim Safi was the officer who did all the interrogations of women detainees. Although I rarely saw any women, I knew women were being detained and interrogated in the New Prison because I could hear them being tortured during investigations, including screaming and the clear sounds of beatings.

Detention in Sednaya Prison
(18 November 2014 – 3 April 2015)

46. In the last few months of my detention in AFI Mezzeh, I started to have a friendly relationship with one of the guards. He was the least brutal of the guards. One night in November 2014, he told me that I would be transferred to Sednaya Prison the next day. I was frozen with shock. Everyone knew that being sent to Sednaya meant being sent your death. I was taken to the underground floor in the New Prison for a few days in preparation for my transfer. On 18 November 2014, I began my transfer to Sednaya. I never learned why any of these decisions were made.
47. I was first transported to a secretive military court and was brought before what I thought was a real judge. I started telling him the truth—that I was just a 17-year-old kid filming protests. He angrily looked at the (false) confessions I signed in AFI Mezzeh, tore up my passport, and threw it at me. That was the only court I ever entered in Syria. The appearance lasted two minutes. The judge ordered me transferred to Sednaya.
48. It's hard to explain how dehumanizing Sednaya is. My first four days there, I was held in a cell with 14 other men, all of us stripped completely naked. I was held without food and water for four straight days before being moved to a cell with 35 other men. We were given uniforms but the conditions were hardly better. On average, one person in my cell would die every day. When only 10 or 11 of us were left out of the 35, they combined us with the survivors from another cell to get our number back up to 35. Then one of us would die each day. This cycle continued for the 5 months I was detained in Sednaya.
49. For those months, my thoughts and emotions only cycled between profound hunger, thirst, and terror. The horror of watching a person die of thirst in front of you is a memory that will never leave me.

50. At AFI Mezzeh, the constant sounds of screams from torture were horrific, but the profound and permanent silence of Sednaya is somehow worse. Twenty-three hours of unbroken silence would only be interrupted by a daily call to report the number on each floor who didn't survive the night. I know from these death roll calls that about 30 to 50 prisoners died every night. That our own government did this to us—overseeing the systematic withering away of our bodies in silence—it leaves you with a sense of horror and insecurity in the world that follows you for the rest of your life.

**Detention in Al-Balooni Prison & Adra Central Prison
(April 2015 – May 2016)**

51. I was certain my life would end in Sednaya, but on 3 April 2015, what felt like a miracle at the time, happened—I was transferred to a prison in Homs known as al-Balooni. There couldn't have been a starker difference in conditions. Even the guards at al-Balooni were shocked at our emaciated condition. In al-Balooni we were permitted cigarettes and could contact our families. That's where I was able to finally contact my family for the first time in more than 3 years.

52. Attached as **Exhibit F** is a picture of me at Al-Balooni, more than a year after I was transferred from Sednaya. I was 21 years old when the photo was taken and weighed around 50 kilograms (110 pounds).

53. In May 2016, I was transferred to Adra Prison, which is a civilian prison. There, I was detained for three and a half years. During that time, I earned my high school diploma. I also met an American, Sam Goodwin, who was also detained in Adra.

Release and Refuge in France

54. On 31 October 2019, I was ordered released from Adra Prison and from the Syrian detention system for good—more than 7 years after I was first arrested at the border as a

- 17-year-old. I was held for an additional few days by the Military Police, who took me to a Syrian military recruitment office. They wanted me to serve my now overdue military service for the same regime that imprisoned and tortured me for the past seven years.
55. I was finally released on 3 November 2019. Attached as **Exhibit G** is a copy of a document I was given by Syrian authorities that documents my detention and requires me to report for military service at a later date.
56. I fled to Lebanon in early December 2019, where I kept a low profile because I feared pro-Regime elements, including Hezbollah, would find me and send me back to Syria.
57. While I was in Lebanon, I also learned that Syrian Military Intelligence was looking for me in Syria and asking my neighbors about my whereabouts.
58. In December 2020, I filed a visa application to France, where I had family.
59. I now live in France. French doctors diagnosed me with tuberculosis, which I must have contracted while in detention. The pain was immobilizing, but I successfully completed my treatment for the infection in January 2022.

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

Executed in France on 03/04, 2024.



Mahmoud Hamoud

EXHIBIT B

Drawing done by Witness Depicting Floor Layout in the "Old Prison" at AFI Mezzeh

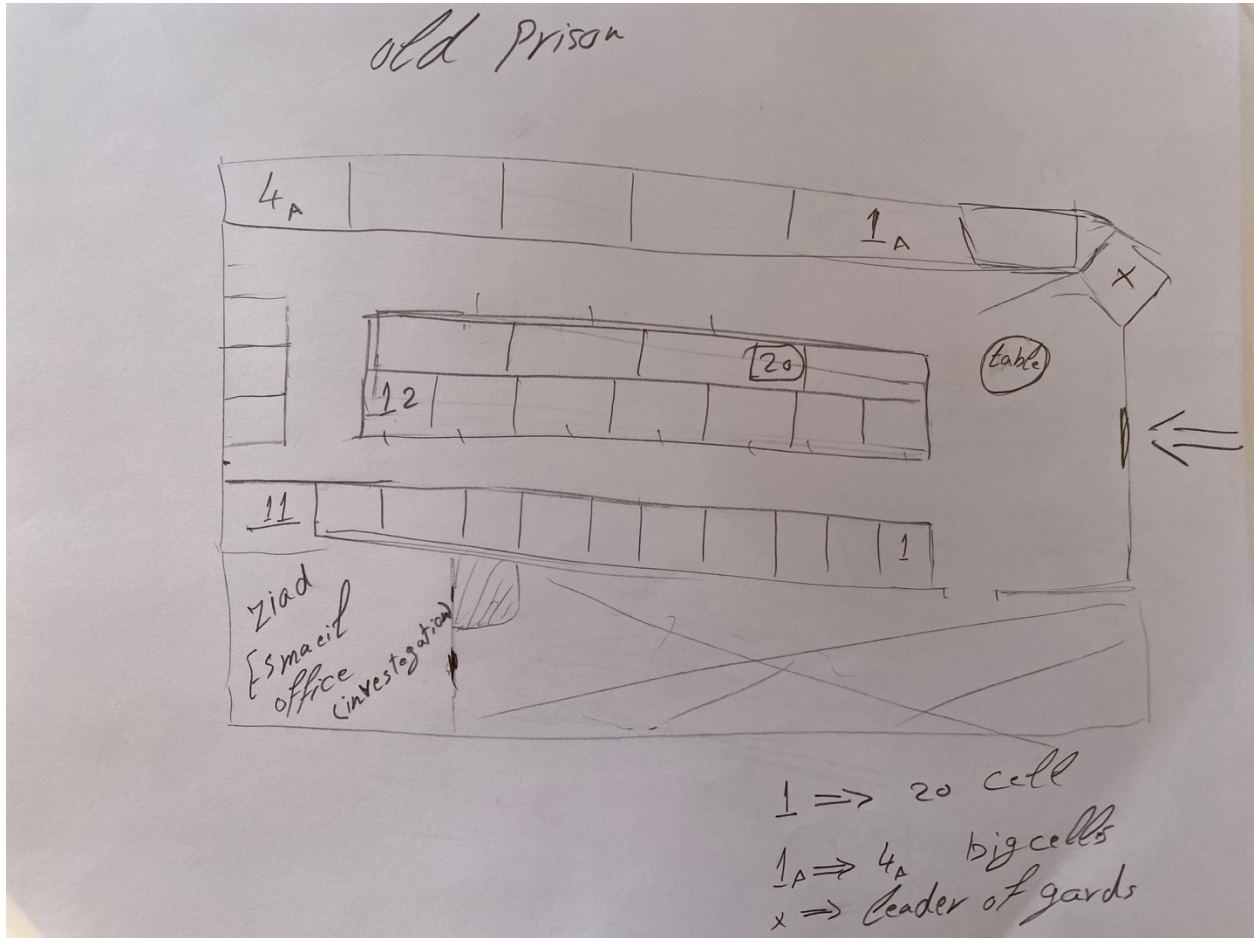
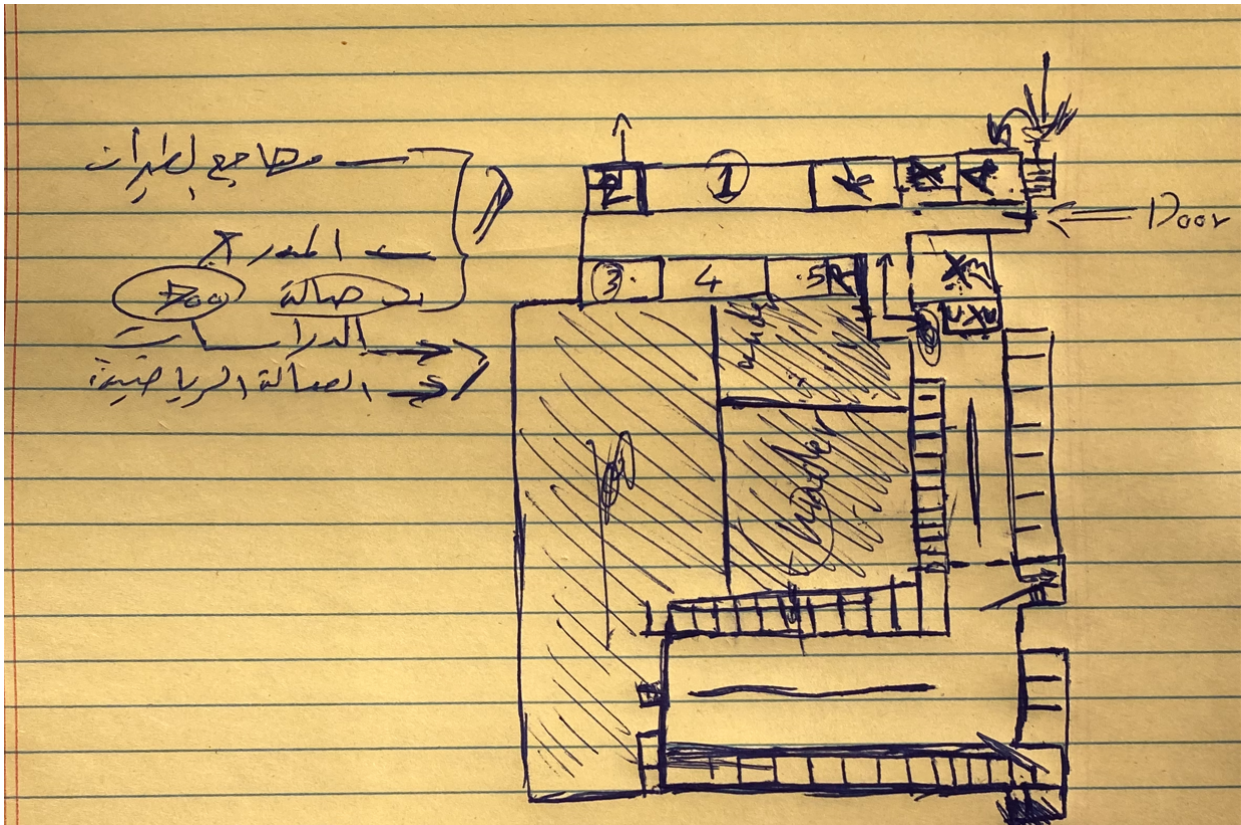


EXHIBIT C

Drawing done by Witness Depicting Floor Layout on the Ground Floor of the
“New Prison” at AFI Mezzeh



Legend:

A – First Assistant’s Office (head of the guards)

X – Another interrogation room

K – Prison Kitchen

1 – Large Cell #1

2 – Large Cell #2

3 – Large Cell #3

4 – Large Cell #4

5 – Large Cell #5

The *Sokrha cell* is the top cell on the left of the vertical hallway, indicated by a small “1”

R – Overnight guards’ rest cell

Xb – Largest Interrogation room (often used for multiple interrogations)

Xc – Officers’ Office where computers and communication devices were held

Arabic translation of text: The courtyards and large rooms were called “*Mahajae al-Tayyaran*,” “al-Mudaraj,” “*Salat Suba’ameyah* (The 700 room—where 700 detainees were held), “*salah riayadiyeh*” and “*al-Dirasat*”—where they conduct interrogations. (This is the note written in Arabic next to the diagram although they are not labeled on the diagram.)

EXHIBIT D

The following is the list of names, titles, and other identifying information that I saw listed in multiple interrogation rooms in the New Prison of the Air Force Intelligence Mezzeh Branch, Investigations Department in 2014. What follows is my translation from the original Arabic, which follows below.

Officers:

- Lieutenant Colonel Ziad Ismail, Head of Investigation Department
- Major Tariq Suleiman
- Major Ra'ed Da'aboul
- Captain Moatez Suleiman
- Captain Wassim Safi
- First Lieutenant Yazan Jahjah
- Lieutenant Colonel Sohail Zammam, Head of Prison Affairs (responsible for feeding and caring for detainees)
- First Assistant (Investigator) Abdullah Al-Hafiz from Aleppo*
- First Assistant (Investigator) Muhammad Al-Khalaf from Deir Ezzor (The investigator who interrogated the witness)*

* Neither officers nor guards

Guards:

- Staff Sergeant Louay Al-Ali
- Corporal Ali Al-Ahmad
- Staff Sergeant Khalil Zina
- First Sergeant Ali Aqel (from Baniyas, Tartous)
- Ahmed Al-A'asi, Assistant, from Deir Ezzor
- Sergeant Abd Al-Kareem Al-Asa'ad, Assistant
- Sergeant, Suleiman Al-Ali
- Iskander Alia, Assistant (from Tartous)
- Corporal Ali A'qool
- First Sergeant Muhammad Al-Ahmed (from Masyaf, Hama)

* المقدم زياد اسماعيل رئيس قسم التحقيق

* الرائد طارق سليمان

* الرائد: رائد دعبول

* النقيب معتز سليمان

* النقيب وسيم صافي

* الملازم اول يزن ججاج

* المقدم سهيل زمام. رئيس شؤون السجن (هو المسؤول عن اطعام ورعاية المعتقلين)

* المساعد اول (محقق) عبدالله الحافظ من حلب

* المساعد اول محمد الخلف من دير الزور (محقق _ المحقق تبعي)

السجائين

* لؤي العلي... رقيب اول
* علي الاحمد... عريف
* خليل زينه... رقيب اول
* علي عاقل... رقيب اول .طرطوس بانياس
* احمد العاصي... مساعد..دير الزور
* عبد الكريم الاسعد..مساعد..مصيف حماه
* سليمان العلي... رقيب
* اسكندر عليا...مساعد..طرطوس
* علي عقول... عريف
* محمد الاحمد.. رقيب اول..مصيف حماه

EXHIBIT E

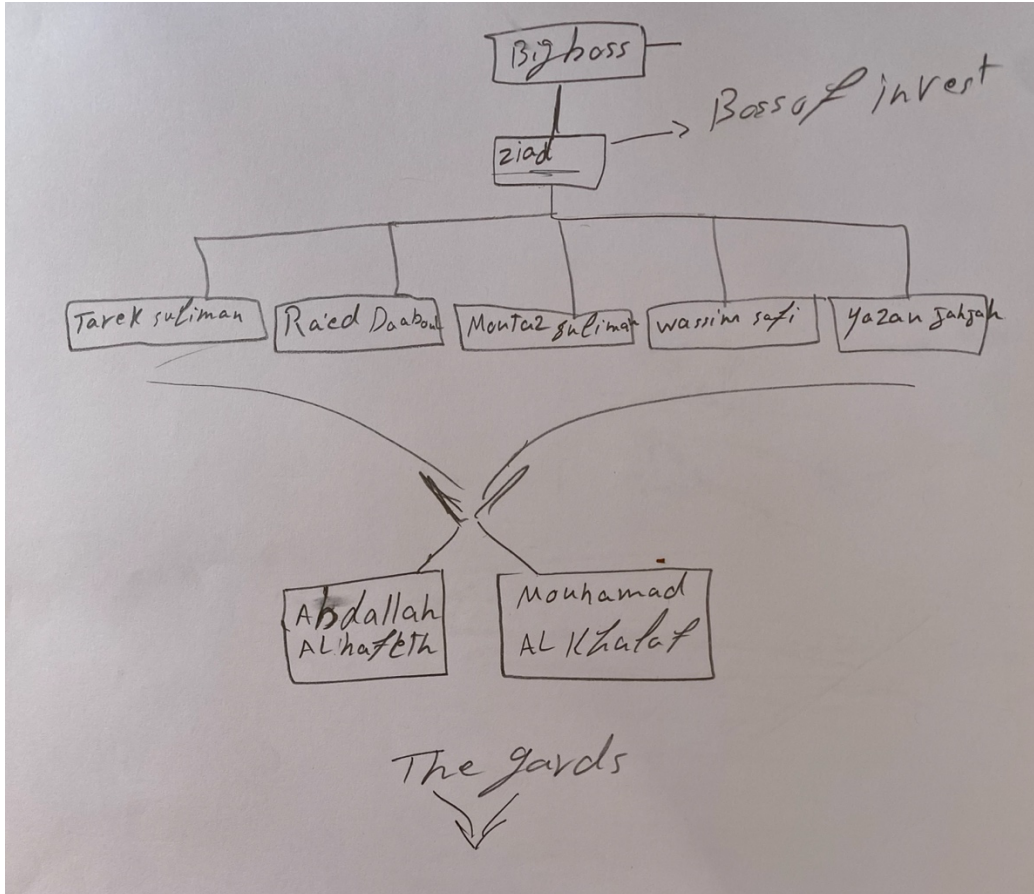


EXHIBIT F

Photo of Witness at Al-Balooni Prison



EXHIBIT G

الجمهورية العربية السورية
 القيادة العامة للجيش والقوات المسلحة
 إدارة القضاء العسكري
 النيابة العامة العسكرية - دمشق - التقنين
 الرقم / ٦٦٢٤
 التاريخ ١١ / ١١ / ٢٠١٩ م

إلى: مكتب تنفيذ المظنة الجوية

لذلك الرجوع إلى سجلاتنا التنفيذية بشأن أن المرحوم
 محمود جمال الكوثر في الوقت من مصادره كولد ١٩٩٥ وارتب
 موصوفته من اجلكم من قبل محكمة الميدان العسكرية في ذلك
 بالمر كولد رقم ٢٦٥٩ / ١١ / ٢٠١٩ م / ١٩٥٥١ / ١١ / ١٩٥٥
 في ١٤ / ١١ / ٢٠١٩ م بحسب الفأمة في حال لهاسسة اعطيت الى
 صوت ليزان والام عليه في حال ذلك بالتحسين لتفسير
 لعملة الشاعرة خسة عملة المادة ١٩٦٩ / ١١ / ٢٠١٩ م
 الجاهدين رقم ١٨ / ١١ / ١٩٦٩ م وقد بلاتته في ذلك
 طوية من تاريخ ١٨ / ١١ / ٢٠١٩ م وتاريخه ١٩ / ١١ / ٢٠١٩ م
 اجمالا تلك في وقت المنكوب الحول في حوزة حوزة لعملة
 رقم ١٩ / ١١ / ٢٠١٩ م لصحح العقوبة الوالدة المنقصة هي ثمان
 سنوات وتاريخه ٢٠ / ١١ / ٢٠١٩ م صنع المنكوب بتاريخه في كبل
 محكمة الميدان العسكري في موليبة القوا المكون رقم ٢٠٥٥ / ١١ / ٢٠١٩ م
 ٢٦٥٩ م كذا الى ضمن رصعة المدون لارتقاء سبله وبناء على ذلك
 المنكوب اعطى هذا الترخيص

رئيس النيابة العامة العسكرية دمشق







١٨١
٥٧٤١١

السيد العميد رئيس فرع سجن دمشق المركزي

مقدمه: محمد جبريل السيد ولدني بصرى قيد سجن دمشق المركزي

المال: طلب إثبات وجود

الموضوع: سيدي

أرجو إعطائي بيان توقيف ((إثبات وجود)) عن الدعوى الموقوف فيها حالياً في سجن دمشق المركزي وذلك لتقديمه إلى الجهات المختصة.

النزيل

بصم بحضوري أنا أحمد محمد جبريل

بتاريخ ٢٠١٩/١٠/٤

إلى المهيمه السيده العسكريه ..

نبين لكم بأن السجين محمد جبريل السيد هو حالياً نزيل سجن دمشق المركزي

بموجب ملكة حكمهم رقم ٤٤٥ الصادرة عن محكمة بتاريخ ٢٠١٤/١٤/٤ بحرم السجن .. باعتبار .. أفضت .. سنة ..
شاملاً حجز حريته من تاريخ ١٨ / ١٠ / ٢٠١٤

يرجى الاطلاع

رئيس فرع سجن دمشق المركزي

محمد

ورقة ذات قيمة: ٢٥ خمس وعشرون ليرة سورية