

**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 YAMAN AL-QADRI**

I, Yaman al-Qadri, declare as follows:

**Personal Background**

1. 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 30 April 1993 in Syria.
3. I am a dual Syrian-Canadian citizen who currently resides in the United Kingdom, where I work as a clinical psychologist.
4. I speak Arabic and English fluently.

**November 2011 Arrest at the University**

5. In 2011, at the start of the uprising, I was a first-year student at the Faculty of Medicine at Damascus University (“University”) and lived in Mar Elias Monastery in Damascus.

6. After the start of the anti-regime protests in 2011, peaceful protests began to take place on campus. As a result, the campus became more securitized.
7. For example, before 2011, guards were not stationed at the gates of the University. Following the protests in 2011, guards in khaki uniforms were deployed to check students' identifications. In addition, CCTV cameras were installed around the campus. I believe the CCTV camera were installed to monitor students rather than to ensure their safety.
8. In particular, the National Union of Syrian Students ("NUSS") played an integral role in monitoring and helping to arrest students who were seen as opposed to the regime. While I did not see members of the security forces inside the campus, NUSS members beat students on behalf of the security forces, both on campus and in the student residence, which was across the street from the campus. Some of the NUSS members carried weapons on campus. My understanding is that NUSS members had the authority to check identifications, beat, or arrest students who were perceived to be opponents of the regime and had "carte blanche" to do so.
9. At the time, I had heard that most of the students who were arrested on campus by NUSS members were then handed over and taken to the Air Force Intelligence branch ("AFI").
10. In October 2011, I and three male fellow students prepared a large quantity of colored pamphlets with phrases in support of the anti-regime protests, which we brought in our backpacks to the University. We went into a laboratory that was not in use and threw the pamphlets from the window over the main yard of the Faculty of Medicine. The pamphlets were dispersed everywhere on the ground. We went down, took some photos

and videos and left the campus. I later learned that members of the NUSS came and collected all the pamphlets.

11. I was later informed by a friend who had infiltrated the NUSS and alerted students if they were being investigated by the NUSS that a CCTV camera had recorded us while we were at the University with the pamphlets, so I stopped going to the University for a while and changed my residence for fear of arrest. When nothing happened, I eventually resumed going to the University, though I made sure to always be accompanied by a friend so that someone would be with me if I got arrested.
12. On November 2, 2011, about a week after I resumed going to the University, there was a protest at the University that I attended while covering my head to conceal my identity. This protest, like other protests at the time, was very short. Students would gather and someone would start shouting some anti-regime slogans. The whole thing would take about 20 seconds before individuals in plain clothes, who were armed with metal chains or other similar instruments, came to assault and disperse the protesters.
13. Following the protest, students recommended on Facebook groups that no one attend University the following day. I was not aware of this warning at the time and attended my anatomy class as scheduled on November 3, 2011.
14. After my class, as a friend and I were walking across the campus, Ashraf Saleh, a prominent NUSS member, and two women stopped us. Ashraf Saleh ordered me to follow him.
15. Ashraf Saleh and the women took me to a security guard room at the entrance of the University. I was beaten by the two women and Ashraf Saleh while in the room.

16. From the University, I was taken to the AFI branch in Harasta. Here, I was questioned by the head of the AFI Interrogation Department in Harasta. During the interrogation I was asked about my participation in protests and electrocuted with a taser multiple times. After the interrogation, I was returned to a small, solitary cell and told to write details about my life on the provided paper. I began to weep and feel the pain of the tasing.
17. I wrote the names of relatives I thought would not be connected with the anti-regime protests and who would not be implicated. As I wrote, I could hear the voices of detainees in adjacent cells trying to calm me or weeping with me.
18. Sometime after midnight, I was told a relative was coming to get me, but I was actually being transferred from the AFI branch in Harasta to the AFI branch at Mezzeh Military Airport (“AFI Mezzeh”). I was blindfolded during transit and did not know where I was being taken until after my arrival. I was detained at AFI Mezzeh for 23 days until November 26, 2011.

**Detention at the Air Force Intelligence Branch at the Mezzeh Military Airport**  
(November 3, 2011 – November 26, 2011)

*My Detention, Interrogation and Torture at AFI Mezzeh*

19. Upon arrival at AFI Mezzeh, my bag and personal items were confiscated, I was fingerprinted, and my mugshots were taken. I was then held in a small, dirty, aboveground cell between two interrogation rooms. There was just enough space in the room to lie down. I remained in this room for the entirety of my time at AFI Mezzeh. There were a few blankets and a broken chair inside. I was never taken to the underground cells where other detainees were held.
20. I was interrogated on many occasions at AFI Mezzeh. On three occasions, I was interrogated by Abdulsalam Mahmoud, a senior AFI officer. These interrogations were

held in Abdulsalam Mahmoud's large office in a nicer part of AFI Mezzeh. Other interrogations were conducted by other AFI officials in smaller rooms near my cell.

21. My primary interrogator at AFI Mezzeh was named Manaf. I was taken to his office above my cell for interrogations. In Manaf's office, there would often be a third person recording the interrogation by hand. I believe the written information was typed up in a computer room at the branch and passed on to others.
22. During the first few days of my detention, I was blindfolded and handcuffed for interrogation sessions. Interrogators would threaten me. They would try to humiliate me and call me names like cockroach, coward, and dog. They told me I would never return to my studies or be a student again.
23. On the second day of my detention at AFI Mezzeh, I was interrogated. The interrogator taunted me with a taser. He turned it on so I could hear the sound, but I could not see the taser because of my blindfold. He did not use the taser against my body, but I was so afraid that my body trembled. This interrogation lasted multiple hours; I cannot remember the exact amount of time.
24. During another interrogation session, I was blindfolded and brought into an interrogation room. I sat down and another person was led into the room. I could not see the other person apart from his feet, but I could tell from his feet and voice that it was Ammar Yahya, one of the other students who prepared the pamphlets with me. I could also tell from the condition of Ammar's feet that he had been detained for a while and tortured.
25. The interrogator questioned Ammar about the nature of his relationship with me. I felt like the interrogator wanted me to hear what Ammar had said about me in another session.

26. Ammar blamed me for the pamphlets and made our relationship seem like a romantic one. He said horrible things about me and fabricated information. I was upset by the encounter, but I understood that Ammar was lying to protect himself and his family. Ammar and I did not remain in contact after our respective releases from detention. Our encounter at AFI Mezzeh severed a previously deep friendship. It had a strong lasting emotional impact on me.
27. In later interrogation sessions at AFI Mezzeh, I was not blindfolded or handcuffed. Interrogators would ask me questions aimed at understanding why I disagreed with the regime and why I distributed the pamphlets on campus. They asked who was funding me and who I was affiliated with. I believe the change in my treatment was due to the media attention my arrest garnered. I did not learn the full extent of this attention until after my release.
28. Interrogators would also ask me about my family. Particularly, they knew my father had been detained in the 1980s and pushed the narrative that he had poisoned me against the regime. I denied any influence from my father or other family members. I was terrified that they would detain and torture my family members because of me. To protect my family, I told interrogators that I was misinformed about the current regime, and that this misinformation is what led to my participation in protests.
29. During my detention at AFI Mezzeh, a guard named Sami was assigned to guard me. He went by the name Sam. He would bring me my meals, the same food provided to soldiers, and escort me to interrogations.
30. I developed a strange relationship with Sam. He was interested in me romantically and helped me while I was detained. Sam gave me news from the outside and he helped me

contact my mother to let her know where I was. Due to this help, I did not feel like I could completely turn down Sam's advances, but he made me uncomfortable, and I disliked him. I repeatedly told him that we could "talk" after my release.

31. Sam took advantage of opportunities to make physical contact with me. When I was about to be interrogated, he would hug me tightly as if he were comforting me. I felt disgusted when Sam touched me. It was such a violation of my dignity but I did not feel like I could let him know this at the time. After my release, I heard stories of other female detainees experiencing similar uncomfortable relationships with guards.

*Conditions of Detention at AFI Mezzeh*

32. The blankets in my cell were infested with bugs that eventually moved to my clothes and gave me a persistent skin rash all over my body. After approximately ten days of detention, my rash was noticed, and I was told to bathe for the first time. I bathed in the room to the right of my cell. An interrogator named Anwar typically resided in this room. I estimate I bathed three times during my three-week detention, once directly before my release. The rash remained and had to be treated after I was released.
33. While at AFI Mezzeh, I had my period. Sam brought me pads, which I took as a favor he was doing for me. There were no indications that guards would otherwise provide me with any feminine hygiene products.

*Witnessing the Interrogation and Torture of Other Detainees at AFI Mezzeh*

34. The location of my cell at Mezzeh, between two interrogation rooms, allowed me to hear the interrogation and torture of other detainees that took place in those rooms. An interrogator named Anwar resided in the interrogation room to the right of my cell, and I believe an interrogator named Tareq resided in the interrogation room to the left of my

cell. The interrogation of other detainees began in the evening and went into the early morning.

35. Almost every night, I heard beating, shouting, cursing, and humiliation from these interrogation rooms. Once, I heard a taser and then the sound of a man's body hitting the door in Anwar's room while begging soldiers to stop. I often heard detainees falling and hitting the wall shared with my cell during their interrogation and torture. I believe the interrogations were random and aimed at humiliating and intimidating detainees, rather than extracting meaningful information.
36. The first night I spent at AFI Mezzeh, I could not sleep because of the sounds from the other rooms. I stuffed my ears with tissues and put my hood over my head to try to block out the noise of the torture.
37. Sometimes, I saw the treatment of detainees through a small broken window in my room or through the crack under my door. Once, I saw a man kneeling with his head down and his hands and legs tied. He was there for hours while soldiers moved him around and treated him like an animal.
38. On a different day, I saw another man who was blindfolded with his hands tied. The guards were giving him military orders to walk left and right. They asked him to tell them what he did sexually to his wife and then they humiliated him by describing what they would do to her.
39. On another occasion, I witnessed a group of people brought in front of my room on a cold night. They were told to take off their clothes. Then, they were made to stand in the cold for a long time while a guard cursed and humiliated them.



40. Hearing these encounters was often more difficult than experiencing my own interrogations. On multiple occasions, I begged the soldiers to stop. I was so terrified that I had trouble eating and sleeping. The experience was very upsetting and very difficult. I knew that they were capable of doing anything to me because I heard what they did to others. There was no safe place or person to turn to, and I didn't know if it would ever end. Much of the pain I experienced was psychological as well as physical.
41. During the first few weeks after I was released, I would wake up from dreams not knowing where I was. It was a very scary feeling. I continued to feel psychologically broken after my release until I left the country.

*Impact on My Family*

42. After about ten days at AFI Mezzeh, Sam, the guard who helped me, told me my mother was looking for me. My parents learned of my arrest through Al-Jazeera reporting. My mother returned from Saudi Arabia to Damascus to look for me. My father searched the names of those reported killed for my name every day.
43. When my mother heard of my arrest she went into shock. She opened the door and nearly jumped out of a moving car. In the following weeks, she lost 10 kilograms (about 20 pounds) and turned very pale.
44. Someone at the University told my mother I had been taken to "Mezzeh". She came to inquire after me but was told (incorrectly) that I was not at AFI Mezzeh. This is how Sam learned she was looking for me. I begged Sam to get in contact with her and tell her where I was.
45. Approximately two weeks after my arrest, Sam got in contact with my mother. I was allowed to secretly speak to her on Sam's phone for about two minutes. The first time we

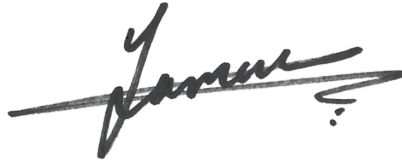
spoke, I was panicked, and I regret losing control. I told my mother not to pay money to anyone for my release. I was worried that my family would be blackmailed.

*Release from AFI Mezzeh*

46. On November 26, 2011, I was released from AFI Mezzeh. I later learned that my family had tried many different avenues to secure my release, including reaching out to the wife of Abdulsalam Mahmoud, the senior AFI officer who had twice interrogated me, speaking to the Syrian ambassador in Saudi Arabia, trying to make payments to any individuals affiliated with the Syrian intelligence services, and writing a letter to President Assad asking for my release. I do not know which, if any, of these attempts resulted in my release.
47. Prior to being released, I was interrogated a third time by Abdulsalam Mahmoud with my mother and cousin present. In this interrogation, Abdulsalam Mahmoud subtly told me that I should report back to the AFI with information on anti-regime activities. He also made it seem like I would continue to be monitored.
48. After my final interrogation with Abdulsalam Mahmoud, my personal effects were returned to me, and I left the branch with my mother and cousin. I left Syria for Saudi Arabia two days after my release.
49. I learned after my release that my mother had also seen Jamil Hassan, the head of AFI, on a day she was visiting AFI Mezzeh to try and secure my release. Hassan asked my mother if she was the mother of the student who dispersed the pamphlets. My mother said Hassan was intimidating.

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 the United Kingdom on 21 November, 2024.

A handwritten signature in black ink, appearing to read 'Yaman al-Qadri', written over a horizontal line.

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Yaman al-Qadri