

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF COLUMBIA**

OBADA MZAIK,

*Plaintiff,*

v.

SYRIAN ARAB REPUBLIC,

*Defendant.*

Civil No. 1:22-cv-00042-ACR

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

**EXPERT REPORT OF JABER BAKER AND UĞUR ÜMIT ÜNGÖR**

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## PRELIMINARY INFORMATION

1. We, Jaber Baker and Uğur Ümit Üngör, have been retained as expert witnesses by Plaintiff Obada Mzaik in *Mzaik v. Syrian Arab Republic*, Case No. 1:22-cv-00042-ACR, to provide our expert opinion regarding the Syrian detention system and its state-sanctioned use of torture, including by the Air Force Intelligence at the Mezzeh Military Airport detention complex, where Plaintiff was held.
2. Our qualifications, the evidentiary basis for our opinion, and a summary of opinions are set forth in greater detail below.

### Qualifications

3. We are co-authors of the book *SYRIAN GULAG: INSIDE ASSAD’S PRISON SYSTEM* (Bloomsbury Publishing Plc, 2023),<sup>1</sup> from which we draw many of the opinions contained in this expert report (“Report”).
4. Jaber Baker is a novelist, researcher, former political prisoner and human rights activist. He is one of the founders of the Laboratory for the Study of Violence in Syria, which specializes in in-depth research into the study of local and systemic violence in Syria. In addition to co-authoring *SYRIAN GULAG*, he has produced several political novels in Arabic, including *601:THE DIVINE TRIALS* (2017) and *BAB AL-FARADIS – MISSING MESSAGES FOR GUILAN DAMASCENE* (2020). He is a senior researcher responsible for the Syrian file at the Samir Kasir Eyes (Skeyes) Center for Media and Cultural Freedom. His resume is attached as **Exhibit A**, which includes a list of all his publications authored in the previous ten years. He has not served as an expert in any depositions or at trial before U.S. courts.
5. Uğur Ümit Üngör received his Ph.D. in 2009 (cum laude) from the University of Amsterdam. He now serves as Professor of Holocaust and Genocide Studies at the University of Amsterdam and the *Nederlands Instituut voor Oorlogsdocumentatie* (NIOD) Institute for War, Holocaust, and Genocide Studies. He has received several awards for his work, including the Heineken Young Scientists Award for History in 2012 from the Royal Netherlands Academy of Sciences. He is editor of the *Journal of Perpetrator Research and H-Genocide*, and coordinator of the Syrian Oral History Project at NIOD. His resume is attached as **Exhibit B**, which includes a list of all his publications authored in the previous ten years. He has not served as an expert in any depositions or at trial before U.S. courts.

### Compensation

6. We are not being compensated for this Report or for our expert testimony. We will be reimbursed for reasonable expenses incurred while fulfilling our role as experts. Our opinion is not conditioned upon any payment.

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<sup>1</sup> This book was first published in Dutch as *DE SYRISCHE GOELAG: DE GEVANGENISSEN VAN ASSAD, 1970-2020* (Boom Uitgevers Amsterdam 2022).

## Basis for Opinion

7. In preparing this Report, we relied on our personal knowledge, expertise, and documents related to the above-captioned case, including the Complaint and Declaration of Obada Mzaik.
8. The conclusions in this Report are informed by the research we carried out in conjunction with our work on SYRIAN GULAG, which rests on five types of sources.
9. First and foremost, SYRIAN GULAG relies heavily on oral histories of survivors and eyewitnesses. We conducted over 100 interviews with former detainees, eyewitnesses, family members of detainees, and perpetrators. In 2021, these interviews were archived at the NIOD Institute for War, Holocaust, and Genocide Studies.
10. Second, we used a number of reports published by international and non-governmental organizations, such as Human Rights Watch, Amnesty International, the Syrian Network for Human Rights, the Association of Detainees and Missing in Sednaya Prison, EuroMed Rights, the International Center for Transitional Justice, the Office of the United Nations High Commissioner for Human Rights, Physicians for Human Rights, Pax for Peace, the Syria Justice and Accountability Center, the Commission for International Justice and Accountability, the International Commission on Missing Persons, Families for Freedom, the European Center for Constitutional and Human Rights, and others.
11. A third type of source that has proven very useful is internal records of the Syrian regime. Due to the secrecy of the regime and its strict censorship of the prison system, leaked internal records are an important source of information. Additionally, in August 2013, a photographer for the Syrian military police, code-named ‘Caesar’, defected and smuggled 53,275 photographs out of Syria. The photos show at least 6,786 detainees who died while imprisoned by the intelligence branches. Caesar’s job was to document the dead, from those killed in traffic accidents to individuals who died as a result of military attacks. As of 2011, he was largely tasked with photographing the bodies of those who died in Syrian government detention centers. The photos are horrific: they are close-up shots of dead victims bearing marks of torture. The emaciated bodies are black and blue. There are marks of whipping, beating, and strangulation. Some bodies have their eyes gouged out. These individuals had not only been tortured; they had been executed through torture. The Caesar photos provided, for the first time, visual evidence of the brutality of the Syrian gulag and confirmed what survivors and eyewitnesses had long reported.<sup>2</sup>
12. A fourth repository of primary materials emanated from an unexpected source. From 1975 to 2015, Dutch immigration lawyer Pieter Bogaers took up the cases of almost 800 refugees who fled to the Netherlands in that period. Among these refugees were about forty Syrians of all walks of life: Communists, Islamists, liberals, Kurds, and regime insiders who sought asylum in the Netherlands. In 2015, Bogaers donated

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<sup>2</sup> The photos were taken between May 2011 and August 2012 and represent only those that Caesar had access to and are thus only a subset of all deaths in detention over that period. In the photos, many of the bodies are accompanied by a marker identifying a detainee number, death or medical-examination number, and the intelligence branch where the victim was detained. Bodies marked with the letter “ج” (the first letter of “Air Force” in Arabic) meant that the body had come from AFI.

records from his cases to the International Institute of Social History in Amsterdam and we are grateful that he granted us permission to conduct research in the files. His archive has proven a vital source of survivor narratives for the period before the Syrian uprising.

13. Our fifth source type is also sensitive: published and unpublished accounts by former detainees that detail their experiences while in detention.
14. The list of materials referred to and cited in this Report are listed in **Exhibit C**.

## **SUMMARY OF OPINIONS**

15. Our report provides context for understanding Plaintiff's detention and the harms inflicted on him by the Air Force Intelligence ("AFI") at the Mezzeh Military Airport, where he was detained. Plaintiff's detention and torture is far from an isolated experience. Instead, it is characteristic of the Assad regime's concerted strategy following the 2011 uprisings to suppress perceived opponents through the systematic use of detention, interrogation and torture. Our Report outlines the following conclusions:
  16. First, the Assad family, which has ruled Syria since 1971, has long utilized the Syrian detention system to maintain power.
  17. Second, following the 2011 uprising in Syria, the regime of Bashar al-Assad relied extensively on Syrian intelligence agencies and their sprawling network of detention centers to implement a nationwide strategy to repress protesters and perceived opponents to its authoritarian rule.
  18. Third, integral to the Assad regime's strategy was the widespread and systematic use of interrogation and torture in these detention centers, including by AFI at the Mezzeh Military Airport, where Plaintiff was held.
  19. Fourth, the Assad regime's repressive strategy of mass imprisonment and torture, which continues to this day, caused a profound, irreversible, and indelible impact on millions of Syrians.

## **FINDINGS**

### **A. Introduction: Political Context**

20. The Syrian Arab Republic ("Syria"), is a country located in the Eastern Mediterranean and Levant regions of West Asia. It is bordered by the Mediterranean Sea to the west, Türkiye to the north, Iraq to the east and southeast, Jordan to the south, and Israel and Lebanon to the southwest.
21. Syria is nominally a constitutional republic, but since the 1970s it has functioned as a single-party dictatorship under the rule of the Assad family and its Arab Socialist Ba'ath Party. Hafez al-Bashar ruled Syria from 1971 to 2000. He was succeeded by his

son, Bashar al-Assad, who continues to rule as President of Syria and head of the Ba'ath Party.

22. The Syrian Constitution grants Bashar al-Assad, as President, near-unchecked power, including the power to appoint and remove the prime minister, dissolve the legislature, and pass laws when the legislature is dissolved or not in session.<sup>3</sup> Syria reformed its constitution in 2012, injecting a superficial plurality into the Syrian political system. But in reality, the Assad regime continues to enjoy a stranglehold on Syria's political, military, and security apparatus, including its intelligence agencies.
23. In March 2011, popular protests swept across Syria, inspired by the Arab Spring movement and by the arrest of fifteen school children in the City of Daraa.<sup>4</sup> Protestors took to the streets calling for political reform and were quickly met with violence and repression. By June 2011, the Assad regime had killed hundreds of protestors and arbitrarily arrested thousands more.<sup>5</sup>
24. The Assad regime responded to popular protests with military violence, mass arrests, and a brutal expansion of its security apparatus. In 2012, the United States Department of State reported that the Assad regime had regularly opened fire on protestors; engaged in countrywide attacks on civilian populations; denied food, water, and medical services to civilian populations; targeted activists and their families; "disappeared", tortured, abused, raped, and arbitrarily arrested political dissidents; and systemically repressed Syrian press and civil society.<sup>6</sup> Since then, the Assad regime's brutal campaign against Syrian civilians has been extensively documented by the United Nation's Independent International Commission of Inquiry on the Syrian Arab Republic (the "COI on Syria"), which was established in August 2011 by the United Nations Human Rights Council to investigate all alleged violations of international human rights law since March 2011 in Syria, as well as by Syrian and international human rights organizations.
25. Integral to the Assad regime's repressive strategy was the widespread and systematic arbitrary detention, interrogation, and torture of civilians in the regime's detention centers. Starting in March 2011, the four intelligence agencies—Air Force Intelligence, Military Intelligence, General Intelligence, and the Political Security Administration (collectively referred to as the "*Mukhabarat*")—each operating its own sprawling nationwide network of detention centers, dramatically accelerated the arbitrary arrest and torture of thousands of Syrians as part of the regime's coordinated response to the protests.

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<sup>3</sup> Constitution of the Syrian Arab Republic Feb. 26, 2012 art. 97, 111, 113. Article 113(1) of the constitution also gives the president the power to pass laws when the legislature is in session, "if absolute necessity requires" that he do so.

<sup>4</sup> Human Rights Watch, "*We've Never Seen Such Horror*": Crimes Against Humanity by Syrian Security Forces (2011), <https://www.hrw.org/report/2011/06/01/weve-never-seen-such-horror/crimes-against-humanity-syrian-security-forces>.

<sup>5</sup> *Id.*

<sup>6</sup> US Dep't of State, Bureau of Democracy, H.R. and Lab., Syria 2012 Human Rights Report 1-3, 7, 9, 19, 37 (2012).

**B. The Syrian detention system has long been used by intelligence agencies to detain and torture those perceived to oppose the Assad regime, and to suppress their activities.**

The Syrian Detention System in Context

26. To provide a sense of perspective of the unparalleled scope of the Syrian gulag, it is useful to sketch a broad overview of imprisonment worldwide. As of 2024, approximately 11 million people were imprisoned across the world. The highest absolute numbers are in the United States (1.8 million), China (1.7 million excluding a million Uyghurs in camps), Brazil (840,000), and India (573,000). The countries with the highest prison population rate (the number of prisoners per 100,000 of the population) are El Salvador (1,086), Cuba (794), Rwanda (637), Turkmenistan (576), American Samoa (538), and the United States (531).<sup>7</sup> The global average is 140 prisoners per 100,000 of the population.<sup>8</sup>
27. Estimates vary as to the total number of prisoners in Syria. Even if we use the conservative estimate of 300,000 Syrians having been in detention at some point since 2011 (including those who died in prison), it would amount to about 1,200 prisoners per 100,000 of the population,<sup>9</sup> the highest per capita rate of incarceration in the world.
28. The current situation of violent state repression in Syria is of an unprecedented scale in contemporary Syrian history: never before have so many people been arrested, imprisoned, tortured, and killed in detention as in the past half century in general, and the past decade in particular.<sup>10</sup> The violence is of such a degree and nature that it poses a threat to the viability and stability of Syrian society. It generates pervasive fear, collective trauma, economic stagnation, sectarian polarization, stifling of talent, persistent injustice, and prevention of alternative futures for the country.
29. The Soviet Union coined the term ‘gulag’, short for Glavnoe Upravlenie Lagerei (‘Chief Administration of Camps’), to refer to a vast network of camps, prisons, transit centers, secret police, informers, spies, interrogators, torturers, and executioners.<sup>11</sup> It is entirely appropriate to use the same term for the Syrian detention system, which was similarly set up to eliminate the regime’s perceived political enemies. The Syrian

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<sup>7</sup> Helen Fair & Roy Walmsley, Inst. for Crim. Pol’y Rsch., *World Prison Population List 2* (Apr. 2024).

<sup>8</sup> *Id.*

<sup>9</sup> This figure is based on a combination of published statistics by various Syrian human rights organizations and informed extrapolation. It includes people who were in detention also for a very short period. The highest number given for this period is by the Syrian Network for Human Rights (SNHR) (1.2 million), but the SNHR does not explain exactly how this figure is reached. Syrian Network for Human Rights, *Ninth Annual Report on Torture in Syria on the International Day in Support of Victims of Torture 9* (June 26, 2020).

<sup>10</sup> Salwa Ismail quotes memoirs to place this ratio at approximately one in every thousand Syrian citizens: 14,000 prisoners out of 10 million Syrians in 1984. SALWA ISMAIL, *THE RULE OF VIOLENCE: SUBJECTIVITY, MEMORY AND GOVERNMENT IN SYRIA* 38 (2018).

<sup>11</sup> One of the first major reports on torture in Syrian prisons alluded to the Soviet Gulag in its title: Human Rights Watch, *Torture Archipelago: Arbitrary Arrests, Torture, and Enforced Disappearances in Syria’s Underground Prisons since March 2011* (Jul. 3, 2012). Beyond analogy, considering that the KGB trained the Mukhabarat in the 1970s and 1980s, there are very direct transfers of knowledge and practice between the Soviet Union and Baathist Syria. GERD LINDE, *DIE SOWJETISCH-SYRISCHEN BEZIEHUNGEN IM REGIONALEN UMFELD* 3-8 (1982).

detention system, too, forms an archipelago across a country with a wide carceral geography, has an inordinate impact on the society on which it operates, and has similar levels of lethality.

30. Long-time Soviet gulag prisoner Anatoly Marchenko opened his memoirs with a passage that might symbolize one of the most important parallels between the two detention systems. Marchenko writes that every time he felt seized by despair, hunger, illness, and helplessness, “one thing alone gave me the strength to live through that nightmare: the hope that I would eventually come out and tell the whole world what I had seen and experienced.”<sup>12</sup> Every single Syrian ex-detainee we have spoken to expressed this exact same deep desire.

### The Syrian Intelligence Agencies

31. The four Syrian intelligence agencies – Air Force Intelligence, Military Intelligence, General Intelligence, and the Political Security Administration (collectively referred to as the “Mukhabarat”) – are the backbone of the security apparatus that allows the Assad regime to maintain its grip on power.
32. The Syrian intelligence agencies are under the command and tight control of the Syrian President. The Syrian regime asserts that the Syrian Constitution delegates authority over the entire security sector, including the intelligence agencies, to the Syrian President. The President is the Supreme Commander of the Army and the Armed Forces and is, at the same time, the State Secretary of the ruling Ba’ath Party. He appoints the director of the National Security Bureau – the highest security authority in the country – and appoints the heads of the intelligence agencies. He also appoints the Prime Minister and the president of the Supreme Court. The concentration of executive authority means that the Syrian President is nearly omnipotent in overseeing the security sector, including its intelligence agencies.
33. The main function of all the Syrian intelligence agencies since 1970 has been to protect the Assad regime from internal threats to its rule. To do so the intelligence agencies can operate outside the usual checks and balances that would typically govern their activities in a functioning democracy. The only red line these agencies cannot cross is the position of the President.
34. The reach of the Syrian intelligence agencies is extensive. At the beginning of the Syrian Revolution in 2011, there were about 65,000 full-time employees and several hundred thousand part-time employees in the various Syrian intelligence services. Each of the intelligence agencies also operates its own sprawling network of detention centers.
35. The intelligence agencies’ networks of detention centers were integral to the Assad regime’s strategy to carry out widescale repression against perceived opponents to its rule. In its July 2023 report, the Syria COI stated:

The Commission has previously documented that Government forces have committed torture and ill-treatment on a massive scale since 2011. This was

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<sup>12</sup> ANATOLY MARCHENKO, MY TESTIMONY 23 (1989).



- part of the Government’s widespread or systematic attack against the civilian population, in pursuance of an established policy to commit such acts, comprising the crimes against humanity of murder, extermination, imprisonment, enforced disappearance, torture, rape and sexual violence, and other inhumane acts. Such acts occurred in multiple places of detention throughout the country, controlled by Government forces, including intelligence directorates (also called security agencies), civilian and military police.<sup>13</sup>
36. For the purposes of this Report, we focus on the detention centers operated by the Air Force Intelligence, and notably the Air Force Intelligence’s complex at the Mezzeh Military Airport, where Plaintiff was held.

#### Air Force Intelligence

37. AFI is considered the intelligence directorate that is the most loyal to the Assad regime. With the lowest percentage of non-Alawite operatives and officers among intelligence directorates, it is considered one of the most sectarian intelligence departments.
38. From 1963 to 1987, Major General al-Khouli served as the first Director of AFI. After securing power in 1970, Hafez al-Assad utilized AFI, through Major General al-Khouli, to carry out security operations against his opponents. al-Khouli arrested supporters of perceived rival, Salah Jadid, across the ruling Ba’athist party, army, and government ministries. Hafez al-Assad gave al-Khouli eight hours to carry out the mission; he did it in two.<sup>14</sup> After al-Khouli, Major General Ibrahim Hawija lead AFI until 2002, followed by Major General Izzaddeen Ismail (2002-2005), and Major General Abdel Fattah Qudsiyah (2005-2009).
39. Major General Jamil al-Hassan (2009-2019) headed AFI while Plaintiff was held at the Mezzeh Military Airport. Since then, AFI has been headed by Major General Ghassan Jawdat Ismail (2019-2024), and most recently by Major General Qahtan Khalil.
40. Structurally, AFI divides Syria into five regions with a major branch in each.<sup>15</sup> These regional branches control several sub-branches in the major cities of each region.
41. In addition to the five regional branches, AFI has six branches in Damascus, Syria’s capital, including AFI’s complex at the Mezzeh Military Airport (“AFI Mezzeh complex”), where Plaintiff was held.
42. The AFI Mezzeh complex houses Assad’s presidential plane, as well as numerous AFI facilities, including the Studies Branch (*Dirasat*), the Operations Branch, the

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<sup>13</sup> Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, “*No End in Sight*”: *Torture and ill-treatment in the Syrian Arab Republic 2020-2023*, U.N. Doc. A/HRC/53/CRP.5 (Jul. 10, 2023).

<sup>14</sup> PATRICK SEALE, *ASAD: THE STRUGGLE FOR THE MIDDLE EAST* 268 (1989).

<sup>15</sup> The Regional branches are as follows: The Southern Region branch covers the governorates of Deraa, Quneitra, Suwayda, Damascus and its countryside, and is based in Damascus. The Central Region branch covers Homs and Hama and is based in Homs. The Northern Region branch covers Aleppo and Idlib and is based in Aleppo. The Eastern Province branch covers Deir Ezzor, Raqqa and Hasakah and is based in the city of Deir Ezzor. The Coastal Region branch covers Latakia and Tartus and is based in the city of Latakia.

Special Tasks Branch (also known as the Special Operations Branch), and the Investigations Branch, which was led by Brigadier Abdul Salam Mahmoud at the time of Plaintiff's detention.

43. Following the 2011 uprising, there was a surge in the number of detainees transferred to and held at the AFI Mezzeh complex. In addition to the "Old Prison", additional large-scale detention facilities were created within the AFI Mezzeh complex, including the "New Prison." Airport buildings, including airplane hangars, were also repurposed as detention facilities.

#### Arrest and Transfer to the AFI Mezzeh Complex

44. In his Declaration, Plaintiff recounts how in the summer of 2011, he fled the escalating repression in Syria and returned to the United States, where he held citizenship, to continue his collegiate studies.<sup>16</sup> In early January 2012, Plaintiff returned to Syria to visit his family and was immediately arrested upon presenting his U.S. passport and Syrian national identification card at customs and immigration at the Damascus International Airport.<sup>17</sup>
45. He was then transferred across multiple security branches, including the Criminal Security Branch in the Baramkhah neighborhood of Damascus and the Political Security Administration in the al-Fahmah neighborhood of Damascus, before ultimately being transferred to the Air Force Intelligence complex at the Mezzeh Military Airport on January 10, 2012.<sup>18</sup>
46. While in detention he was repeatedly accused of being a traitor and brutalized in an attempt to obtain confessions to supposed anti-regime activities.<sup>19</sup> To secure Plaintiff's release, Plaintiff's family was forced to bribe Air Force Intelligence officials and assure them that Plaintiff would not engage in further anti-regime activities.<sup>20</sup>
47. Our research demonstrates that Plaintiff's arrest and detention for perceived anti-regime activities is characteristic of the Assad regime's repressive strategy following the 2011 protests. As demonstrations spread, the regime's extensive intelligence network not only carried out widespread arrests and violent crackdowns but also spearheaded efforts to detain, torture, and execute countless Syrians. AFI branches routinely detained large numbers of protesters and individuals on wanted lists, including prominent figures like lawyer and rights activist Thamer Al-Jahmani.<sup>21</sup> Human Rights Watch examined hundreds of arrests in carried out by intelligence agencies in 2012 and concluded: "To manage the thousands of people detained in the context of anti-government demonstrations, the authorities also established numerous

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<sup>16</sup> Declaration of Obada Mzaik ("Mzaik Decl.") ¶¶ 1–4.

<sup>17</sup> *Id.* ¶¶ 6–7.

<sup>18</sup> *Id.* ¶¶ 9, 11, 16.

<sup>19</sup> *See, e.g., id.* ¶¶ 27, 32.

<sup>20</sup> *Id.* ¶¶ 45, 47.

<sup>21</sup> SYRIAN GULAG (Thamer al-Jahmani, interview).

temporary unofficial holding centres in places such as stadiums, military bases, schools, and hospitals where the authorities rounded up and held people during massive detention campaigns before transporting them to branches of the intelligence agencies.”<sup>22</sup>

48. Similarly, Plaintiff’s transfer across various security services and ultimate detention at the AFI Mezzeh complex also parallels how the various intelligence services have worked together to detain, interrogate and torture Syrians on a large scale since 2011. The AFI Mezzeh complex in particular has been one of the most notable detention sites run by the intelligence services. After the start of the Syrian Revolution, the AFI Mezzeh complex was extensively repurposed, with aircraft hangars converted into prison spaces to accommodate the influx of detainees. This complex symbolized the regime’s ability to reconfigure state structures to meet its objectives, often holding detainees for extended periods under severe conditions. New underground facilities were set up specifically as the Revolution began, introducing harsher and more isolating conditions than before. Mezzeh became infamous not only for its role in centralizing detainees from across Syria but also for the brutal treatment administered by AFI agents.
49. While in detention, Plaintiff met detainees who had been transferred to the AFI Mezzeh complex after being detained at other AFI branches.<sup>23</sup> In our own research, we found that AFI used military airfields to transport detainees from distant provinces to AFI Mezzeh. Air Force helicopters transported detainees from Deir ez-Zor in the east of the country, Aleppo and Idlib in the north, and Latakia and Tartous on the Mediterranean coast. The aircraft delivered the detainees to the AFI Mezzeh complex, which, along with the rest of the AFI branches in Damascus, was converted into a long-term detention facility.
50. Many witnesses recount being transported to the AFI Mezzeh complex on military aircraft. One detainee we interviewed was flown from Aleppo’s al-Nayrab military airport with several detainees coming from Deir ez-Zor to Mezzeh airport. He recounted:

The aircraft landed in Mezzeh at night on 21 March 2012. Air Force Intelligence operatives climbed onto the plane and welcomed us with beating. We were taken to a bus where we remained for two hours doing nothing but receiving more strikes and blows. The bus moved for a few minutes then stopped. We offboarded the bus to a gravel ground. The strong lighting turned night into day. Then a security operative

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<sup>22</sup> Human Rights Watch, *supra* note 11; *see also* Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, ¶ 25, U.N. Doc. A/HRC/46/55 (Mar. 11, 2021) (“Former officers of the Syrian intelligence apparatus have described how torture and ill-treatment against detainees was systematic and involved high-ranking officers. Any arrest, detention or release of detainees in a given security branch required the approval of the head of directorate. Likewise, all deaths of detainees were reported to the head of agency.”).

<sup>23</sup> Mzaik Decl. ¶ 10.

confronted me saying [in an Alawite accent]: ‘Do you know where you are?’ I said I didn’t. He said: ‘You’re in hell . . . and we are the angels of torment.’<sup>24</sup>

**C. Following the 2011 uprising, the widespread and systematic use of interrogation and torture in Syrian detention centers was integral to the implementation of the Assad regime’s repressive strategy to suppress perceived opposition.**

Interrogation and Torture at the AFI Mezzeh Complex

51. In his Declaration, Plaintiff describes the treatment he experienced at the AFI Mezzeh complex, including being whipped with a hose, beaten with a PVC pipe on his palms and the soles of his feet, punched in the face hundreds of times, and pummeled with kicks.<sup>25</sup> He was stripped naked, threatened with electrocution and told that he would be hung by his handcuffed wrists.<sup>26</sup> He was also subjected to relentless threats in an effort to extract information about his supposed anti-regime activities. Plaintiff also witnessed the torture of other detainees, including that of his cousin, who was hung by his bound and brutalized wrists, and he constantly heard the sounds of individuals being tortured.<sup>27</sup>
52. The torture methods described by the Plaintiff are consistent with the practices documented through our research, and are also corroborated by the Syria COI, human rights organizations, and the statements of former detainees, among others.<sup>28</sup> Although the number of detainees at the AFI Mezzeh complex dramatically increased starting in 2011, many of the methods of torture described by former detainees remained the same. The following are some of the methods most frequently experienced by detainees in AFI detention centers, including those held at the AFI Mezzeh complex.
53. Detainees arriving at the AFI Mezzeh complex were met with a customary “welcome party,” in which guards and officials carried out aggressive beatings of newly registered detainees in courtyards and hallways—sometimes for up to three days.<sup>29</sup> This was only

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<sup>24</sup> SYRIAN GULAG (Muhannad al-Ghobash, interview).

<sup>25</sup> Mzaik Decl. ¶¶ 21, 28–29.

<sup>26</sup> *Id.* ¶¶ 21, 27, 34.

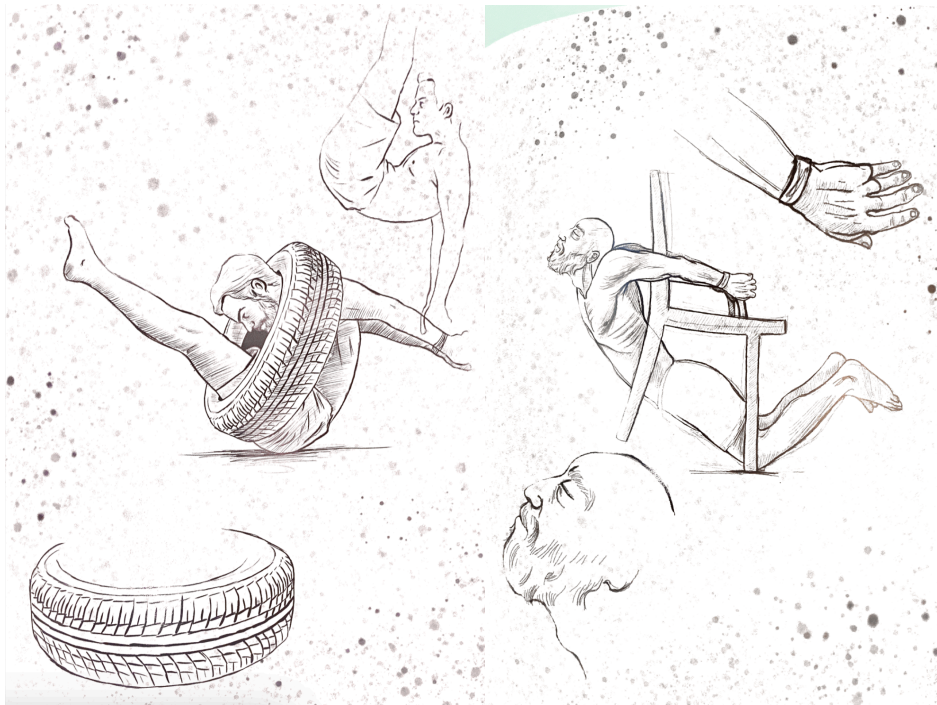
<sup>27</sup> *Id.* ¶¶ 34, 37.

<sup>28</sup> The Syrian COI has documented a large variety of torture methods used across security force detention facilities, including at Mezzeh Airport. In their March 2021 report, they recorded “at least 20 different horrific methods of torture used by the Government.” Human Rights Council, *supra* note 22, at ¶ 20. *See* also Syrian COI finding that “Survivors of [AFI Mezzeh] recounted daily torture sessions. Detainees were brought back to their cells by the guards with open wounds, swollen limbs, haemorrhaging and left without medical care. When they died, the bodies would be removed from the overcrowded cells by prison staff within a few hours.” Human Rights Council, *Out of Sight, Out of Mind: Deaths in Detention in the Syrian Arab Republic*, ¶ 53, U.N. Doc. A/HRC/31/CRP.1 (Feb. 3, 2016).

<sup>29</sup> Amnesty Int’l, *‘It Breaks the Human’: Torture, Disease and Death in Syria’s Prisons*, AI Index MDE 24/4508/2016 (Aug. 18, 2016).

the beginning of detainees' experience with torture, which was a routine tool, often used to extract false confessions.<sup>30</sup>

54. Detainees were subjected to several torture methods. For example, the *Dulab* is a torture method that involves forcing a detainee into a car tire, then beating them with a whip or stick. Usually, the victim is bent forward from the hip with their hands tied or cuffed behind their back so that their feet and head are on one side of the tire, while their hands and back were on the other.
55. The *German Chair* is a torture method where detainees were placed face down underneath a tilted chair with the backrest over the detainee's back, with their hands shackled behind them, wedging the backrest between the detainees back and shackled hands. The torturer then slowly returned the chair to its normal position, causing the metal chair to press into the bottom of the detainees back. This often causes fractures in the spine and temporary paralysis.



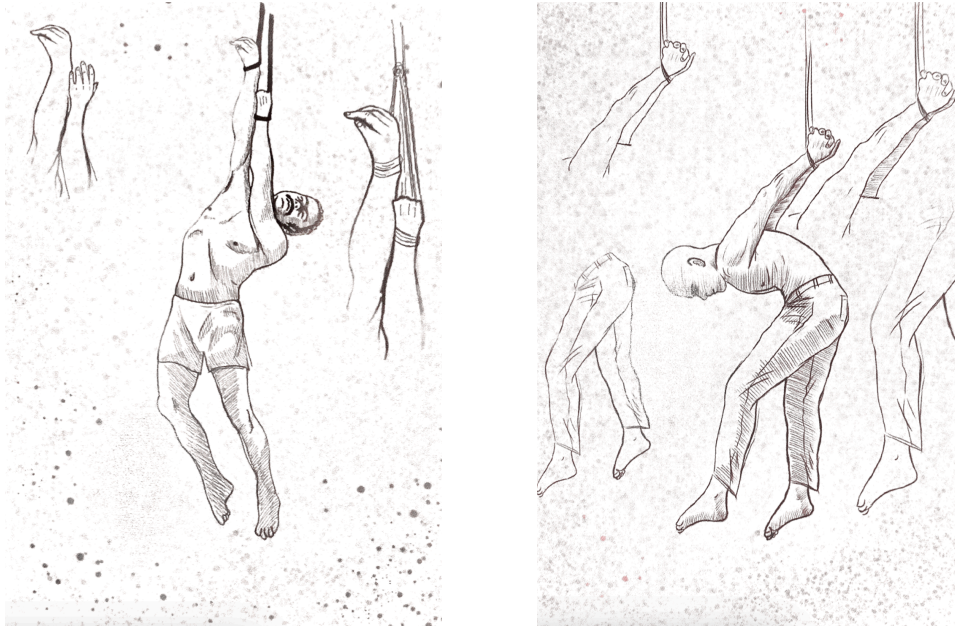
*Image 1: Depiction of the Dulab*      *Image 2: Depiction of the German Chair*

56. *Shabah* is a method of torture by which detainees are suspended by their wrists from a wall or ceiling. The vast majority of detainees experienced or saw others suffer from *shabah*. Detainees were sometimes suspended 2.5 meters above the ground. Some were suspended with their hands tied behind their back, forcing enormous pressure on their shoulders.
57. Often, new arrivals to the AFI Mezzeh complex would be tied to the top of a cell door with a plastic cable tie, and forced to remain standing all night. If someone passed

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<sup>30</sup> *Id.*

through the corridor of the cells, they could see hands tied to the upper sections of the doors of the solitary cells. Suspension was also used as a form of punishment by wardens and interrogators. Wardens would suspend detainees on the walls of the corridor or in the investigation yard, which was empty at night. Detainees might be left hanging by their hands “for hours or days.”<sup>31</sup>



*Images 3 & 4: Depictions of detainees subjected to shabah*

58. *Lakhdar Brahimi* is a beating method that was named by intelligence operatives in mockery of the Algerian diplomat appointed as envoy to Syria by the UN and Arab League in 2012. A thick plastic green water pipe (*lakhdar* meaning green in Arabic) was used to beat the feet of detainee which were tied to a pole or fixture.

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<sup>31</sup> Human Rights Watch, *supra* note 11



*Image 5: Depiction of Lakhdar Brahimi*

59. The *magic carpet*, or *basat al-reeh*, is a torture method by which detainees' limbs are tied to a long wooden board with a hinge in the middle.<sup>32</sup> The lower part of the board is then forced over the upper part, effectively folding the detainee in on themselves and causing severe pain to the lower back. Interrogators would often beat or shock detainees while they were trapped in the mechanism. Detainees also reported having their limbs stretched or pulled, as if on a rack.<sup>33</sup>
60. Electric stun-guns and electroshock machines were used to electrocute detainees.<sup>34</sup> Torturers attached wires extending from a small-sized generator resembling an old military phone. Part of the generator was then rotated, sending an electric current through the detainee's body. Interrogators and guards also used an electric stick, powered by batteries and modified, to intensify the electric charge. Detainees were also forced to stand in water or were splashed with water to amplify the shocks. Shocks could last 30 seconds and sometimes led to fainting or burning of the skin.<sup>35</sup>
61. Detainees were also doused in boiling or freezing water by interrogators.<sup>36</sup> This method of torture was frequently reported by women who were sexually assaulted. Likewise, freezing cold water was doused on detainees after severe beating and whipping sessions.

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<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> Amnesty Int'l, *supra* note 26, at 28.

<sup>36</sup> Human Rights Watch, *supra* note 11.

Dousing by cold water typically happened in open yards or damp solitary cells in the winter to maximize torment.

### Psychological Torture at the AFI Mezzeh Complex

62. In addition to physical torture, Plaintiff described the mental pain and suffering he experienced while in detention at the AFI Mezzeh complex. Plaintiff described being threatened with electrocution, among other torture methods, as well having to listen to the near-constant torture of other detainees.<sup>37</sup> According to Plaintiff, on many nights he wished for his own death so that he would no longer have to endure the misery of his detention.<sup>38</sup>

63. Our research demonstrates the extent to which, in addition to physical torture, detainees at the AFI Mezzeh complex also endured mental torture. For example, mock executions were conducted on detainees held in AFI facilities, including those in the Mezzeh complex. A former detainee held at the AFI Mezzeh complex, Nour, described their experience:

They took four people from the cell, blindfolded us, and put us on our knees. I realized later that they put three other new people with you, so that when they shoot at us with the AK47, the three others fall down. The detainee would think that the three on the ground were other detainees, but they were actually security forces who were like actors.... Then they take off the blindfold, and you see the people on the ground, covered in blood... It would look like they were all dead to the detainee. They even put blood on them, but they were still alive. It's like a play. Then they take you to the room, and there is no way you will not confess."<sup>39</sup> At times, detainees were also placed in coffins and threatened with death.<sup>40</sup>

64. Other forms of psychological torture included forcing detainees to witness the torture of others, depriving them of sleep, and making threats against their families, including threats that Syrian officials would physically hurt or even rape a detainee's family members if they did not confess.<sup>41</sup>

65. Witnessing the torture of others can have profound psychological effects, and one Syrian detainee described it as worse than physical torture.<sup>42</sup> Like most forms of psychological torture, these exposures, deprivations, and threats were intended to wear the detainee down mentally and extract a confession.

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<sup>37</sup> Mzaik Decl. ¶¶ 27, 34, 36–40.

<sup>38</sup> *Id.* at ¶ 43.

<sup>39</sup> Amnesty Int'l, *supra* note 26.

<sup>40</sup> Human Rights Watch, *supra* note 11.

<sup>41</sup> Amnesty Int'l, *supra* note 26; Human Rights Watch, "By All Means Necessary": *Individual and Command Responsibility or Crimes Against Humanity in Syria* (Dec. 15, 2011).

<sup>42</sup> Amnesty Int'l, *supra* note 26, at 33.



## Detention Conditions at the AFI Mezzeh Complex

66. Detainees held at AFI Mezzeh since 2011 report that the complex contained several large-scale detention facilities: the Old Prison, the New Prison and some repurposed buildings within the Mezzeh complex, including airplane hangars.
67. While detainees could not always determine exactly where they were within the AFI Mezzeh complex, many detainees were transferred between different buildings housing detention facilities within the complex. For example, one detainee we interviewed was initially placed in the Information and Studies Branch building in the Mezzeh complex. He was then transferred with others to the nearby Aircraft Security building where he stayed for about two months in a classroom designated for Air Force cadets. It was a large hall 11 meters long and 6 meters wide that housed more than 180 detainees. He was then transferred to the New Prison and placed in a solitary cell of 2 meters by 1 meter along with 14 other detainees. After his interrogation was completed, he was transferred to an airplane hangar with about 700 detainees.<sup>43</sup>
68. Plaintiff was held at the AFI Mezzeh complex. His account details abysmal detention conditions. He describes overcrowded, unheated cells despite the frigid winter temperatures.<sup>44</sup> Plaintiff and other detainees developed skin rashes and appeared malnourished and unhealthy.<sup>45</sup>
69. Plaintiff's description of his detention conditions is consistent with our research. Conditions in the detention centers of the AFI Mezzeh complex were dehumanizing and reflected the regime's strategy of asserting a degree of humiliating control over the Syrian people. Nearly all detainees held at the AFI Mezzeh complex were exposed to severe overcrowding, poor sanitation, extreme temperatures, lack of proper nutrition and amenities, lack of access to proper healthcare, and dehumanization. Some detainees were forced to spend time with the bodies of dead inmates or to bury those bodies. In tandem with torture and other ill treatment, these conditions can be lethal and likely contributed to some of the deaths that occurred at the AFI Mezzeh complex.<sup>46</sup>
70. Detainees were generally stripped of their personal identity, referred to only by numbers through the duration of their detention and even in the circumstance of their death. Detainees are assigned identification numbers in the prison registry. Detainees recounted being forbidden from giving their real names. Even when detainees died inside a cell, their fellow detainees would be punished if they referred to them by their name, rather than by their identification number, when reporting their death to the

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<sup>43</sup> SYRIAN GULAG (M.H., interview).

<sup>44</sup> Mzaik Decl. ¶¶ 19–20.

<sup>45</sup> *Id.* ¶¶ 22, 25.

<sup>46</sup> See Amnesty Int'l, *supra* note 24, at 34.

guards. In the Caesar photos, these identification numbers can be seen on the foreheads of the detainees who perished in the intelligence branches.<sup>47</sup>

71. One former detainee we interviewed recalled detainees who died as a result of the detention conditions. That detainee, who was arrested in 2011 by AFI in a Damascus internet café on suspicion of opposition activity, recalled some of those deaths specifically. His 2011 detention was his second, so he knew what to expect. At the AFI Mezzeh complex, he had been crammed into a cell that became overcrowded due to an influx of demonstrators arrested by the regime. This overcrowding had a severe physical impact on detainees: inadequate ventilation in congested spaces like hangars and cells, each packed far beyond capacity, led to suffocation. Overcrowding also made sleep impossible, and limited access to food and basic medical care. As a result, detainees' health deteriorated.<sup>48</sup>

**D. The regime's repressive strategy of mass imprisonment and torture caused a profound, irreversible, and indelible impact on millions of Syrians**

72. The Assad regime maintains that its use of torture and interrogations is a practical measure to obtain "confessions."<sup>49</sup> In reality, "the system of torture does not serve to obtain information, but to terrorize and humiliate the population."<sup>50</sup>
73. The process of mass imprisonment and torture that the Assad regime has unleashed on Syrian society has made a profound, irreversible, and indelible impact on millions of Syrians. The prison network has become an intrinsic part of mainstream Syrian identity, carrying with it the long-lasting physical and mental harms to survivors of detention and torture, and their families, and the instability caused to society as a whole.
74. In addition to the torture he suffered in detention, Plaintiff described the mental pain and suffering of seeing and hearing the torture of other detainees, including his family member, as "horrific and long-lasting."<sup>51</sup>
75. In our research, detainees who have survived torture and acts of cruel, inhuman or degrading treatment in government facilities across the country face long-term mental and physical harm due to their treatment. Such harms suffered by former detainees include, as documented by the Syria COI, impotency in men and miscarriages in women and suicide, impaired bodily functions and chronic physical pain.<sup>52</sup> Many who have survived torture have fled Syria; those who cannot flee fear future detention and

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<sup>47</sup> In the Caesar photographs, which depict at least 6,786 detainees who died in detention, the AFI detention facilities in Damascus, which are predominantly concentrated at AFI Mezzeh, accounted for the third-highest documented number of deaths across all intelligence branches. See Human Rights Watch, *If the Dead Could Speak: Mass Deaths and Torture in Syria's Detention Facilities*, at 3 (Dec. 16, 2015).

<sup>48</sup> SYRIAN GULAG (Akram al-Saud, interview).

<sup>49</sup> Eur. Ctr. Const. & Human Rights, *Dossier: Human Rights Violations in Syria*, at 5 (Mar. 2021).

<sup>50</sup> *Id.*

<sup>51</sup> Mzaik Decl. ¶ 43.

<sup>52</sup> Human Rights Council, *supra* note 13.

persecution at the hands of intelligence services. Many seek ongoing medical treatment for significant physical ailments resulting from their treatment; many face ongoing mental anguish persistent in their day-to-day lives.<sup>53</sup>

76. The system of detention and torture has had long-term impacts on women and girls throughout Syria. Survivors of sexual and gender-based violence face a lack of protective measures against ongoing prejudice against, often female, survivors—in addition to ongoing serious physical and mental harms.<sup>54</sup> Women, whose husbands and male family members have been detained or killed while in detention, face dispossession of their homes, property, and inheritances due to uncertainty as to the official status of their detained family member or official seizure of the detainee’s property. Women face abuse, harassment, and threats when seeking official information as to their detained husbands or family members.<sup>55</sup>
77. Families of those detained across Syria suffer from extensive fear, anguish, and distress—living in constant uncertainty as to the wellbeing and location of missing detainees.<sup>56</sup> Those released from intelligence service custody struggle to access “secure housing, access to education for their children, civil documentation and employment.”<sup>57</sup> The fear of being detained again confines many of the released to their homes. Survivors of detention, ill-treatment, and torture find themselves unable to fully reintegrate into civic life—ongoing restrictions imposed by security services precluding the ability to engage in basic civil activities.<sup>58</sup>
78. Those who might otherwise speak out against the regime’s policies of detention and torture live in fear of reprisal—that the intelligence service’s mechanisms might be directed at them for their protest against the “brutal oppression of a vast number of communities.”<sup>59</sup> Work to document the regime’s activities is hindered by the high levels of repression and the inability of Syrian citizens to leave. In a Human Rights Watch report on deaths and torture in Syrian detention facilities, of the 700 families who recognized missing relatives in released photographs of dead detainees, “only one in ten families were willing to speak about their relative’s death publicly, for fear of reprisals against them or their family members that remained in Syria.”<sup>60</sup>
79. The widespread and systematic use of interrogation and torture in these detention centers, including by AFI at the Mezzeh Military Airport, where Plaintiff was held, is still ongoing in Syria. As recently reported in July 2024 by the UN Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment, “I am alarmed about reports that indicate that torture is still being practiced on a large scale

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<sup>53</sup> *Id.*

<sup>54</sup> Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, *Gendered Impact of the Conflict in the Syrian Arab Republic on Women and Girls* (June 12, 2023).

<sup>55</sup> *Id.*

<sup>56</sup> Human Rights Council, *supra* note 22.

<sup>57</sup> *Id.* at ¶ 82.

<sup>58</sup> *Id.* at ¶¶ 78–82.

<sup>59</sup> *Id.* at ¶ 7.

<sup>60</sup> Human Rights Watch, *supra* note 44, at 7.

in Syria. This is despite the very clear order of the [International Court of Justice] to end torture without delay. More than six months later there is no sign at all that the torture is being addressed in the country.”<sup>61</sup>

## CONCLUSIONS

80. Following the 2011 uprising in Syria, the Assad regime implemented a nationwide strategy to suppress protesters and perceived opponents to Assad’s authoritarian rule. To do so, the regime relied heavily on the Syrian intelligence agencies and their vast detention system, including that of the Air Force Intelligence.
81. Integral to the regime’s repressive strategy was the widespread and systematic use of interrogation and torture in these detention centers, including by the Air Force Intelligence at the Mezzeh complex, where Plaintiff was held. Plaintiff’s detention and torture is consistent with our research into the state-sanctioned use of torture in these detention facilities.
82. The regime’s repressive strategy has had a devastating impact on not only the individuals detained, tortured and/or killed in detention, but also on Syrian society as a whole.
83. In sum, Plaintiff’s arrest for perceived anti-regime activities and his abuse at the AFI Mezzeh complex is characteristic of the Assad regime’s repressive strategy following the 2011 uprisings to suppress perceived opponents through the systematic use of detention, interrogation and torture, which continues to this day.

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<sup>61</sup> Press Release, Off. U.N. High Comm’r for Human Rights, *Torture Allegations Continue in Syria Despite ICJ Order: UN Expert* (July 1, 2024). *See also* Syrian Network for Human Rights, *SNHR Has Documented the Death of 15,383 Syrians Under Torture Since March 2011 with 157, 287 Still Detained And/OR Forcibly Disappeared* (June 26, 2024) (“The report stresses that the Syrian regime continues to breach the order issued by the International Court of Justice (ICJ), having taken no action to end torture in its detention centers.”); Syrian Network for Human Rights, *In the Nine Months Since the ICJ Issued its Order, the Syrian Regime Has Killed at Least 43 Individuals Due to Torture, and Arrested at Least 756 Civilians, Including 9 Children and 24 Women* (Aug. 15, 2024) (“The report also stresses that the Syrian regime has persistently demonstrated utter disregard for the ICJ’s Order and for the demands of most of the mandates of the special procedures at the UN Human Rights Council (HRC), as well as the resolutions adopted by the UN Security Council and the UN General Assembly, especially on the issue of detention and torture. Despite thousands of items of evidence and accounts proving and documenting the continuing nature of these practices, the regime has not taken even one step to end them.”); Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, U.N. Doc. A/HRC/57/86 (Aug. 12, 2024) “Arbitrary detention, torture, enforced disappearances and deaths in detention continue[.]” (1); Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, U.N. Doc. A/HRC/55/64 (Feb. 9, 2024) (“Enforced disappearance, torture, ill-treatment and deaths in State custody continue[.]...” (10); Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, U.N. Doc A/HRC/54/58 (Aug. 14, 2023) (“Torture and ill-treatment continued during the reporting period.” (8).

I declare under penalty of perjury under the laws of the United States that the foregoing is a true statement of my independent professional opinion.

Executed on this 25th day of November 2024 in France.

A handwritten signature in black ink, appearing to be 'Jaber Baker', with a stylized flourish at the end.

Jaber Baker

Executed on this 23rd day of November 2024 in Amsterdam, The Netherlands.

A handwritten signature in blue ink, appearing to be 'Uğur Ümit Üngör', with a stylized flourish at the end.

Uğur Ümit Üngör

## APPENDIX

**EXHIBIT A**  
**CV OF JABER BAKER**

**Experience**

- September 2012 – Present: Senior Researcher at Center for Media and Cultural Freedom (Skeyes).

**Research Books**

- October 2021 – Present: Co-author with Dr. Anne-Marie McManus, on the “**Syrian Prison Heritage**” project, a research book that explains the details of life in Syrian prisons, culture, art, letters, poetry, food, study...etc. It is the prisoner’s diaries there.
- August 2018 – May 2022: Co-authors of “**Syrian Gulag: Assad’s Prisons, 1970-2020**”, the first-ever comprehensive study of Syrian political prisons, issued in the Dutch language by Boom uitgevers Amsterdam. It will be issued in the English language by Bloomsbury, in September 2023.

**Fiction Books**

- December 2018 – Present: “**Diaspora - Western Mediterranean, Eastern the World**”, a novel about the experiences of migration and asylum for Syrians and Arabs who arrived in Europe during the last decade, based on documented testimonies.
- May 2022 – Present: “**The Doll**”, a novel about the experiences of Syrian female detainees who still living in Idlib Syria.
- May 2020 – Present: “**Another Aid Worker... The full story of the abduction of Kayla Mueller and Omar Khani**”, fictionalized autobiography is anchored in the realities and chilling details of the abduction of Omar Khani and Kayla Mueller in Syria, 2013.
- November 2017 – June 2020: “**Bab Alfradis – Missing for Guilan Damascene**”, a novel issued by Mosaic for studies and publication. October 2014 – April 2017: “**601 Divine Trials**” a novel is based on a legal document whose compilation lasted for more than three years. It recorded cases of survivors who had passed through the military hospital known as “601”.

**Research Projects**

- January 2021 – Present, managing the knowledge contained in a "Liberation of Palmyra Prison" project with the "Najoon" organization, which is the virtual reconstruction of Palmyra prison and, at the same time, the rebuilding of prison life there.

**Documentary Movies**

- December 2021 – December 2022, research, and preparation of the film "The creed of the brave", It deals with the "Servants of God" movement, one the names of activities founded by Abdul Ghaffar Khan, one of the most critically unknown Muslim figures who resisted the British occupation in the Indian subcontinent.

- March 2019 – February 2020, preparation and writing for the documentary film Visa to a Northern Exile, which deals with the story of the Molokan people in the Netherlands.
- April 2021 – Present, research, and preparation for the film “The Black Train”, which presents the migration of Turkish workers to Europe after World War II and the role of Turkish workers in the post-war reconstruction of Europe.
- November 2018 – January 2019, research and preparation of the film “Refugee and city: Amsterdam as an open city”, posted via Al Jazeera documentary channel.
- April 2017 – April 2018 research, preparation, writing, and producing the film “HOMS: the last scene” posted via Alaraby TV network.

### **Podcast Series**

- February 2022 – December 2022, “THE CLERK 02” produces a creative podcast that showcases the trial details of two Syrian intelligence officers, Anwar Raslan and Iyad Al-Gharib, in Koblenz, Germany.
- May 2022 – Present, “Another Aid Worker” produce a creative podcast that showcases the realities and chilling details of the abduction of Omar Khani and Kayla Mueller in Syria, in 2013, and Beatles Court in Virginia, USA.
- February 2021 – February 2022, “THE CLERK 01” produces a creative podcast that showcases the trial details of two Syrian intelligence officers, Anwar Raslan and Iyad Al-Gharib, in Koblenz, Germany.
- December 2020 – April 2022, “THE IMPOSSIBLE STAGE”, Concept and General Director, a radio drama series about real acts of resistance among political detainees in Sednaya Military Prison in Syria at the end of the 1980s and the beginning of the 1990s.
- November 2020 – February 2021, ‘Search for Meaning’, create, prepare and manage a series of interviews with psychologists about the meaning of the prison experience in Syria.

### **Journalism Jobs**

- June 2015 – May 2016, Profile writer, for people, books, and places in “Alarab” newspaper in London UK.
- January 2015 – May 2016, editor in chief for “Alwan Radio” in Istanbul, Turkey.
- March 2009 – May 2012, investigative journalist at “Alwatan” newspaper, in Damascus, Syria.
- January 2008 – May 2009, editor in chief for “Mazaj” touristic newspaper, in Damascus, Syria.
- January 2006 – May 2008, investigative journalist at “Balck and Whit Magazine”, in Damascus, Syria.

### **Education**

- 2022 – present, Master of political studies, EHESS Paris.



- 2016 – 2017, Master of social and solidarity economy, Université de Haut-Alsace Mulhouse-Colmar.
- 2010 – 2011, EME Management, University of Damascus, Syria.
- 2001 – 2002, Industrial Intermediate Institute - Machines & Engines, Quneitra – Syria.

### **Trainer**

- 2015 – Present, Trainer in the field of press and freedom of expression.
- 2020 – Present, Trainer in the field of conducting interviews with former detainees.

### **Languages**

- Arabic mother tongue.
- English B2.
- French B1.

**EXHIBIT B**  
**CV OF UĞUR ÜMIT ÜNGÖR**

**Experience**

- 2008 – 2009, Lecturer in International History at the Department of History of the University of Sheffield.
- 2009 – 2010, Post-Doctoral Research Fellow at the Centre for War Studies at the University College Dublin.
- 2010 – 2020, Associate Professor at the Department of History at Utrecht University.
- 2020 – Present, Professor of Holocaust and Genocide Studies at the University of Amsterdam and the NIOD Institute for War, Holocaust, and Genocide Studies.

**Research Books**

- *Confiscation and Destruction: The Young Turk Seizure of Armenian Property* (Continuum, 2011). The book provides a comprehensive analysis of the mass sequestration of Armenian property by the Young Turk regime during the 1915 Armenian genocide.
- *The Making of Modern Turkey: Nation and State in Eastern Anatolia, 1913-1950* (Oxford University Press, 2011). This history documents how the Young Turk regime promoted nationalist population policies aimed at maintain ethnic homogenization.
- *Genocide: New Perspectives on its Causes, Courses and Consequences* (Amsterdam University Press, 2016). The series includes peer-reviewed work on the impact of genocides on twentieth-century societies.
- *Paramilitarism: Mass Violence in the Shadow of the State* (Oxford University Press, 2019). This book looks at the ways certain regimes outsource mass political violence against civilian populations.
- *The Syrian Gulag: Inside Assad's Prison System* (I.B. Taurus, 2023). This study explores the ways the Assad regime wields its vast and complex system of arrest, detention, and torture as a tool for retaining power.

**Academic Articles**

- “*When Persecution Bleeds into Mass Murder: The Processive Nature of Genocide*,” 1 GENOCIDE STUD. & PREVENTION 173 (2006).
- *Seeing like a Nation-State: Young Turk Social Engineering in Eastern Turkey, 1913-1950*, 10 J. GENOCIDE RSCH. 15 (2008).
- *Geographies of Nationalism and Violence: Towards a New Understanding of Young Turk Social Engineering*, EUR. J. TURKISH STUD. (2008).
- *Collaboration in Genocide: Ottoman Empire, 1915-1916; Nazi-Occupied Baltic States, 1941-1944; and Rwanda, 1994*, 25 HOLOCAUST & GENOCIDE STUD. 404 (2011).

- *Inleiding: Massaal Geweld in de Twintigste Eeuw*, 124 TIJDSCHRIFT VOOR GESCHIEDENIS 440 (2011).
- *Orphans, Converts, and Prostitutes: Social Consequences of War and Persecution in the Ottoman Empire, 1914-1923*, 19 WAR IN HIST. 173 (2012).
- *Studying Mass Violence: Pitfalls, Problems and Promises*, 7 GENOCIDE STUD. & PREVENTION 68 (2012).
- *Creative Destruction: Shaping the High-Modernist City in Interwar Turkey*, 39 J. URB. HIST. 297 (2013).
- *Rethinking the Violence of Pacification: State Formation and Bandits in the Young Turk Era, 1914-1937*, 54 COMP. STUD. SOC'Y & HIST. 746 (2012).
- *Untying the Tongue-Tied: Cultural and Linguistic Genocide as Population Politics*, 217 INT'L J. SOC. LANGUAGE 127 (2012).
- *Property and Family: Mobilisation for Violence during the Armenian Genocide*, 10 TIJDSCHRIFT VOOR SOCIALE EN ECONOMISCHE GESCHIEDENIS 96 (2013).
- *The Armenian Genocide: A Multi-Dimensional Process of Destruction*, 15 GLOBAL DIALOGUE (2013).
- *Lost in Commemoration: The Armenian Genocide in Memory and Identity*, 48 PATTERNS OF PREJUDICE 147 (2014).
- *Confiscation and Violence: A Comparison of Ottoman and Russian Economic Persecution in World War I*, 12 J. MOD. EUR. HIST. 500 (2014).
- *The Collapse of the Ottoman and Habsburg Empires and the Brutalization of the Successor States*, 13 J. MOD. EUR. HIST. 226 (2015).
- *Funny as Hell: The Functions of Humor during and after Genocide*, 3 EUR. J. HUMOUR RSCH. 80 (2015).
- *Dersim 1938: A Genocide of Modernity*, 6 WIENER JAHRBUCH FÜR KURDISCHE STUDIEN 48 (2017).
- *On the Multiple Uses of Video Footage among Contemporary Perpetrators*, 2 J. PERPETRATOR RSCH. 207 (2019).
- *Shabbiha: Paramilitary Groups, Mass Violence and Social Polarization in Homs*, 1 VIOLENCE 59 (2020).
- *Undercover etnografie en daderonderzoek in Syrië*, 26 KWALON 181 (2021).

## **Book Chapters**

- *Turkey for the Turks: Demographic Engineering in Eastern Anatolia, 1914-1945*, in A QUESTION OF GENOCIDE, 1915: ARMENIANS AND TURKS AT THE END OF THE OTTOMAN EMPIRE 287 (Ronald G. Suny & Fatma M. Göçek eds., 2011).
- *Fresh Understandings of the Armenian Genocide: Mapping New Terrain with Old Questions*, in NEW DIRECTIONS IN GENOCIDE RESEARCH 197 (Adam Jones ed., 2011).
- *Disastrous Decade: Armenians and Kurds under Young Turk Rule, 1915-25*, in SOCIAL RELATIONS IN OTTOMAN DIYARBEKIR, 1870-1915 267 (Joost Jongerden ed., 2012).

- *Paramilitary Violence in the Collapsing Ottoman Empire*, in *WAR IN PEACE: PARAMILITARY VIOLENCE AFTER THE GREAT WAR 162* (Robert Gerwarth & John Horne eds., 2012).
- *The Armenian Genocide, 1915*, in *THE HOLOCAUST AND OTHER GENOCIDES: AN INTRODUCTION 45* (Barbara Boender & Wichert ten Have eds., 2012).
- *Genocide and Property: Root Cause or Concomitant Effect?*, in *GENOCIDE, RISK AND RESILIENCE: AN INTERDISCIPLINARY APPROACH 178* (Bert Ingelaere et al. eds., 2013).
- *Cultural Genocide: Destruction of Material and Immaterial Human Culture*, in *THE ROUTLEDGE HISTORY OF GENOCIDE 241* (Cathie Carmichael & Richard Maguire eds., 2015).
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- *Mass Violence against Civilians during the Balkan Wars*, in *THE WARS BEFORE THE GREAT WAR: CONFLICT AND INTERNATIONAL POLITICS BEFORE THE OUTBREAK OF THE FIRST WORLD WAR 76* (William Mulligan et al. eds., 2015).
- *Syrische oorlogsmisdadigers en Assads geweldsapparaat*, 16 *Zemzem* 24 (2020).
- *From Perpetrators to Perpetration: Definition, Typologies, and Processes*, in *ROUTLEDGE HANDBOOK OF PERPETRATOR STUDIES 7* (Susanne Knittel & Zack Goldberg eds., 2019).
- *Eurocentrism in Research on Mass Violence*, in *EUROCENTRISM IN EUROPEAN HISTORY AND MEMORY 65* (Marjet Brolsma et al. eds., 2019).
- *Assad's Paramilitaries: Shabbiha Perpetrators in the Syrian Civil War*, in *RESEARCHING PERPETRATORS OF GENOCIDE 137* (Kjell Anderson & Erin Jessee eds., 2020).
- *Alawite Warrior-Sheikhs: Ali Khizam and the Specter of Sectarian Violence in Syria*, in *ROUTLEDGE HANDBOOK OF RELIGION AND VIOLENCE 56* (Stephen Smith ed., 2021).

### Academic Essays

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- *Are Syria and Iraq the Middle Eastern Bloodlands?*, Peace Palace Libr. Blog (July 20, 2017), <https://peacepalacelibrary.nl/blog/2017/are-syria-and-iraq-middle-eastern-bloodlands/>.

- *The Great Turkish Trek*, Café Babel (Aug. 26, 2016), <http://www.cafebabel.co.uk/lifestyle/article/the-great-turkish-trek.html/>.
- *No Muslim Hipsters?*, Café Babel (Jan. 11, 2016), <http://www.cafebabel.co.uk/lifestyle/article/no-muslim-hipsters-growing-a-beard-in-the-netherlands.html/>.
- *Turkey's Borderlands, the Syrian Civil War, and the Kurds*, E-IR (Sept. 22, 2015), [www.e-ir.info/2015/09/22/turkeys-borderlands-the-syrian-civil-war-and-the-kurds/](http://www.e-ir.info/2015/09/22/turkeys-borderlands-the-syrian-civil-war-and-the-kurds/).
- *The Presentation of Self in Academic Life*, 15 Sociologisch Mokum 18 (2011).

### **Awards**

- 2010, Erasmus Prize by the *Praemium Erasmianum*
- 2012, Heineken Young Scientists Award for History in 2012 from the Royal Netherlands Academy of Sciences

### **Education**

- 2000 – 2004, B.A. in Sociology from the University of Groningen.
- 2004, Certificate in Genocide and Human Rights from the University of Toronto.
- 2004 – 2005, M.A. in Holocaust and Genocide Studies from the University of Amsterdam.
- 2005 – 2009, Ph.D. from the University of Amsterdam.

### **Languages**

- English
- Dutch

## EXHIBIT C

### INDEX OF MATERIALS CITED IN EXPERT REPORT OF JBER BAKER AND UĞUR ÜMIT ÜNGÖR

#### I. PUBLICLY AVAILABLE MATERIALS CITED IN EXPERT REPORT OF JABER BAKER AND UĞUR ÜMIT ÜNGÖR

##### A. Jaber Baker and Uğur Ümit Üngör's Research and Scholarship:

No.	Description
1.	JABER BAKER & UĞUR ÜMIT ÜNGÖR, SYRIAN GULAG: INSIDE ASSAD'S PRISON SYSTEM (2023).

##### B. Other Academic Publications

No.	Description
2.	SALWA ISMAIL, THE RULE OF VIOLENCE: SUBJECTIVITY, MEMORY AND GOVERNMENT IN SYRIA (2018).
3.	GERD LINDE, DIE SOWJETISCH-SYRISCHEN BEZIEHUNGEN IM REGIONALEN UMFELD (1982).
4.	ANATOLY MARCHENKO, MY TESTIMONY (1989).
5.	PATRICK SEALE, ASAD: THE STRUGGLE FOR THE MIDDLE EAST (1989).

##### C. United Nations Human Rights Council Reports

No.	Description
6.	Human Rights Council, Rep. of the Indep. Int'l Comm'n of Inquiry on the Syrian Arab Republic, " <i>No End in Sight</i> ": <i>Torture and ill-treatment in the Syrian Arab Republic 2020-2023</i> , U.N. Doc. A/HRC/53/CRP.5 (Jul. 10, 2023).
7.	Human Rights Council, Rep. of the Indep. Int'l Comm'n of Inquiry on the Syrian Arab Republic, U.N. Doc. A/HRC/46/55 (Mar. 11, 2021).
8.	Human Rights Council, <i>Out of Sight, Out of Mind: Deaths in Detention in the Syrian Arab Republic</i> , U.N. Doc. A/HRC/31/CRP.1 (Feb. 3, 2016).
9.	Human Rights Council, Rep. of the Indep. Int'l Comm'n of Inquiry on the Syrian Arab Republic, U.N. Doc. A/HRC/57/86 (Aug. 12, 2024).
10.	Human Rights Council, Rep. of the Indep. Int'l Comm'n of Inquiry on the Syrian Arab Republic, U.N. Doc. A/HRC/55/64 (Feb. 9, 2024).
11.	Human Rights Council, Rep. of the Indep. Int'l Comm'n of Inquiry on the Syrian Arab Republic, U.N. Doc A/HRC/54/58 (Aug. 14, 2023).
12.	Human Rights Council, Rep. of the Indep. Int'l Comm'n of Inquiry on the Syrian Arab Republic, <i>Gendered Impact of the Conflict in the Syrian Arab Republic on Women and Girls</i> (June 12, 2023).
13.	Press Release, Off. U.N. High Comm'r for Human Rights, <i>Torture Allegations Continue in Syria Despite ICJ Order: UN Expert</i> (July 1, 2024).

14.	Human Rights Council, Rep. of the Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, <i>Gendered Impact of the Conflict in the Syrian Arab Republic on Women and Girls</i> (June 12, 2023).
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#### D. Government Materials

No.	Description
15.	Constitution of the Syrian Arab Republic Feb. 26, 2012.
16.	US Dep’t of State, Bureau of Democracy, H.R. and Lab., Syria 2012 Human Rights Report (2012).

#### E. Non-Governmental Organization Reports

No.	Description
17.	Human Rights Watch, <i>“We’ve Never Seen Such Horror”: Crimes Against Humanity by Syrian Security Forces</i> (June 1, 2011).
18.	Helen Fair & Roy Walmsley, Inst. for Crim. Pol’y Rsch., <i>World Prison Population List 2</i> (Apr. 2024).
19.	Syrian Network for Human Rights, <i>Ninth Annual Report on Torture in Syria on the International Day in Support of Victims of Torture 9</i> (June 26, 2020).
20.	Human Rights Watch, <i>Torture Archipelago: Arbitrary Arrests, Torture, and Enforced Disappearances in Syria’s Underground Prisons since March 2011</i> (Jul. 3, 2012).
21.	Amnesty Int’l, <i>‘It Breaks the Human’: Torture, Disease and Death in Syria’s Prisons</i> , AI Index MDE 24/4508/2016 (Aug. 18, 2016).
22.	Human Rights Watch, <i>“By All Means Necessary”: Individual and Command Responsibility or Crimes Against Humanity in Syria</i> (Dec. 15, 2011).
23.	Human Rights Watch, <i>If the Dead Could Speak: Mass Deaths and Torture in Syria’s Detention Facilities</i> (Dec. 16, 2015).
24.	Syrian Network for Human Rights, <i>SNHR Has Documented the Death of 15,383 Syrians Under Torture Since March 2011 with 157, 287 Still Detained And/Or Forcibly Disappeared</i> (June 26, 2024).
25.	Syrian Network for Human Rights, <i>In the Nine Months Since the ICJ Issued its Order, the Syrian Regime Has Killed at Least 43 Individuals Due to Torture, and Arrested at Least 756 Civilians, Including 9 Children and 24 Women</i> (Aug. 15, 2024).
26.	Eur. Ctr. Const. & Human Rights, <i>Dossier: Human Rights Violations in Syria</i> (Mar. 2021).

#### F. Mzaik v. Syrian Arab Republic Complaint

No.	Description
27.	Mzaik v. Syrian Arab Republic, No. 1:22-cv-00042-ACR (D.D.C. Jan. 6, 2022).