

**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 DR. PAU PÉREZ-SALES

Table of Contents

I.	INTRODUCTION AND BACKGROUND.....	3
A.	Introduction.....	3
B.	Qualifications	3
C.	Compensation.....	5
D.	Evidentiary Basis for Opinion.....	5
II.	SUMMARY OF OPINIONS.....	6
III.	FINDINGS	7
A.	The Methods, Goals, and Impact of Psychological Torture.....	7
B.	Evidence of Psychological Torture in Syrian Detention Facilities, including AFI Mezzeh	9
C.	Psychological Torture Inflicted on Plaintiff Mzaik.....	13
IV.	CONCLUSION	14
	EXHIBIT A: CURRICULUM VITAE	16
	EXHIBIT B: ASSESSMENT OF TORTURE METHODS	23
	EXHIBIT C: MATERIALS RELIED UPON	36

I. INTRODUCTION AND BACKGROUND

A. Introduction

1. My name is Dr. Pau Pérez-Sales. I am a psychiatrist focused on political violence and the psychological effects of torture. My qualifications, basis for expertise, and summary of opinions are set forth in greater detail below.
2. I have been retained as an expert witness by Plaintiff Obada Mzaik in *Mzaik v. Syrian Arab Republic*, Case No. 1:22-cv-00042-ACR, to provide my expert opinion on the nature and impact of psychological torture, particularly as it relates to detention in the Syrian Arab Republic (“Syria”). As part of this work, I conducted a psychopathological assessment of the Plaintiff pursuant to the Istanbul Protocol, which sets out best practices on how to document and conduct effective legal and medical investigations into allegations of torture.
3. In the following expert report, I will first survey the current research and documentation on psychological torture, including the types of techniques commonly used, their goals, and the impact on victims. I will then evaluate how this broader research and documentation on psychological torture can be mapped onto documented conditions of detention in Syria, including Plaintiff’s own experience in detention and its impact.
4. I offer the following expert report containing my statement of expected testimony, the reasons for this testimony, and any data or other information and materials considered in forming my expert opinion and testimony.

B. Qualifications

5. My expertise is based on a long career in the field of psychiatry, with a particular focus on the psychological effects of torture and psychological torture. My *curriculum vitae*, including a full list of publications, is attached as **Exhibit A**. I recount my most relevant experiences below.
6. I am a psychiatrist and have spent most of my career focused on the psychological impacts of torture and on mental health in armed conflict. I received a doctorate in Medicine from the University of Barcelona in 1987. In 1994, I obtained a specialty in psychiatry at the Hospital La Paz in Madrid and received a PhD in psychiatry from the Universidad Autónoma in Madrid.
7. Currently, I am the Clinical Director at the SiR[a] Network for Assessment and Rehabilitation of Victims of Violence, the Director of the Postgraduate Diploma in Mental Health in Political Violence and Catastrophes at the GAC-Universidad Complutense de Madrid, and the Editor-in-Chief of Torture Journal, a platform for the exchange of original research among professionals concerned with the biomedical, psychological, and social interface of torture. I have served as Expert Advisor to the National Mechanism for the Prevention of Torture in Spain through the Office of the Ombudsman since 2010, and between 2017 and 2021, I was on the Steering Committee for the Principles on Effective Interviewing for Investigations and Information Gathering. I have also been a

trainer in forensic documentation of ill-treatment and torture through the Istanbul Protocol since 2004.

8. Previously, I was an Advisor to the National Mechanism for the Prevention of Torture of the Republic of Nicaragua (from 2014 to 2016), Ecuador (2016), Mexico (2018), and Brazil (from 2015 to 2019). From 2003 to 2019, I was the Associate Editor of Intervention at the International Journal of Mental Health, Psychosocial Work and Counselling in Areas of Armed Conflict. From 2001 to 2004, I was a Psychosocial Health Technician with Doctors Without Borders in Spain. From 2014 to 2015, I served as a Board Member on the Section of Psychological Consequences of Persecution and Torture at the World Psychiatric Association, and from 2015 to 2018, I was the Section Chair. I have also served as a consultant to the World Health Organization on Human Violence and Emergencies and Catastrophes.
9. I have written extensively on the topic of psychological torture, and on several psychological torture methods.
 - A. In 2017, I published my book, “Psychological Torture: Definition, evaluation and measurement.”¹
 - B. In 2019, I co-authored the Protocol on Medico-Legal Documentation of Sleep Deprivation.²
 - C. In 2019, I also published the article, “The 6/24 rule: A review and proposal for an international standard of a minimum of six hours of continuous sleep in detention settings.”³
 - D. In 2020, I published the book chapter, “Psychological Torture,” in the Research Handbook on Torture.⁴
 - E. In 2020, I co-authored the article, “Torture and the role of the psychological profession.”⁵
 - F. In 2021, I published the article, “Hunger: Deprivation and manipulation of food as a torture method. State of the art in research and ways forward.”⁶

¹ PAU PÉREZ-SALES, PSYCHOLOGICAL TORTURE: DEFINITION, EVALUATION, AND MEASUREMENT (2017).

² Pau Pérez-Sales et al., *Protocol on Medico-Legal Documentation of Sleep Deprivation*, 29(2) TORTURE J. 28 (2019).

³ Pau Pérez-Sales, *The 6/24 Rule: A Review and Proposal for an International Standard of a Minimum of Six Hours of Continuous Sleep in Detention Settings*, 29(3) TORTURE J. 1 (2019).

⁴ Pau Pérez-Sales, *Psychological Torture*, in RESEARCH HANDBOOK ON TORTURE 432 (Malcolm D. Evans & Jens Modvig eds., 2020).

⁵ Pau Pérez-Sales & Nora Sveass, *Torture and the Role of the Psychological Profession*, in HUMAN RIGHTS EDUCATION FOR PSYCHOLOGISTS 207, 210 (Polli Hagenaaers et al. eds., 2020).

⁶ Pau Pérez-Sales, *Hunger: Deprivation and Manipulation of Food as a Torture Method. State of the Art in Research and Ways Forward*, 30(3) TORTURE J. 3 (2021).

- G. In 2021, I also published the article, “Defining and documenting threats in the context of ill-treatment and torture.”⁷
 - H. In 2021, I also co-authored the article, “Current debates, development and challenges regarding enforced disappearance as torture.”⁸
 - I. In 2023, I co-authored the Protocol on Medico-Legal Documentation of Threats.⁹
 - J. In 2023, I also co-authored the book chapter, “Forensic Assessment of Psychological Torture” in the Encyclopedia of Forensic Sciences.¹⁰
10. I have served as a forensic expert in litigation in international and national courts, on four previous occasions.
- a. In 2015, I was an expert witness before the Inter-American Court of Human Rights with respect to the case *Caso Comunidad Campesina de Santa Bárbara v. Perú*.
 - b. In 2023, I was an expert witness before the Inter-American Court of Human Rights again with respect to the case *Caso Pueblos Rama (Kriol) y Creole v. Estado de Nicaragua*.
 - c. In 2017, I was an expert witness before the European Court of Human Rights with respect to the case *Bartesaghi Gallo and Others v. Italy*.
 - d. In 2017, I was also an expert witness before the European Court of Human Rights with respect to the case *N.D. and N.T. v. Spain*.

C. Compensation

11. I am not being compensated for this report or for my expert testimony. I will be reimbursed for reasonable expenses incurred while fulfilling my role as an expert. My opinion is not conditioned upon any payment.

D. Evidentiary Basis for Opinion

12. In preparing this report, I relied on my personal knowledge, expertise, and research on psychological torture. I also relied on research that I conducted in the process of drafting my book, “Psychological Torture: Definition, evaluation and measurement,” and other publications on psychological torture. I additionally relied on research that I conducted when drafting my article

⁷ Pau Pérez-Sales, *Defining and Documenting Threats in the Context of Ill-treatment and Torture*, 31(1) TORTURE J. 3 (2021).

⁸ Bernard Duhaime, Juan E. Méndez, & Pau Pérez-Sales, *Current Debates, Development and Challenges Regarding Enforced Disappearance as Torture*, 31(2) TORTURE J. 3 (2021).

⁹ Pau Pérez-Sales, et al., *Protocol on Medico-Legal Documentation of Threats*, 33(1) TORTURE J. 54 (2023).

¹⁰ Pau Pérez-Sales & Hans D. Petersen, *Forensic Assessment of Psychological Torture*, in *ENCYCLOPEDIA OF FORENSIC SCIENCES* 493 (Max M. Houck ed., 2023).

pertaining to threats as a torture method, “Defining and documenting threats in the context of ill-treatment and torture.” Finally, I relied on my experiences as a psychiatrist working with and interviewing victims of torture from a wide range of cultural contexts across the globe, including Syrian torture victims.

13. To better understand the situation in detention centers in Syria, I also relied on reports from research institutions, non-governmental organizations, and United Nations bodies, including the Independent International Commission of Inquiry on the Syrian Arab Republic. Many of these reports were based on first-hand interviews with former detainees, and some of the interviewees had, like Plaintiff Mzaik, been detained in the Air Force Intelligence (“AFI”) branch at the Mezzeh Military Airport (“AFI Mezzeh”).
14. With Plaintiff’s consent, I carried out a psychopathological assessment of Plaintiff pursuant to the Istanbul Protocol. As is among my standard practices, the assessment was based on his written responses to a detailed set of questions and a two-hour video interview we conducted together. A copy of the assessment is attached as **Exhibit B** (“Assessment”). I also examined documents in the above captioned case, including the Complaint. A list of the materials that I reviewed and/or relied on to prepare this report is attached hereto as **Exhibit C**.
15. I will supplement this expert report, to the extent necessary, based on the filing of additional relevant materials in this case.

II. SUMMARY OF OPINIONS

16. Although the precise definition of “psychological torture” varies, many academics, international bodies, and civil society organizations have explicitly described the infliction of severe psychological harm as rising to the level of torture. Broadly understood, psychological torture refers to practices which inflict serious mental harm without the use of overt physical force. Psychological torture is typically inflicted with the intent to break down the victim’s identity, create submission, and destroy a person’s dignity and will. Even when used over a relatively short period of time, psychological torture methods can affect the way the victim understands themselves and the world around them and is often associated with more severe and lasting clinical symptoms than other forms of torture.
17. Available documentation from the United Nations and civil society organizations shows that, in addition to physical acts of torture, government forces in Syria, including those at AFI Mezzeh, routinely employ many psychological torture methods, including the use of threats, humiliation, food deprivation, mock executions, and overcrowded and unhygienic conditions. Notably, there is widespread documentation showing that detainees in Syrian detention centers are frequently forced to witness or listen to the torture of other detainees and even family members, including at AFI Mezzeh, where Plaintiff Mzaik was detained.
18. Plaintiff was subjected to a torturing environment of extreme gravity over a prolonged period of time. Syrian government forces employed several

psychological torture methods against Plaintiff Mzaik, including the frequent use of threats and insults, forcing him to listen to the torture of other detainees on a nightly basis, forcing him to listen to the torture of his cousin, stripping Plaintiff naked on multiple occasions, prohibiting him from showering, and detaining him in degrading conditions.

19. Plaintiff's experience in detention caused him to suffer from severe post-traumatic stress disorder (PTSD). While those PTSD symptoms have progressively subsided over time, the trauma of his experience has left permanent sequelae, including damage to his belief in the goodness of human beings, in the possibility of trusting them, in the capacity to feel affection for other people, and in the perception of the future as a space in which he can develop personally.

III. FINDINGS

A. The Methods, Goals, and Impact of Psychological Torture

20. As described above, psychological torture is a way of inflicting serious mental harm without the use of overtly physical force.¹¹ Many academics,¹² international bodies,¹³ and civil society organizations¹⁴ have explicitly described the infliction of psychological harm as rising to the level of torture. Similar to physical torture, psychological torture is used for the purpose of breaking the will of victim and producing an identity breakdown which disrupts the victim's sense of self.¹⁵ Psychological torture can be divided into three categories: (i) pure cognitive and emotional suffering (cultivating feelings of humiliation, shame, and guilt); (ii) cognitive and emotional attacks through no-touch physical manipulation of the body (for example, solitary confinement, the use of music or painful sounds, hunger, or sleep deprivation), and; (iii) physical assaults leading to critical psychological pain (for example, waterboarding or prolonged stress positions).¹⁶

¹¹ Pérez-Sales & Sveass, *supra* note 5, at 209.

¹² See, e.g., J. Quiroga and J. Jaranson, *Torture*, in *ENCYCLOPEDIA OF PSYCHOLOGICAL TRAUMA* 1 (Gilbert Reyes et al. eds., 2008); Diarmuid Cunniffe, *The Worst Scars are in the Mind: Deconstructing Psychological Torture* 7(1) *ICL JOURNAL* 1 (2011); Daniel Kramer, *The Effects of Psychological Torture*, *BERKELEY LAW INTERNATIONAL HUMAN RIGHTS LAW CLINIC*, June 2010.

¹³ INTER-AMERICAN CONVENTION TO PREVENT AND PUNISH TORTURE art. 2, Dec. 9, 1985, *entered into force* Feb. 28, 1987, O.A.S.T.S. No. 67, <https://www.oas.org/juridico/english/treaties/a-51.html> (“Torture shall also be understood to be the use of methods upon a person intended to obliterate the personality of the victim or to diminish his physical or mental capacities, even if they do not cause physical pain or mental anguish.”).

¹⁴ Physicians for Human Rights, *Experiments in Torture: Evidence of Human Subject Research and Experimentation in the ‘Enhanced’ Interrogation Program* (June 2010), <https://www.opensocietyfoundations.org/publications/experiments-torture-evidence-human-subject-research-and-experimentation-enhanced>; Center for Constitutional Rights, *Report on Torture and Cruel, Inhuman, and Degrading Treatment of Prisoners at Guantánamo Bay, Cuba*, 16 (July 2006), https://ccrjustice.org/files/Report_ReportOnTorture.pdf.

¹⁵ Pérez-Sales & Sveass, *supra* note 5, at 209.

¹⁶ *Id.*

21. Interviews with torture survivors from a wide range of country contexts show that the harm caused by psychological torture can be more severe and long-lasting than the harm caused by physical torture. One 1986 study showed through qualitative in-depth interviews that psychological torture is associated with more severe and lasting clinical symptoms than other forms of torture.¹⁷ Another recent study analyzed the severity and psychological impact of various stressors in 432 torture survivors from Turkey and countries formerly part of Yugoslavia.¹⁸ That study found that non-physical torture, including psychological manipulation (threats of torture, witnessing torture), humiliating treatment (forced nudity, feces in food), and deprivation of basic needs (sleep, food), was more strongly associated with perceived torture severity and lasting psychological damage than was physical torture.¹⁹ This has been confirmed in studies conducted in Australia,²⁰ former German Democratic Republic,²¹ the Balkans,²² Palestine,²³ South Korea,²⁴ and multicultural samples from the United States.²⁵
22. Because torture methods are almost always used in conjunction with one another, the psychological harm caused by torture is most accurately measured when various torture methods are examined simultaneously. I coined the term “torturing environment” to refer to a milieu that creates the conditions for torture.²⁶ This torturing environment is made up of a group of contextual elements, conditions, and practices that obliterate the will and control of the victim.²⁷ The creation of this environment may involve one or more of the following: attacks to primary needs (such as food, water, or sleep); attacks to the need for safety and physical integrity (including the indirect infliction of pain, threats and fear tactics); and attacks to the self and identity, including individual,

¹⁷ F.E. Somnier & I.K. Genevke, *Psychotherapy for Victims of Torture*, 149(3) BRIT. J. PSYCHIATRY 323, 323–29 (1986).

¹⁸ Metin Başoğlu, *A Multivariate Contextual Analysis of Torture and Cruel, Inhuman, and Degrading Treatments: Implications for an Evidence-based Definition of Torture*, 79(2) Am. J. ORTHOPSYCHIATRY, 135, 135–45 (2009).

¹⁹ Pérez-Sales, *supra* note 1, at 114.

²⁰ Shakeh Momartin, D. Silove, Vijaya Manicavasagar, & Zachary Steel, *Dimensions of Trauma Associated with Posttraumatic Stress Disorder (PTSD) Cases, Severity and Functional Impairment: A Study of Bosnian Refugees Resettled in Australia* 57(5) SOC. SCI. & MED. 775, 775-81 (2003).

²¹ Michael Bauer, Stefan Priebe, Bettina Blaring, & Kerstin Adamczak, *Long-term Mental Sequelae of Political Imprisonment in East Germany*, 181(4) J. NERVOUS & MENTAL DISEASE 257, 257–262 (1993).

²² Başoğlu, *supra* note 18, at 135-45.

²³ Raija-Leena Punamäki, Samir Qouta, & Eyad El Sarraj, *Nature of Torture, PTSD, and Somatic*

Symptoms Among Political Ex-prisoners, 23(4) J. TRAUMATIC STRESS 532, 532-36 (2010).

²⁴ Hyunjung Choi, Hoon-Jin Lee, & Hwa-Young Lee, *The Effects of Torture-related Stressors on Long-term Complex Post-traumatic Symptoms in South Korean Torture Survivors*, 52 INT’L J. PSYCH. 57, 57–66 (2017).

²⁵ Joshua B. Hooberman et al., *Classifying the Torture Experiences of Refugees Living in the United States*, 22(1) J. INTERPERSONAL VIOLENCE 108, 108–123 (2007).

²⁶ Pérez-Sales, *supra* note 4, at 451.

²⁷ Pérez-Sales, *supra* note 5, at 210.

group and collective dimensions of identity (through tactics including humiliation, insults, and degrading conditions).²⁸

23. Psychological experts have identified threats, especially threats to family, as a particularly harmful method of psychological torture. One 2005 study found that the “[f]ear of threat to safety and loss of control over life appeared to be the most important mediating factors in PTSD and depression.”²⁹
24. Being subjected to a torturing environment can have profound and lasting psychological effects.³⁰ Clinical psychological consequences can include anxiety disorders, post-traumatic stress disorder (“PTSD”) and complex PTSD, personality changes, substance abuse, and chronic depressive disorders.³¹ More subtle signs of psychological harm include loss of self-confidence, a deteriorated sense of self, intolerance of uncertainty and ambiguity, the need to be reassured when faced with minor problems, and difficulties finding purpose and meaning in life.³²

B. Evidence of Psychological Torture in Syrian Detention Facilities, including AFI Mezzeh

25. The United Nations and civil society organizations have documented the existence of a torturing environment in Syrian detention facilities, including AFI Mezzeh, in which government actors employ a variety of psychological torture methods. These methods include threats, as described further below, in addition to forced nudity,³³ verbal sexualized abuse,³⁴ humiliation,³⁵ food deprivation,³⁶

²⁸ Pérez-Sales, *supra* note 4, at 451.

²⁹ Ergün Cakal, *Perception, Practice and Proximity. Qualifying Threats as Psychological Torture in International Law*, 31(1) TORTURE J. 19, 20 (2021).

³⁰ Pérez-Sales & Sveass, *supra* note 5, at 212.

³¹ Pérez-Sales & Petersen, *supra* note 10, at 500.

³² *Id.* at 501.

³³ Coleen Kivlahan et al., *Long-term Physical and Psychological Symptoms in Syrian Men Subjected to Detention, Conflict-related Sexual Violence and Torture: Cohort Study of Self-reported Symptom Evolution*, 67 LANCET 1, 7 (2023) (finding that 97.2% of Syrian former detainees surveyed were subjected to forced nudity).

³⁴ *Id.* (finding that 94.3% of Syrian former detainees surveyed were subject to verbal sexualized abuse).

³⁵ Syrian Network for Human Rights, *Documentation of 72 Torture Methods the Syrian Regime Continues to Practice in its Detention Centers and Military Hospitals* 31 (Oct. 2019),

https://snhr.org/wp-content/pdf/english/Documentation_of_72_Torture_Methods_the_Syrian_Regime_Continues_to_Practice_in_Its_Detention_Centers_and_Military_Hospitals_en.pdf (describing interrogators forcing detainees to carry out acts including kissing interrogators’ shoes or licking toilet bowls); *Id.* at 31 (describing forcing detainees to kiss an image of Bashar Al Assad and say that he is the detainee’s Lord); Amnesty Int’l, *‘It Breaks the Human’: Torture, Disease and Death in Syria’s Prisons*, AI Index MDE 24/4508/2016, at 43 (Aug. 18, 2016) (describing a detainee’s experience being forced to take excrement from the toilet and cover himself in it).

³⁶ Human Rights Watch, *If the Dead Could Speak: Mass Deaths and Torture in Syria’s Detention Facilities* 66 (Dec. 15, 2015) (describing detainees receiving small amounts of food that they were forced to allocate amongst themselves); *Id.* at 67 (describing a detainee receiving

mock executions,³⁷ and overcrowded and unhygienic conditions.³⁸ This report will focus primarily on the psychological impact of the torture technique of being forced to witness or listen to the torture of other detainees and family members, a form of psychological torture which Plaintiff Mzaik experienced while detained in AFI Mezzeh.

26. One 2023 study of 106 Syrian male former detainees found that 78.3% of those surveyed were subjected to threats while in detention.³⁹ The nature of these threats varied. 58.5% of those surveyed reported threats of sexual violence toward female loved ones, 70.7% reported threats against themselves, 34.9% were threatened with rape, and 38.7% were threatened with sterilization or castration.⁴⁰

27. Threats against family members is a commonly used torture method that is intended to cultivate feelings of anxiety and despair in victims.⁴¹ The Istanbul Protocol, which outlines international legal standards and sets out specific guidelines on how to document and conduct effective legal and medical investigations into allegations of torture and ill-treatment, recognizes threats as a torture method, and specifically refers to threats of harm to family as a type of threat that can amount to torture.⁴² These threats play a key role in breaking the will of torture victims, and research shows that the use of threats can create a deep and permanent anguish in torture survivors over time.⁴³ Threats have a cumulative effect when they are chronic, or when they are combined with other torture methods.⁴⁴ For instance, neurological imaging research shows that 24 hours of sleep deprivation increases fear responses in people who are exposed to threats.⁴⁵ While the impact of threats varies from survivor to survivor, they can cause severe and long-lasting psychological harm, particularly when compounded by the use of other torture methods.

five spoons of yogurt for breakfast, with a piece of bread for each, and a handful of boiled bulgur and five boiled eggs to share among eight detainees).

³⁷ AMNESTY INT’L, *supra* note 35, at 33 (describing the mock execution of four detainees).

³⁸ HUMAN RIGHTS COUNCIL, *Out of Sight, Out of Mind: Deaths in Detention in the Syrian Arab Republic*, U.N. Doc. A/HRC/31/CRP.1, 6 (Feb. 2016) (describing documentation showing that many prisoners died from severe diarrhea caused by unhygienic detention conditions); HUMAN RIGHTS WATCH, *supra* note 36, at 66 (stating that out of 37 detainees interviewed by Human Rights Watch, only two had access to a washroom or toilet in their cell).

³⁹ Kivlahan et al., *supra* note 33, at 7.

⁴⁰ *Id.* at 6.

⁴¹ Pérez-Sales, *supra* note 9, at 57.

⁴² U.N. OFFICE OF THE HIGH COMMISSIONER FOR HUMAN RIGHTS, *Istanbul Protocol: Manual on the Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment*, art. 372, U.N. Doc. HR/P/PT/8/Rev.2 (2022), https://www.ohchr.org/sites/default/files/documents/publications/2022-06-29/Istanbul-Protocol_Rev2_EN.pdf (“The distinction between physical and psychological methods of torture is artificial.”).

⁴³ Pérez-Sales & Sveass, *supra* note 5, at 213.

⁴⁴ Pérez-Sales, *supra* note 9, at 59.

⁴⁵ Pan Feng et al., *Sleep Deprivation Affects Fear Memory Consolidation: Bi-stable Amygdala Connectivity with Insula and Ventromedial Prefrontal Cortex*, 13(2) SOC. COGNITIVE & AFFECTIVE NEUROSCIENCE 145, 145-55 (2017).

28. In interviews, many former Syrian detainees – including those held at AFI facilities – have described instances in which government agents forced them to witness or listen to the torture of family members. Amnesty International reported that Syrian government actors have obtained forced confessions through the torture of friends, family, or acquaintances.⁴⁶ Detainees interviewed by Amnesty International described “confessing” to the acts that they were accused of to protect their friends or family.⁴⁷ For example, one former detainee, a law student at Aleppo University, recounted an incident during which government agents had removed her clothing, beaten her, and threatened to rape her if her mother refused to confess:

“Once they take you to the interrogation room, your hands are tied and you are blindfolded. They told my mother, ‘We will bring your daughter and rape her.’ They brought me from my cell but I was blindfolded, I couldn’t see. They asked me to lie on the floor and started taking my clothes off. I started shouting, my mother heard me, and they started beating me. I heard my mother say, ‘I confess! I’ll tell you!’ Then they took me back to my cell and my mother confessed everything she knew ... If my mother hadn’t confessed, they would have raped me. It happened to another girl; they had brought her brother and her father. They do this systematically. I wasn’t the first and I won’t be the last.”⁴⁸

29. Other detainees have recounted instances during which Syrian government agents forced them to listen to the torture of other detainees, including at AFI detention facilities. For example, one former detainee, a law student at Aleppo University, told Amnesty International about an incident during which, after several days of physical torture, AFI agents forced him to listen to his mother being beaten:

“One of the investigators brought a piece of paper that said I was responsible for planting a bomb in Aleppo, with my mother ... They forced me to put my fingerprint on the paper. They said they would bring my mother into the cell to confirm it. They took me to the wall, and made me face it, so I couldn’t see the room. I heard that they had brought a woman in, and she was screaming. I could hear the sound of the stick, beating the woman’s abaya [full-length robe]. Again and again the stick would hit the fabric. They said, “Are you happy now? We brought your mother to prove what you did.”⁴⁹

30. Former detainees told Amnesty International that they suffered extreme terror and anguish because they witnessed or listened to the torture of others, or because they saw the effects on cellmates who had returned from torture

⁴⁶ AMNESTY INT’L, *supra* note 35, at 21.

⁴⁷ *Id.* at 24.

⁴⁸ *Id.* at 30.

⁴⁹ *Id.* at 32.

sessions.⁵⁰ Some detainees described the experience of listening to the torture of others as more difficult than physical torture.⁵¹ For example, Abu Anas, a businessman detained at the AFI branch in Aleppo, described an instance during which AFI agents forced him to watch the execution of another detainee:

“[The interrogator] asked me to come to his office again late at night. He told me: “You can’t go out this time. I am dangerous. I have the ability to kill you here, and no one will ask questions. I can help you, if you pay me again US\$100,000, or more, and you have to write a certificate that you will leave the country,” Then he took me into the basement. There it was him, me, and two other men. One was the director of the branch, the other a captain from Air Force Intelligence who had defected. The major said to the defector: “You are a captain in Air Force Intelligence. You are a traitor. We charge you with treason and a traitor should be killed.” He shot the man in the head. When I witnessed this, I collapsed. I screamed and shouted. He sent me out of the room and back to my cell. [He said:] “You think about my offer until tomorrow.”⁵²

31. Reem, a student studying for a master’s degree in theatre studies detained at the AFI branch in Aleppo, described being forced to witness the torture of other detainees almost daily:

“I was taken to the shabeh [torture] area almost every day, and I had to sit there and watch the guards beat the male detainees for an hour... The guards beat them with different objects, they used the green hose, a silicone bar, and an iron bar that had a ball with spikes at the top. There was one young man. When I saw him hanging there again on the way to the bathroom, I wanted to tell him not to be afraid, that he was not alone...I was made to watch as a punishment, to break my composure, but they also wanted to see if I had any reactions to any of the men they were torturing. They wanted to know if we had a relationship with any of them, so they could accuse us again of being terrorists.”⁵³

32. Tareq, a detainee held at the Military Intelligence Branch in Kafr Sousseh in July 2011 described being forced to watch the torture of another detainee:

“They took me to an interrogation room in the basement. The officer said “Bring Khalid.” ... I was at the back so couldn’t see Khalid well, but they pulled down his trousers. He had an injury on his upper left leg. Then the

⁵⁰ Amnesty Int’l, *I Wanted to Die’: Syria’s Torture Survivors Speak Out*, AI Index MDE 24/016/2012, at 24 (Mar.14, 2012).

⁵¹ See, eg., *id.* at 24 (Recounting a detainee’s testimony regarding being forced to listen to torture: “I could hear people screaming from the torture, which was worse than physical torture.” Another former detainee stated, “I heard the screams of those being tortured for 24 hours a day. While in the cell we were busy praying for the safety of those who are being tortured.”).

⁵² AMNESTY INT’L, *supra* note 35, at 33.

⁵³ *Id.* at 33-34.

official raped him up against the wall. Khalid just cried during it, beating his head on the wall.”⁵⁴

33. Another former detainee told the European Center for Constitutional and Human Rights (“ECCHR”) that during her time in detention, she was regularly forced to witness the torture of other prisoners while simultaneously being forced to stand on one leg:

“Interrogations were conducted in the hallway. During the first ten days of my imprisonment, I was regularly taken out of my cell, and forced to stand in the hall on one leg while I witnessed the torture of other inmates. The head of the prison had people taken from their cells to torture them with a hose, hard plastic tube, or cable.”⁵⁵

34. These torture methods have been documented to cause long-term psychological harm in Syrian detainees. One 2023 study of male Syrian former detainees found that intrusive memories, anger, sadness, low self-esteem, insomnia, and self-isolation continued to persist for years after detention.⁵⁶ Many years after detention, nightmares impacted 45.3% of study participants.⁵⁷

C. Psychological Torture Inflicted on Plaintiff Mzaik

35. During my Assessment of the Plaintiff, he detailed a torturing environment consistent with that described by other former detainees. It is my expert opinion that Plaintiff was subjected over “a prolonged period of time to a torturing environment of extreme gravity,” amounting to psychological torture.⁵⁸
36. Plaintiff describes the frequent use of threats,⁵⁹ including death threats,⁶⁰ being forced to witness and listen to the torture of other detainees,⁶¹ and being forced to listen to the torture of his own cousin, who was then taken away and never heard from again.⁶² Plaintiff was forced to endure an environment in which he felt he could be killed at any time.⁶³
37. Further, Plaintiff Mzaik describes being forced to endure humiliation throughout his time in detention. He describes being stripped naked on multiple occasions,⁶⁴ and being subjected to threats of sexual assault.⁶⁵

⁵⁴ AMNESTY INT’L, *supra* note 50, at 24.

⁵⁵ European Center for Constitutional and Human Rights, *Human Rights Violations in Syria: Torture Under Assad* 7 (Mar. 2021).

⁵⁶ Kivlahan et al., *supra* note 33, at 1.

⁵⁷ *Id.* at 7.

⁵⁸ *See* Exhibit B (Assessment) at 11.

⁵⁹ *Id.* at 1, 4.

⁶⁰ *Id.* at 4.

⁶¹ *Id.* at 5.

⁶² *Id.*

⁶³ *Id.* at 5-6.

⁶⁴ *Id.* at 6.

⁶⁵ *Id.*

38. Plaintiff Mzaik also describes overcrowded and unhygienic living conditions, including being held in an eight-foot by three-foot cell with other detainees, without enough space for all occupants to lie flat simultaneously to sleep.⁶⁶ He describes not being permitted to shower.⁶⁷ He describes experiencing frigid winter temperatures in an unheated cell with no blankets,⁶⁸ and states that ticks, lice, and insects were rampant in the detention center, including in his clothing.⁶⁹ Like the rest of the detainees, Plaintiff was prohibited from praying.⁷⁰
39. Plaintiff Mzaik describes experiencing severe psychological harm, both during his time in detention, and in the years that followed. During his time in detention, he actively hoped for his own death to escape the misery of his detention.⁷¹ He felt an absolute loss of his personal autonomy and was subjected to an environment in which it was impossible to predict if and when he would be tortured.⁷² Plaintiff states that “every aspect in that place was designed to ... to provoke you to terror, to humiliate you.”⁷³
40. Plaintiff’s experience in detention caused him to suffer from severe post-traumatic stress disorder (PTSD). While those PTSD symptoms have progressively subsided over time, the trauma of his experience has left permanent sequelae, including damage to his belief in the goodness of human beings, in the possibility of trusting them, in the capacity to feel affection for other people, and in the perception of the future as a space in which he can develop personally.
41. Plaintiff’s diagnosis is in keeping with the broader medical literature on exposure to psychological torture and a torturing environment, which shows that Syrian detainees who have been subject to detention and torture, are likely to suffer long-term psychological harm, including anxiety disorders, PTSD and complex PTSD, personality changes, drug addictions, and chronic depressive disorders.⁷⁴ These effects could be significant and long-lasting, particularly where detainees, like Plaintiff Mzaik, have been subjected to harmful psychological and physical torture methods being used simultaneously within a torturing environment.

IV. CONCLUSION

42. Documentation from the United Nations and civil society organizations shows that psychological torture methods are being regularly used in government-run detention facilities in Syria, including AFI Mezzeh. Such methods include threats, humiliation, food deprivation, mock executions, and subjecting detainees to overcrowding and unhygienic conditions. The documentation further demonstrates that on many occasions, detainees have been forced to

⁶⁶ *Id.* at 2.

⁶⁷ *Id.* at 3.

⁶⁸ *Id.* at 2-3.

⁶⁹ *Id.*

⁷⁰ *Id.* at 8.

⁷¹ *Id.* at 5-6.

⁷² *Id.* at 9.

⁷³ *Id.*

⁷⁴ Pérez-Sales & Petersen, *supra* note 10, at 493.

witness the torture of other prisoners, including the torture of family members. Syrian government agents have also regularly threatened to harm the family and friends of detainees as a means of extracting confessions. Plaintiff Mzaik describes being repeatedly subjected to many of the aforementioned psychological torture techniques by Syrian government forces at AFI Mezzeh.

43. The use of these psychological torture techniques in Syrian detention centers is likely to cause significant long-term psychological harm to victims like Plaintiff Mzaik. This is particularly true given that Syrian government forces are using these techniques in conjunction with one another, creating a torturing environment that is designed to cause an identity breakdown, create submission, and destroy dignity and will in detainees.

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

Executed on this 16th day of November 2024 in _Madrid (Spain)_____.

Dr. Pau Pérez-Sales

EXHIBIT A:
PAU PÉREZ-SALES CURRICULUM VITAE

EXPERIENCE AND EDUCATION

- *Degree in Medicine (University of Barcelona / Universidad de Barcelona, 1987). Specialty in Psychiatry (Hospital La Paz, Madrid, 1994). PhD in Psychiatry (Autonomous University of Madrid / Universidad Autonoma de Madrid, 1994).*
- *Consultant. Department of Psychiatry (Hospital Universitario La Paz – Madrid) (since 1996).*
- *Regional Mental Health Department. Ministry of Health. Nicaragua (Estelí, Region of las Segovias) (1987-1989) – Clinical and Community Work.*
- *Collaboration in different popular organizations in El Salvador and Guatemala (1989-90) related to mental health and human rights areas.*
- *Advisor and working team – Report ‘Guatemala Never Again’/”Guatemala Nunca Mas” – Office of Human Rights of the Bishop of Guatemala (1989-90).*
- *Consultant to the Psychosocial Area of the Truth and Reconciliation Commission of Peru.*
- *Visiting Professor of Anthropology at the Catholic University of Temuco (Chile) (1995-1998). Member of the Centre for Research and Promotion of Human Rights (CINPRODH)*
- *Visiting Professor, among others, in the Jose Simeon Cañas University (El Salvador) [2001], the Universidad Nacional San Carlos (Guatemala) [2002], University of Pennsylvania (USA) [2005], University of El Bosque (Colombia) [2007], Universidad Nacional (Colombia) [2009], Universidad Pontificia (Peru) [2008], Universidad Nacional de la Republica (Montevideo) [2012], Universidad Iberoamericana (Mexico) [2017] teaching or coordinating modules on psychosocial work in political violence and community disaster management, psychotherapy and care for victims.*
- *Associate Researcher – Human Rights Center Miguel Agustín Pro Juárez (Mexico DF, 2001)*
- *Advisor of the Ethics Committee of the Movement of Victims of State Crimes in Colombia. Consultant – Comprehensive Care of Victims Bill – Ministry of Social Protection [2009-2010]*
- *Director of the Postgraduate degree on Mental Health in Political Violence and Catastrophes (250 h) (GAC – Universidad Complutense de Madrid). [since 1990]*
- *Director Post Graduate Degree on Psychosocial Work in War and Political Violence (On-Line Training 450 h) [1994-2014]*
- *Regularly teaching, among others, at the National University of Distance Education (UNED, 2001-2007), University Carlos III of Madrid (2002), University Complutense of Madrid (2001), University of Alcalá de Henares (since 1999) and Autonomous University of Barcelona (since 2007)*
- *Founder and Coordinator of the Grupo de Accion Comunitaria / Community Action Group - Resource Center of Mental Health and Human Rights [1997-2012].*
- *Coordinator of the Mental Health Group of ‘Médicos del Mundo’ (Doctors of the World) (1998-2002) implementing and supervising programs in Chiapas, El Salvador, Palestine, Kosova or Sri Lanka. Colaborator of ‘Entrepobles’, Association against Torture, International Peace Brigades, CEAR and Amnesty International.*

- *Psychosocial Health Technician Medicos Sin Fronteras (MSF) – Doctors without Borders – Spain (2001-2004), implementing and supervising programs in Spain, Morocco, Ecuador, Colombia.*
- *Member of the Task Force of the Inter Agency Standing Comitee (IASC) on Mental Health and Psychosocial Support in Emergency settings. Member of the Drafting Group and coordinator of the Spanish version edition.*
- *Consultant to the World Health Organization on Human Violence and Emergencies and Catastrophes. Member of the International Advisory Group for the HESPER Program (Elaboration of an international consensus tool for the detection of the needs of refugees and siplaced populations (World Health Organization-Psychiatric Institute-London). Consultant for the Rapid Assessment in Emergencies Program (WHO Assessment Toolkit), Handbook of Psychosocial First Aid Procedures in Emergencies (PFA-Guide) and Essential Kit of psychotropic drugs in emergencies (Interagency Basic Emergency Kit – Psychiatry). UNICEF Consultant for Installation of Friendly Spaces in Disaster Areas (Child Friendly Space in Emergencies).*
- *Associate editor of Intervention – International Journal of Mental Health, Psychosocial Work and Counselling in Areas of Armed Conflict (2003-2019)*
- *Expert Advisor to the National Mecanism for Prevention of Torture (NPM) – Spain (OPCAT). Office of the Ombudsman. (Since 2010). Multidisciplinaty Visits to internment and detention centers in Spain (Centres for Minors, Reform Centres, Prisons, Psychiatric Internment Centers).*
- *Advisor to the National Mechanism for the Prevention of Torture of the Republic of Nicaragua (2014-2016), Ecuador (2016), Mexico (2018) and Brazil (2015-2019). Documentation of cases, training, supervision and visits to detention centers*
- *Member of the Working Group for the Istambul Protocol Supplementation Guideline (2017)*
- *Member of the Working Group on Developing Guidelines on Non-Coercive Interviewing and Associated Safeguards (2017-)*
- *Founding Member and President (2008-2010) of the Human Rights Section of the Spanish Association of Neuropsychiatry.*
- *Elected member of the Board of the International Society for Health and Human Rights (ISHHR) (2011-2017)*
- *Board Member (2014-2015) and Chair, Section of Psychological Consequences of Persecution and Torture, World Psychiatric Association (2015-2018)*
- *Forensic expert in national and international courts for victims of mistreatment and violence (since 1996). Litigation in European Court of Human Rights, InterAmerican Court of Human Rights among others*
- *Trainer in Forensic documentation of ill-treatment and torture. Istanbul Protocol (since 2004).*
- *Clinical Director of the SiR[a] Network for Assessment and Rehabilitation of Victims of Violence. <http://redsira.psicosocial.net/>*
- *Editor-in-Chief. Torture Journal. <https://tidsskrift.dk/torture-journal>*

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EXHIBIT B:
ASSESSMENT OF TORTURE METHODS ACCORDING TO THE
TORTURING ENVIRONMENTS MODEL, CLINICAL IMPACTS AND
CONSISTENCY OF FINDINGS

Pau Pérez-Sales
Clinical Director SiRa Centre

1. Aggressions against their physical integrity: consisting in

1.1.Mr. Mzaik was beaten dozens of times during his detention, especially during interrogations. These **beatings were often preceded by “incomplete” assaults**, carried out to create a feeling of helplessness, as a foretaste of the treatment that awaited him.

Thus, when he was transferred from a branch of the Political Security Administration in the al-Fahamah neighborhood of Damascus to the Air Force Intelligence Directorate central branch at Mezzeh Military Airport , **Mr Mzaik was grabbed by the neck against a wall by a soldier, applying suffocation methods to him, an assault that was interrupted by another soldier:**

“The first day I arrived in that prison, a soldier grabbed my neck against the wall and started squeezing... I was choking... I thought he was trying to kill me this way... But another soldier stopped him. Then, I thought it was the beginning of what was going to happen....”

1.2.Collective assaults as a “welcome ritual.” Mr Mzaik describes a “welcome party” when he was transferred, a week after his arrest, to AFID's central branch at Mezzeh Military Airport (Air Force Intelligence Directorate), marked by physical assaults and threats of physical and sexual assault, intended to make him anticipate the treatment he would receive during his stay at the facility. Mr Mzaik describes being forced, hooded and handcuffed, through a “corridor” of soldiers, who beat him as he tried to move forward:

“The “welcome party” was a long hallway of soldiers... I was hooded, so I couldn't see, but they all started hitting me and I was running, trying to move forward. I got hit all over the place.”

“The worst, actually, was not that. They told the soldiers that they couldn't kill us until we signed the transfer paper... as a warning. And then they threatened me with sexual assault...” (See point 2.3.2).

1.3.During interrogations at Mezzeh Military Airport, Mr Mzaik was repeatedly beaten by various methods:

- **Blows made with fists and legs**, in the form of kicks and punches or slaps: *“I don't know how many times I was beaten, but there were many, many times. During the interrogations. They punched and kicked me all the time.”*
- **Blows made with blunt objects**, such as hoses: *“Sometimes I was beaten with hoses.”*

- **Beatings received when he was immobilized**, handcuffed behind his back: *“All the blows were given to me when I was hooded and handcuffed, lying on the ground, sometimes standing up, but with no possibility of defense...”*
- **Falanga**, or blows on the soles of the feet with a truncheon or a stick:⁷⁵ *“The most painful thing was the torture on my feet. I was beaten only once, but I don't forget it. It was with a PVC pipe, a PVC flex pipe. I don't know how many times, maybe around 45 blows, but it was very painful. Afterwards I couldn't walk, or stand up on my feet. They were swollen, it hurt a lot to walk...”*

1.4. While waiting for interrogations, Mr. Mzaik was subjected **to stressful positions** for hours, listening to the screams of those being interrogated and tortured before their turn:

“It happened to me on two occasions, at the Air Force center. The first, after an argument between two interrogators who alternated roles, I was forced to sit in the corridor for seven hours: hooded, with my head backwards, on the floor, waiting for seven hours. In the hallway, next to other people who were tortured in the room, waiting for my turn. The second time, also before being interrogated, I was sitting all night in the corridor, in the same position.”

2. Psychological torture

Mr. Mzaik was subjected to numerous methods of psychological torture, including:

2.1. Basic functions:

The percipient was subjected to continuous alterations of his basic functions during his detention, among which we can point out:

2.1.1. Inhumane detention conditions

Mr. Mzaik was confined in cramped and overcrowded cells, where they could not lie down at the same time and had to lie on their sides:

“The cells I was in were 2.5x1 meters (8x3 feet). And there were always too many people, so you could stand, but not lie on your back. You couldn't rest at night, because you had to lie on your side. If there were five of us, we couldn't fit lying down...”

2.1.2. Environmental conditions

Mr. Mzaik was confined in cold cells overcrowded with insects (lice, ticks...):

⁷⁵ Dr. Nicholas Gage, quoted by Edward Peters, describes it this way: *“Each blow of the rod is not only felt on the soles of the feet, painfully bent upward as the stick crushes the delicate nerves between the heel and the metatarsal eminences of the feet; the pain shoots up the extended muscles of the leg and explodes in the back of the skull. The whole body suffers atrociously and the victim writhes like a worm. (...) The victim immediately feels pain and swelling, and the latter extends upwards, up to beyond the ankle. The functioning of the ankles, feet and toes is reduced. In half of the cases subsequently examined by experts, the chronic sequelae of falanga subsist from two to seven years after the application of torture.”* EDWARDS PETERS, LA TORTURA (1987).

- **Cold**
“It was very cold in February. And we were underground. It was very cold. We had no blankets or warm clothes.”
- **Insects**
“In the cells there were a lot of insects... It was desperate, because if you took off your shirt, you felt relief, but you were freezing cold, so you tried to remove the insects and put your clothes back on... but then the insects attacked you again...”

2.1.3. Alteration of basic physiological functions:

During his detention, the percipient was limited in his basic physiological functions, among which the following should be highlighted:

- **Limitations on bathroom access:**
“We were only allowed to go to the bathroom three times a day: after breakfast, after lunch and after dinner. They made us go in our underwear. And we had about a minute, sometimes 30 seconds, and, if you took too long, they would beat you. The bathrooms were in unsanitary conditions...”
- **Limitations on toilet access:**
“They wouldn’t let us take a shower. They only let you shower when you were about to go out. We all smelled very bad, the stench was unbearable...”
- **Dehydration or thirst torture**
“To drink, they gave us a cup for all of us. From time to time, they would give us a cup for all of us in the cell...”
- **Malnutrition or starvation torture**
“They gave us very little food. In the morning, an egg or something like that. At lunch, a plate of food that we had to share among all of us. For dinner, just potatoes. It wasn’t enough for all of us. They gave you food three times a day, but in very small quantities.”
“I lost a lot of weight. When I came out, I was very thin. I could see my - I could see my bones. My face was very thin, sucked out.”

2.1.4. Sleep disturbances

As interrogations took place at night, the detainees were kept in a state of constant expectation that affected their sleep:

“Most of the interrogations happened after eight o'clock at night. At that time, we were all scared, because we didn't know if the doors would open and they would pick one of us to go to the interrogations. No one slept, waiting for the door to open and touch you...”

2.1.5. Sensory deprivation

Mr. Mzaik remained hooded and with his hands cuffed behind his back each time he was taken out of the cell:

“We were hooded every time we came out of the cell. We couldn’t see the soldier, couldn’t see the detective; that’s one of the rules. And we always had to be handcuffed backwards, and not forwards.”

2.1.6. Denial of medical treatment

He points out not only the impossibility of requesting medical assistance, but also having witnessed reprisals against those who dared to ask for it:

“We didn’t have access to the doctor. I remember one person got sick and needed his medicine urgently. He asked for his medicine and they beat him...”

2.2. Fear-generating factors

Mr. Mzaik describes a set of terror-generating factors, including:

2.2.1. Games with expectations and hopes

Specifically, he recounts being painfully exposed to a mock liberation, which in reality was only a visit from his father:

“One day, they made me go to the bathroom... As we all knew, when they let you take a shower, that meant they were going to release you. So I was very excited and I took a shower; they even left me for 2 or 3 minutes. They took me to another building and there was my father, with a general... And my father looked at him and told me that he was just there to visit me... It was very hard... I had hopes of getting out and suddenly the hope was broken. It’s a form of psychological torture: they make you believe you’re going to get out and then they put you back in your cell... I thought I would never get out of there...”

2.2.2. Threats against the person:

The examinee suffered indirect threats of aggression upon his arrival at AFID’s central branch:

“When they transferred me to the Air Force Security Forces, they started saying that they needed me to sign a paper, and they told the soldiers that they couldn’t kill us before we signed the paper....”

Other threats were more explicit, at AFID's central branch in Mezzeh, when he was told that he would be subjected to the same methods of torture as the relative who was tortured in his presence:

“One of the threats was that they told me they were going to torture me like they had done to my second cousin, that they were going to hang me from the wall... I had just seen them do it to him and heard his screams... He also threatened me with electrical torture.”

2.2.3. Threats against family and friends

Mr. Mzaik reports having received threats against his family and friends after his release through his social networks:

“After I got out of prison, I received threats from one of them through my own Skype account... at first, indirect threats, but last week they threatened my family...”

“My friends have also received messages through my social networks.”

2.2.4. Being forced to witness the torture of family members

The examinee and his second cousin were interrogated together and, when both denied having participated in anti-regime activities, their relative, who had already been tortured, was again hung from the ceiling:

“I saw my relative, my second cousin, hanging on the wall. They had done it to him before, he had marks on his wrists, he had almost no skin. And they hung him, so I could hear his screams... I never saw him again...”

2.2.5. Being forced to witness torture on third parties

When taken out for interrogation, the examinee was forced to witness how other detainees were tortured in the corridors, or waiting to be hanged:

“I could see them, hanging from the ceiling and screaming. Or those who were waiting their turn to be hanged, kneeling in the corridor, hooded...”

2.2.6. Being forced to listen to torture on third parties

On several occasions, he was forced to listen to the application of torture methods on other detainees:

“I was forced to listen to the torture of other people while I was waiting in the corridor. Also when I was in the cell that was next to the corridor where they were hanging them... I was very close, so I could hear everything, I could hear their screams...”

In addition, he was forced to listen to what he presumes were electric shocks on other detainees:

“I also heard what I imagine was electrical torture. I listened when they threw water on them, and the screams...”

2.2.7. Perception of imminent death

The examinee describes an environment in which he could be killed at any time:

“The atmosphere during detention and interrogation was very scary. Those people didn’t care about killing you or not killing you... Of course, the sense of terror I had was very great... because your expectations were that you would not be released, that you would not get out of there alive.”

He points out that this made him actively wish for death:

“During the torture I just hoped to die as soon as possible, so they wouldn't beat me anymore. I didn't want to be tortured anymore, I just thought about dying as soon as possible so I wouldn't have to go through that again.”

2.3. Attacks on sexual integrity:

2.3.1. Forced nudity:

Mr. Mzaik was subjected to humiliations such as **forced nudity** in the presence of numerous soldiers upon his arrival at AFID's central branch at Mezzeh Military Airport:

“When I arrived, they made me undress. They made me undress completely. I was in front of many soldiers. They all looked at me and laughed, some beat me. It was very humiliating.”

He also states that, **twice a day** during their stay in this center, **they were forced to undress down to their underwear and were taken to the bathroom:**

“For me it was very humiliating when we were taken to the bathroom, twice a day. We had to go naked, except for our underwear. We were not completely naked, but they would take us in our underwear running to the bathroom. It was humiliating.”

2.3.2. Threats of sexual assault

The examinee was subjected to threats of sexual assault after his arrival at Mezzeh Military Airport and the “welcome rite”:

“After the ‘welcome party’... there were two soldiers, Navy soldiers, and at one point they told me that ‘they were going to give me a gift today.’ Because of the way they said it, I felt super nervous, super scared... I felt they were going to rape me...”

2.4. Disorientation-producing actions

Mr. Mzaik was subjected to various actions aimed at generating disorientation, among which the following stand out:

2.4.1. Alternation of roles among interrogators

On one occasion, he was subjected to an alternation of roles between two interrogators:

“I can remember one time, one of the detectives decided to talk to me politely. He asked me to go to a room, had a soldier remove my hood and directed me to sit in the chair. I was surprised. He spoke to me politely. But only after a few minutes, another detective came in and this one told him what I was doing sitting there, ‘that the dogs were sitting on the floor.’ They started arguing... One playing the good detective and the other playing the sadistic detective. And they pretended to argue, I guess to get you to talk to the good detective...”

2.4.2. Friendly treatment, generator of disorientation

In addition, he refers to another episode in which a detective was talking for hours with him, in a friendly manner:

“Another time it was...not in the Air Force, an earlier episode. It was a long conversation with a detective, for hours. He was trying to be my friend. He tried to convince me of... ‘what was going on’: that they were good and that they treated people right. He even allowed me to argue with him...”

2.4.3. Periods of alternation between strokes and standby

Mr. Mzaik describes long periods of uncertainty as to whether they would be questioned:

“Every day, every night, we thought it would be our turn or somebody else's turn. It terrified me, all the time thinking 'what's going to happen?' Because the torture would start when you got to the detective, who would start asking questions. But the wait until they took you to the detective was also torture...”

“It was the same when they kept you waiting in the hallway, not knowing if they were going to interrogate you, torture you...sometimes for hours.”

2.4.4. Proposals for disclosure

During the interview with his father, Mr. Mzaik was threatened that he would be forced to work as a confidential informant for the Air Force Intelligence Directorate after his release:

“When they took me to see my father, there was General Abessanab. And he promised me that they would make me work with them was going to work with me after I was released. That made me an informant...”

2.5. Identity attacks

2.5.1. Imposition of identity/objectives

The examinee describes an attempt to make him believe in his own complicity with foreign agents operating against Syria:

“One of the detectives spent hours trying to convince me that we were being attacked by foreign countries. And that people like me were collaborating with them, allowing them to take advantage of the situation... He was trying to program in my mind... he wanted to make me believe that we were putting the country in the hands of foreigners...”

To this end, he notes that they also used materials seized from his own personal computer:

“One of the videos they saw on my computer, it was a presentation I did at Oakland Community College about what was going on in Syria. So they tried to convince me that I was working with some politicians in the United States through my social media. Which is not true.”

For the same purpose, his social networks were tracked after he was forced to hand over his personal passwords:

“They forced me to give them the passwords to my networks, to see everything and try to know what my ideology was. And then, they also used my social networks to talk to some people around me, to send threats when I was at liberty...”

2.5.2. Forced guilt

The examinee claims to have been forced to provide names of third parties under torture. Although he provided false information, nicknames or names of people who were not in the country, the disappearance of his second cousin was used to generate suspicion of his guilt for having returned alive:

“If I stop giving them false information or making scenarios that satisfy them, then they will torture me, because what they want are names. So, to keep them from torturing me, I give them false names, or nicknames... sometimes names of acquaintances who were not in Syria... but that didn’t always work. My cousin, thinking I was not in the country, gave my name... and then they brought him in to interrogate us together... and what happened happened... my second cousin disappeared. His family feels that, if they released me, that means I gave information about him, which is not true... They make me feel guilty because he didn’t come back.”

2.5.3. Violation of moral principles: prohibition of prayer

Mr. Mzaik was subjected, like the rest of the detainees, to a ban on praying, as they were considered “bad Muslims,” which forced them to pray in silence, without moving:

“We couldn’t pray, we can’t do anything religious there, because you were considered cursed and they didn’t want you to pray. So, to pray, we had to pray with our eyes, without any other movement...”

2.5.4. Inducement to humiliation. Being forced to sign a false confession

The examinee was also forced to sign a self-incrimination, in which he declared that he was part of an opposition group to the Syrian government:

“They made me sign that I was part of a group against the regime, that I was carrying out actions at the university, in other places... That’s what I confessed. What they made me confess and sign...”

2.6. Modes of interaction

Finally, Mr. Mzaik was subjected to a set of modes of interaction that infringed on his autonomy and his ability to control what was happening:

2.6.1. Violation of personal autonomy

On the one hand, he reports an absolute loss of his personal autonomy over events during his detention:

“It’s like you had no control over anything. They decided when they took you to the bathroom, how much you ate, when they interrogated you. You could only defy that by trying to pray without them noticing or by wishing for death...”

2.6.2. Unpredictability

Moreover, he was subjected to a context in which it was impossible to predict whether or not he would be tortured:

“So, I feel like my turn is going to happen, but it's not yet. It's not yet. They were trying to get me to feel the atmosphere, waiting in the hallway. ‘What’s going to happen to me?’ And then they're going to start the tortures. Or not. Sometimes they'd keep you waiting for hours and they wouldn't torture you.”

2.6.3. Systematic violation of dignity

All this, in a context of continuous violations of the examinee’s dignity, especially by the soldiers guarding them:

“The way the soldiers addressed you was...always humiliating. They shouted, they treated you with very little respect. And, when they hit you, they always used insults, very bad words... as if you were an animal; they treated us as if we were animals...”

“But I think every aspect in that place was designed to... to provoke you to terror, to humiliate you...”

Part 1	C-L	Yes	CF	Score	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	I		
Block 1. Contextual manipulations		7		14																	X		
Block 2. Fear-producing actions		7		14																	X		
Block 3. Pain-producing actions		2	x2	8																	X		
Block 4. Extreme pain-mutilation – death		1	x2	4																	X		
Block 5. Sexual integrity		1	x2	4																			
Block 6. Attachment and need to belong		3	x2	12																	X		
Block 7. Actions targeting identity		2	6	14																	X		
Block 8. Coercive interrogation		1	3	x2	14																X		
Overall Score				84	Mark YES if there is either [a] at least one FULL criteria in any of the 8 Blocks, or [b] An overall score of 5 or more.															YES X	NO		
Part 2	C-L	Yes	Overall Score																YES	NO			
Relational Indicators		8	16	Mark YES if there are at least 2 FULL relational criteria or an overall score of 5 or more.															X				
Part 3	1	2	3	4	5	6																YES	NO
Legal Indicators	X	X	X	X	X	X	Mark YES if Legal criteria 1 and Legal criteria 3 or 4 (or both) are fulfilled. Exceptionally consider Criteria 6.															X	
Part 4	Yes																YES	NO					
Medico-Psychological Indicators	8	Mark YES if there is at least 1 Medico-Psychological criterion															X						
ENVIRONMENTAL CONDITIONS AMOUNT TO TORTURE	Conditions amount to Torture if <ul style="list-style-type: none"> Criteria of Part 1, 2 and 3 and fulfilled Allegations additionally supported if Criteria of Part 4 are fulfilled There is an overall consistency of allegations according to the SEF-IP 												NO	PARTIALLY	YES X								

The Torturing Environments Scale shows the severity of torture suffered by the survivor. It presents very high levels of torture through contextual manipulations (14/16), fear-producing actions (14/16), pain-producing actions (8/16) and extreme pain (4/16), attacks on sexual integrity (4/16), attacks on attachment and the need to belong (12/16), actions against identity (14/16) and cognitive manipulation through coercive interrogation techniques (14/16).

Overall, the Coercive Environment Scale shows a very serious situation of physical and psychological torture, with a score of 84/128, in the highest possible range.

Added to this are different indicators of psychological coercion, use of vulnerability factors, attacks on dignity and suppression of willpower, which together make up a torturing environment.

Psychological impacts

1. Psychometric analysis

PCL-C Posttraumatic Stress Scale (PTSD): 27. Indicates the existence of a residual disorder. The survivor presented in the past a severe post-traumatic stress disorder that progressively subsided over time. At the present time there are still feelings of anguish when something reminds him of the stressful experience, extreme avoidance attitude, trying to avoid contact with any element that reminds him of the events that happened and second stage insomnia with frequent nightmares whose contents remind him of the torture events suffered.

Beck Depression Scale (BDI): Indicates a mild-moderate depressive disorder characterized by sadness, anhedonia, irritability, secondary hyperphagia, anxiety and insomnia.

VIVO Life Impact Scale (VIVO): The scale profile (appendix) shows the difficulties in understanding why the events occurred. The perception of blockage during and after the events, with ruminations and experiences of guilt. The experience has not damaged his convictions, his sense of life or his self-confidence, but it has caused damage to his belief in the goodness of human beings, in the possibility of trusting them, in the capacity to feel affection for other people and in the perception of the future as a space in which he can develop personally.

2. Clinical interview

In the clinical interview, Mr. Mzaik shows the lasting impact of the events experienced, presenting anxiety symptoms with somatizations that coincide chronologically in their onset and evolution with the torture events experienced.

There is a high consistency between the methods of torture experienced and especially psychological torture and both clinical and existential impacts.

Mr. Mzaik was subjected over a prolonged period of time to a torturing environment of extreme gravity that has left permanent sequelae that would require psychotherapeutic elaboration when Mr. Mzaik is ready for it and can confront the memory of the events and the consequences they have had on his life.

EXHIBIT C:

INDEX OF MATERIALS CITED IN EXPERT REPORT OF DR. PAU PÉREZ-SALES

I. PUBLICLY AVAILABLE MATERIALS CITED IN EXPERT REPORT OF DR. PAU PÉREZ-SALES

A. Dr. Pau Pérez-Sales' Research and Scholarship:

No.	Description
1.	PAU PÉREZ-SALES, PSYCHOLOGICAL TORTURE: DEFINITION, EVALUATION, AND MEASUREMENT (2017).
2.	Pau Pérez-Sales et al., <i>Protocol on Medico-Legal Documentation of Sleep Deprivation</i> , 29(2) TORTURE J. 28 (2019), https://tidsskrift.dk/torture-journal/article/view/116320/164900 .
3.	Pau Pérez-Sales, <i>The 6/24 Rule: A Review and Proposal for an International Standard of a Minimum of Six Hours of Continuous Sleep in Detention Settings</i> , 29(3) TORTURE J. 1 (2019), https://tidsskrift.dk/torture-journal/article/view/116321/164918 .
4.	Pau Pérez-Sales & Nora Sveass, <i>Torture and the Role of the Psychological Profession</i> , in HUMAN RIGHTS EDUCATION FOR PSYCHOLOGISTS 207 (Polli Hagenaars et al. eds., 2020), https://www.pauperez.cat/wp-content/uploads/2022/11/Human-Rights-Education-for-Psychologists-1.pdf .
5.	Pau Pérez-Sales, <i>Psychological Torture</i> , in RESEARCH HANDBOOK ON TORTURE 432 (Malcolm D. Evans & Jens Modvig eds., 2020), https://www.pauperez.cat/wp-content/uploads/2022/11/Perez-Sales-Psychological-Torture-in-Research-Handbook-on-Torture.pdf .
6.	Pau Pérez-Sales, <i>Hunger: Deprivation and Manipulation of Food as a Torture Method. State of the Art in Research and Ways Forward</i> , 30(3) TORTURE J. 3 (2021), https://tidsskrift.dk/torture-journal/article/view/123318/171770 .
7.	Bernard Duhaime, Juan E. Méndez, & Pau Pérez-Sales, <i>Current Debates, Development and Challenges Regarding Enforced Disappearance as Torture</i> , 31(2) TORTURE J. 3 (2021), https://www.pauperez.cat/wp-content/uploads/2022/11/Duhaime-Mendez-Perez-sales-2021-Current-debates-development-and-challenges-regarding-enforced-disappearance-as-torture2.pdf .
8.	Pau Pérez-Sales, <i>Defining and Documenting Threats in the Context of Ill-treatment and Torture</i> , 31(1) TORTURE J. 3 (2021), https://tidsskrift.dk/torture-journal/article/view/125777 .
9.	Pau Pérez-Sales and Hans D. Petersen, <i>Forensic Assessment of Psychological Torture</i> , in ENCYCLOPEDIA OF FORENSIC SCIENCES 493 (Max M. Houck ed., 2023), https://www.pauperez.cat/wp-content/uploads/2023/07/Encyclopedia-of-Forensic-Sciences-Documentation-of-Psychological-Torture.pdf .

10	Pau Pérez-Sales, et al., <i>Protocol on Medico-Legal Documentation of Threats</i> , 33(1) TORTURE J. 54 (2023), https://tidsskrift.dk/torture-journal/article/view/134689/181162 .
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B. Other Academic Publications

No.	Description
11.	F.E. Somnier & I.K. Genefke, <i>Psychotherapy for Victims of Torture</i> , 149(3) BRITISH J. PSYCHIATRY 323 (1986).
12.	Michael Bauer, Stefan Priebe, Bettina Blaring, & Kerstin Adamczak, <i>Long-term Mental Sequelae of Political Imprisonment in East Germany</i> , 181(4) J. NERVOUS & MENTAL DISEASE 257 (1993).
13.	Shakeh Momartin, D. Silove, Vijaya Manicavasagar, & Zachary Steel, <i>Dimensions of Trauma Associated with Posttraumatic Stress Disorder (PTSD) Cases, Severity and Functional Impairment: A Study of Bosnian Refugees Resettled in Australia</i> 57(5) SOC. SCI. & MED. 775 (2003).
14.	Joshua B. Hooberman et al., <i>Classifying the Torture Experiences of Refugees Living in the United States</i> , 22(1) J. INTERPERSONAL VIOLENCE 108 (2007), https://www.researchgate.net/publication/6648807_Classifying_the_Torture_Experiences_of_Refugees_Living_in_the_United_States .
15.	J. Quiroga and J. Jaranson, <i>Torture</i> , in ENCYCLOPEDIA OF PSYCHOLOGICAL TRAUMA 1 (Gilbert Reyes et al. eds., 2008).
16.	Metin Başoğlu, <i>A Multivariate Contextual Analysis of Torture and Cruel, Inhuman, and Degrading Treatments: Implications for an Evidence-based Definition of Torture</i> , 79(2) AM. J. ORTHOPSYCHIATRY 135 (2009), https://www.researchgate.net/publication/45189618_Nature_of_torture_PTSD_and_somatic_symptoms_among_political_ex-prisoners .
17.	Raija-Leena Punamäki, Samir Qouta, & Eyad El Sarraj, <i>Nature of Torture, PTSD, and Somatic Symptoms Among Political Ex-prisoners</i> , 23(4) J. TRAUMATIC STRESS 532 (2010).
18.	Diarmuid Cunniffe, <i>The worst Scars are in the Mind: Deconstructing Psychological Torture</i> 7(1) ICL JOURNAL 1 (2011), https://repository.gchumanrights.org/server/api/core/bitstreams/36c2f0aa-8b7c-4f7c-9cf9-d3f21daba744/content .
19.	Hyunjung Choi, Hoon-Jin Lee, & Hwa-Young Lee, <i>The Effects of Torture-related Stressors on Long-term Complex Post-traumatic Symptoms in South Korean Torture Survivors</i> , 52 INT'L J. PSYCH. 57 (2017), https://onlinelibrary.wiley.com/doi/10.1002/ijop.12276 .
20.	Pan Feng et al., <i>Sleep Deprivation Affects Fear Memory Consolidation: Bi-stable Amygdala Connectivity with Insula and Ventromedial Prefrontal Cortex</i> , 13(2) SOC. COGNITIVE & AFFECTIVE NEUROSCIENCE 145 (2018), https://doi.org/10.1093/scan/nsx148 .
21.	Ergün Cakal, <i>Perception, Practice and Proximity. Qualifying Threats as Psychological Torture in International Law</i> , 31(1) TORTURE J. 19 (2021), https://tidsskrift.dk/torture-journal/article/view/118633/172523 .
22.	Coleen Kivlahan et al., <i>Long-term Physical and Psychological Symptoms in Syrian men Subjected to Detention, Conflict-related Sexual Violence and Torture: Cohort Study of Self-</i>

	<i>Reported Symptom Evolution</i> , 67 LANCET 1 (2023), https://www.thelancet.com/action/showPdf?pii=S2589-5370%2823%2900550-3 .
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C. United Nations Human Rights Council Reports

No.	Description
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27.	Physicians for Human Rights, <i>Experiments in Torture: Evidence of Human Subject Research and Experimentation in the 'Enhanced' Interrogation Program</i> (June 2010), https://www.opensocietyfoundations.org/publications/experiments-torture-evidence-human-subject-research-and-experimentation-enhanced
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F. *Mzaik v. Syrian Arab Republic* Complaint

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