

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	x	
	:	
IN RE:	:	
	:	
GUANTÁNAMO BAY	:	Misc. No. 08-442 (TFH)
DETAINEE LITIGATION	:	
	:	
_____	x	
	:	
ABDUR RAZAKAH, <i>et al.</i> ,	:	
	:	
Petitioners,	:	
	:	
v.	:	Civil Action No. 05-2370 (RMU)
	:	
GEORGE W. BUSH, <i>et al.</i> ,	:	
	:	
Respondents.	:	
	:	
_____	x	

DECLARATION OF J. WELLS DIXON

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

1. I am an attorney at the Center for Constitutional Rights, 666 Broadway, 7th Floor, New York, New York 10012 (“CCR”). Along with Kramer Levin Naftalis & Frankel LLP (“Kramer Levin”), CCR is counsel to Petitioner Ahmad Tourson (“Petitioner”) in the above-captioned habeas case.

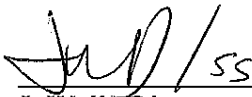
2. I have met with Petitioner at the U.S. Naval Station at Guantánamo Bay, Cuba (“Guantánamo”) on multiple occasions between July 2006 and February 2008. As set forth in my declaration filed in a related Uighur case more than two years ago, during these meetings Petitioner directly authorized me and my co-counsel at Kramer Levin to represent him and obtain his release from Guantánamo. *See* Ex. 1, ¶ 7 (attached hereto).

3. Petitioner also directly authorized our representation in writing. For instance, Petitioner wrote a letter to me in January 2007, more than a year and a half ago, acknowledging and accepting our representation. An English translation of that letter was prepared by a Uighur-language interpreter, and is attached hereto in redacted form. The translation is redacted to omit privileged and confidential attorney-client communications. *See* Ex. 2 (attached hereto).

4. In any case, since my co-counsel and I first met with Petitioner in Guantánamo in July 2006, the government has not challenged our authority to represent him. Nor is there any basis to do so now. Any question whether Petitioner wants to pursue habeas relief after more than six years of indefinite detention was settled long ago.

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

Executed: New York, New York
September 23, 2008



J. Wells Dixon

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	X	
	:	
AMER MOHAMMON, <i>et al.</i> ,	:	
	:	
Petitioners,	:	
	:	
v.	:	No. 05 CV 2386 (RBW) (AK)
	:	
GEORGE W. BUSH, <i>et al.</i> ,	:	
	:	
Respondents.	:	
	:	
_____	X	

DECLARATION OF J. WELLS DIXON

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

1. I am an attorney at the Center for Constitutional Rights, 666 Broadway, 7th Floor, New York, New York 10012 ("CCR"). CCR is co-counsel to all petitioners in the above-captioned case. I am licensed to practice law in the States of New York and Colorado.

2. I am also employed by Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 ("Kramer Levin"), and am currently on a leave of absence from that firm to work at CCR. Kramer Levin represents Petitioners Abdul Rahman a/k/a Abdul Ghaffar (ISN 281) and Adel LNU a/k/a Adel Noori (ISN 584) ("Petitioners") in the above-captioned case. I respectfully submit this declaration in support of Petitioners' renewed motion for access to their counsel and related relief, filed in response to Respondents' July 26, 2006 status report.

3. Kramer Levin also represents, as co-counsel with CCR, the three petitioners in *Mamet v. Bush*, No. 05 CV 1886 (EGS), and the two petitioners in *Razakah v. Bush*, No. 05 CV 2370 (EGS).

4. Like the *Mamet* and *Razakah* petitioners, Petitioners here are citizens of the Xinjiang Autonomous Region, a western province of China also commonly referred to as "Turkistan" or "East Turkistan." They are Uighurs, a Turkic Muslim minority group that has been brutally oppressed by the communist Chinese government.

5. I am informed and believe that there have been a total of twenty-two Uighurs from China detained by Respondents at the U.S. Naval Station at Guantánamo Bay, Cuba ("Guantánamo"). At the time that I appeared in this case on behalf of Petitioners, those two detainees were the only two Uighurs from China not represented by counsel. Indeed, apart from Petitioners here, all of these men have been positively identified by Respondents as detainees at Guantánamo and have been granted access to their counsel.

6. I am further informed and believe that nineteen of the twenty-two Uighur detainees appear on the next-friend authorization of Usama Hasan Abu Kabir (the "Kabir Authorization"). They are each identified on the Kabir Authorization by a single name or alias. They are also identified as "Turkestani," which again means that they are Uighurs from China.

7. I recently traveled to Guantánamo to meet with the *Razakah* petitioners. In particular, I met with *Razakah* petitioner Ahmad Turson (ISN 201) for three days between July 24 and 28, 2006. Mr. Turson appears on the Kabir Authorization, which I reviewed with him. Mr. Turson confirmed that the Kabir Authorization is correct and that he wants counsel to represent him and obtain his release from Guantánamo.

8. We also discussed the other Uighur detainees from China who are identified on the Kabir Authorization, including Petitioners here. Mr. Turson confirmed that: (a) the Uighur detainee identified on the Kabir Authorization as “Abdul Rahman” from “Turkistan[]” is also known as “Abdul Ghaffar”; (b) the Uighur detainee identified on the Kabir Authorization as “Adel” from “Turkistan[]” is “Adel Noori”; and (c) the only other Uighur detainee ever held at Guantánamo named “Adel” is Adel Abdu Al Hakim, who was released to Albania in May 2006.

9. I am further informed and believe that Adel Abdu Al Hakim is also known as “Mohammed” from Turkistan.

10. Adel Abdu Al Hakim and Abu Bakker Qassim were petitioners in *Qassim v. Bush*, No. 05-5477 (D.C. Cir.). They were released with the *Mamet* petitioners to Albania on or about May 5, 2006. I have spoken with the *Mamet* and *Qassim* petitioners by telephone on several occasions since their release to Albania. Like Mr. Turson, they have confirmed that: (a) the Uighur detainee known as “Abdul Rahman” is also known as “Abdul Ghaffar”; and (b) there were only two Uighur detainees at Guantánamo named “Adel” – Adel Abdu Al Hakim and Petitioner Adel Noori.

11. The *Mamet* and *Qassim* petitioners have also confirmed that: (a) Petitioner Abdul Ghaffar was captured with them by privateers in Pakistan, and they were sold to the United States for a bounty of \$5,000 each; and (b) Petitioner Adel Noori was likewise captured in Pakistan.

12. I am also informed and believe that Petitioners are each from an area of Turkistan near the city of Kucha.

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

Executed: New York, New York
September 11, 2006



J. Wells Dixon

EXHIBIT 2

Mr. Wells Dixon,

Redacted

How are you?

This is my

first letter to you since we have been in contact with you and your legal firm. You have been working hard on our behalf in order to prove our innocence. You have been doing all of this without getting paid and utilizing the legal systems in an effort to free us from being detained here. We want to inform you of our gratitude and appreciation for your hard work. We really don't have anything else to give you other than our "Thanks". Please also give our greetings to your other colleagues as well.

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We apologize for asking
so much from you at this time but are deeply thankful for your efforts.

Redacted

Sincerely,
Ahmet Tursun (201)

January 23, 2007.

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