

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GUANTANAMO BAY
DETAINEE LITIGATION

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: Misc. No. 08-442 (TFH)
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ABDUR RAZAKAH, *et al.*,

Petitioners,

v.

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:
: Civil Action No. 05-2370 (RMU)
:
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:
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GEORGE W. BUSH, *et al.*,

Respondents.

DECLARATION OF SEEMA SAIFEE

I, Seema Saiffee, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney at Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 (“Kramer Levin”). Along with the Center for Constitutional Rights, Kramer Levin is counsel to Petitioner Abdur Razakah (“Petitioner”) in the above-captioned petition for a writ of *habeas corpus*.

2. Petitioner has never met with me or my colleagues. On each occasion we have requested to meet with Petitioner, he has refused to meet with us.

3. On September 5, 2008, my co-counsel Wells Dixon, my colleague Darren LaVerne and I spoke with Petitioner by telephone. During this conversation, Petitioner unequivocally provided us with authorization to continue to serve as his attorneys.

4. During this conversation, Petitioner explained why he has refused to meet with us in the past, and why he may not meet with us in the future. Petitioner declared that, despite his innocence, the U.S. government has unlawfully imprisoned him for the past seven years. During those seven years, Petitioner has been told repeatedly by the U.S. military that he is innocent, was mistakenly picked up, and would soon be released. As a result of these broken promises and repeated lies promising imminent freedom, Petitioner lost trust in all Americans, be they members of the U.S. government or members of the legal bar, and decided not to meet with his lawyers.

5. Petitioner explained that at the outset of his imprisonment, he and his fellow Uighurs trusted the U.S. government as the paragon of justice and human rights. Therefore, Petitioner and his fellow Uighurs provided the U.S. government with all their personal information. The U.S. government – after having promised that this information would be kept confidential – breached this confidence and turned over Petitioner’s personal and family information to the Chinese government.

6. Petitioner further explained that he feared retaliation and abuse by the U.S. military if he decided to meet with us in the future, and emphasized that any refusal by him to meet with us in the future should not be taken personally.

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


Seema Saif