

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

IN RE:  
GUANTANAMO BAY DETAINEE LITIGATION

Misc. No. 08-MC-442 (TFH)

Civil Action No. 05-CV-1509 (RMU)  
Civil Action No. 05-CV-1602 (RMU)  
Civil Action No. 05-CV-1704 (RMU)  
Civil Action No. 05-CV-2370 (RMU)  
Civil Action No. 05-CV-2398 (RMU)  
Civil Action No. 08-CV-1310 (RMU)

**PETITIONERS' PROFFER REGARDING AVAILABLE SERVICES AND SUPPORT  
FOR RESETTLEMENT IN THE UNITED STATES**

As summarized in court, Petitioners proffered the evidence below in support of their motion for release. Each of the witnesses identified below was present for cross-examination on October 7, 2008. The government declined to cross examine and offered no evidentiary objection to the admission of the evidence summarized below by proffer.

In addition, the parties and the Court discussed the subject of conditions of release. The Court reserved the right and power to impose such conditions as it deems reasonable when the government produces the Petitioners in court on Friday, October 10, 2008. Further, the Court scheduled a hearing for Thursday, October 16, 2008 at which time terms and conditions of release may further be considered.

The Petitioners have advised the government of their willingness to discuss reasonable conditions in advance of the hearings.

On the issue of arrangements for resettlement the Petitioners proffered the evidence below:

1) Susan K. Krehbiel:

Susan K. Krehbiel, who was present in Court, if called to the stand, would testify substantially as follows:

Ms. Krehbiel is Vice President for Protection at Lutheran Immigration and Refugee Services (LIRS), located in Baltimore, Maryland. She lives in Catonsville, Maryland. LIRS is

under contract with the U.S. State Department's Office of Refugee Settlement, and has been providing services to refugees and immigrants coming to America since 1939, having resettled hundreds of thousands of refugees, of all races and religions, from all parts of the world. LIRS works through a network of 26 affiliates and 20 sub-offices throughout the country to welcome strangers to a new life in America. Thus far in 2008, LIRS has helped resettle more than 9,000 refugees.

Ms. Krehbiel works closely with contacts at the Department of State, and has made them aware of LIRS's efforts to resettle the Uighur men.

Petitioners' **Exhibit 1** is a true copy of the LIRS' Refugee Sponsorship Manual, and it presents details on multiple aspects of resettlement.

LIRS has organized a network of churches, mosques, synagogues, and other entities in the D.C. area to provide appropriate housing and support for all 17 of the Uighur men. Working closely with the Uighur community described below, LIRS is prepared to effect a long-term resettlement solution for the Uighur men through the use of scattered-site housing.

2) Kent Spriggs:

Kent Spriggs, who was present in Court, if called to the stand, would testify substantially as follows:

Mr. Spriggs is an attorney residing in Tallahassee, Florida, and has represented several Guantanamo Yemeni detainees who have been released to their home country.

Mr. Spriggs is a member of, and has worked with a steering committee in the faith-based communities of the Tallahassee area that has long and deep experience in the resettlement of refugees, having resettled refugees from Vietnam, the Mariel Boat Lift, and Hurricane Katrina. The steering committee has received the commitment of the 19 ministers, rabbis and imams who identified on Petitioners' **Exhibit 2**.

The steering committee has committed to support three Uighur refugees in a long-term resettlement plan, set forth in Petitioners' **Exhibit 3**.

3) Rebiya Kadeer

Rebiya Kadeer, who was present in Court, if called to the stand, would testify substantially as follows:

Mrs. Kadeer, who resides in the Washington D.C. area, is the President of the World Uighur Congress and the Uighur-American Association. Mrs. Kadeer is China's most well-known Uighur dissident. She was at one time one of the most successful businesswomen in China, but after she began to speak out about the Uighur conditions, she was put in prison for five years. After human rights organizations around the world demanded her release from prison, and following the personal intercession of Secretary of State Condoleeza Rice, she and her husband were given asylum in the United States. In 2006, while still in prison, she was awarded the Norwegian Rafto Prize, which is often seen as a precursor to the Nobel Peace Prize.

Mrs. Kadeer provides leadership to approximately 300 Uighur-American individuals living and working in the Washington D.C. area. A number of them were present in Court. Mrs. Kadeer had obtained the agreement of 17 Uighur families in Washington D.C. to provide temporary housing and support for the Petitioners, as a bridge to the more permanent arrangements to be offered by LIRS and the Tallahassee Community. A copy of her letter identifying the families is attached as Petitioners' **Exhibit 4**.

Representatives of these families have committed to be present in Court on Friday, October 10, when the men are produced by the Government.

Mrs. Kadeer would also testify that the Uighur-American community would provide more permanent support with acculturation of the men, language issues, adjustment to the community, transportation, and helping the American host organizations better understand the Uighur culture.

4) Sara Beinert:

Sara Beinert, who was present in Court, if called to the stand, would testify substantially as follows:

Ms. Beinert is the large donor coordinator for the Center for Constitutional Rights (CCR) in New York City. CCR is a non-profit legal and educational organization. CCR filed the first *habeas corpus* petition, *Rasul v. Bush*, just one month after the first detainees were brought to Guantanamo. That case resulted in a landmark ruling that detainees have access to U.S. courts to

challenge their detention and treatment in U.S. custody. CCR coordinates the pending Guantanamo detainee cases, and is co-counsel in the consolidated Uighur cases now before this Court.

Ms. Beinert would testify that a substantial donor located by CCR has committed to providing significant funds through an appropriate 501(c)(3) account, for support of the resettled Uighur refugees. The donor is a person of substantial means, and has committed to provide a substantial amount of financial assistance toward resettlement of the men. Ms. Beinert would provide further details to the Court and the government on request.

Dated: October 1, 2008

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