

UNCLASSIFIED//FOR PUBLIC RELEASE  
MILITARY COMMISSIONS TRIAL JUDICIARY  
GUANTANAMO BAY

UNITED STATES OF  
AMERICA

v.

KHALID SHAYKH MOHAMMAD,  
WALID MUHAMMAD SALIH  
MUBARAK BIN 'ATTASH,  
RAMZI BIN AL SHIBH,  
ALI ABDUL AZIZ ALI,  
MUSTAFA AHMED ADAM  
AL HAWSAWI

AE 332(MAH)

**Defense Emergency Motion  
for Appropriate Medical  
Intervention and Return of  
Legal Files**

Filed: 15 December 2014

1. **Timeliness:** This motion is timely filed pursuant to the Trial Judiciary Rules of Court, Rule 3.7(b).
2. **Relief Sought:** The Defense moves this Commission for an Emergency Order compelling: the immediate return of Mr. al Hawsawi's medical devices and medications; immediate and appropriate medical testing to determine the exact source of blood in Mr. al Hawsawi's urine;<sup>1</sup> release of all medical records to date to counsel and to Mr. al Hawsawi's treating physician(s); a meeting with Mr. al Hawsawi's physician(s); and an order to medical personnel to provide whatever immediate medical procedures are necessary under established standards of care in order to remedy Mr. al Hawsawi's severe and chronic (long-standing) medical conditions. Mr. al Hawsawi also seeks an order from the Commission directing JTF-GTMO to return Mr. al Hawsawi's legal bins and to immediately cease further interference with his access to legal materials.

<sup>1</sup> It is possible that the cause of the bleeding is cancer. Though JTF medical personnel are aware of this possibility, no further testing has been conducted and no efforts at ruling out cancer have been made. Since time is of the essence in properly diagnosing and treating cancer, immediate additional testing is necessary. See att. C Lab results for 23 Jul 14, 28 Jul 14 and 5 Aug 14 noting the presence of blood in Mr. al Hawsawi's urine.

3. **Overview:** [REDACTED] Mr. al Hawsawi was subjected to a rough take down [REDACTED] [REDACTED] This event has exacerbated chronic medical conditions from which Mr. al Hawsawi suffers. Mr. al Hawsawi weighs a mere 117 lbs. and is 5' 4 1/2" inches tall. At the time of the take down, Mr. al Hawsawi was [REDACTED] suffering from debilitating side effects from medication he has recently been receiving for Hepatitis C. The side effects from this medication include weakness, fatigue, dizziness, and nausea.<sup>2</sup> This recent event, combined with a history of deficient medical care for Mr. al Hawsawi's acute and chronic medical conditions, warrants urgent judicial intervention. The Camp Commander's orders to strip Mr. al Hawsawi of prescribed medical devices and medicine and deny him access to legal material, violate domestic and international law and the standing communications order in this case, AE 018U, warranting urgent judicial intervention.

Without an immediate order for appropriate medical intervention<sup>3</sup>, Mr. al Hawsawi will continue in his severe and significant medical deterioration that is rapidly becoming life-threatening. In addition, withholding legal material from him violates his statutory and Fifth and Sixth Amendment rights to due process, to prepare and present a defense and to receive the effective assistance of counsel.

4. **Burden and Standard of Proof:** The burden of persuasion on this motion rests with the Defense. R.M.C. 905(c).

<sup>2</sup>Mr. al Hawsawi had reported all of these side effects [REDACTED] of appetite, to counsel PRIOR to the rough take down by JTF-GTMO Guard Force Personnel [REDACTED]

<sup>3</sup> On 21 May 2014, Mr. al Hawsawi moved to have his case severed from that of the other four accused in order that the commission could address longstanding motions affecting Mr. al Hawsawi's case. See AE 299. In in AE 302B(MAH), 322A(MAH) and 322D(MAH) Mr. al Hawsawi has continued to affirm that request.

**5. Facts:**

a. Mr. al Hawsawi suffers from chronic and severe medical conditions including hemorrhoids, anal fissures, rectal prolapse, Hepatitis C, cervical degenerative disk disease, migraines and lower back pain. *See* att. B, Medical Summary of May 2014. The recently released Senate Select Committee on Intelligence Study of the Central Intelligence Agency's Detention and Interrogation Program reveals the CIA's awareness of reports of "excessive force" in rectal exams as well as the determination that such exams were an effective means of behavioral control. Mr. al Hawsawi was later diagnosed with chronic hemorrhoids, anal fissures, and symptomatic rectal prolapse."<sup>4</sup> This condition has never been remedied.

b. In July of 2014 Mr. al Hawsawi experienced an acute onset of a still undiagnosed condition or conditions causing him significant pain accompanied by blood in his urine. Diagnostic laboratory tests confirmed the abnormal presence of blood and bacteria in his urine and low red cell, white blood cell and platelet counts beginning 23 July 2014. *See* att. C, Lab Results from 23 July 2014 – 29 Nov 2014. These same abnormalities, with the exception of the low platelet count, were identified through urine and blood tests obtained 28 July 2014 and 05 Aug 14.

c. The results of Mr. al Hawsawi's cystoscopy specimen testing indicate "Atypical. Scant specimen (meaning poor quality and insufficient) consists of few multicellular groups/fragments or urothelial cells. Comment: Differential diagnosis included infectious process, stones, instrumentations and low grade bladder tumors. Clinical correlation is recommended." *See* att.

<sup>4</sup> *See* Footnote 584, SSCI Torture Report Executive Summary, Findings & Conclusions (released 9 Dec 2014). Senate Select Committee on Intelligence, Committee Study of the Central Intelligence Agency's Detention and Interrogation Program: Foreword by Senate Select Committee on Intelligence Chairman Dianne Feinstein; Findings and Conclusions; Executive Summary (approved 13 Dec 2012) (updated for release 3 Apr 2014) (declassification revisions 3 Dec 2014) available at <http://www.intelligence.senate.gov/study2014/sscistudy1.pdf> (accessed 9 Dec 2014).

D, Urine Cytology Report 26 Aug 14. The results of this test did not rule out the possibility of cancer as the source.

d. On 30 July 2014 CT Scans were conducted which identified, among other findings, multiple hyper densities in the kidney, kidney stones, cirrhotic change in his liver, and multiple focal calcifications in and surrounding the midline urethra. *See* att. E, Results from CT Scans done on 30 July 2014.

e. Mr. al Hawsawi has confirmed that no further urine tests have been conducted although the cause of his pain and the blood and abnormal discoloration of his urine remain unidentified and undiagnosed.<sup>5</sup> It appears the JTF-GTMO solution to continually abnormal laboratory tests results is simple, stop testing Mr. al Hawsawi. As the possibility of cancer has not been ruled out, the willful disregard for Mr. al Hawsawi's medical needs and the decision to ignore his symptoms is unacceptable.

f. While urinary testing ceased, blood tests continued. While continued blood tests are appropriate for Mr. al Hawsawi, they are not a substitute for urine tests. These blood tests continue to show abnormally low red and white blood cell counts which can be indicative of an on-going infectious process, a weakened immune system, nutritional deficiencies and disease. The cause(s) of these abnormal values is also still unknown. *See* att. C Lab results noting low red and white blood cells on 23 Jul 14, 28 Jul 14, 5 Aug 14, 2 Oct 14, 10 Oct 14, 24 Oct 14 and 29 Nov 14.

g. Of additional great concern is that during this same period Mr. al Hawsawi finally began receiving active treatment for his chronic Hepatitis C in the form of a combined

<sup>5</sup> While Defense counsel has asked for updated medical records, the Prosecution has not provided them completely or in timely manner. Counsel only yesterday were provided select medical reports dating from June 2014 through 11 Aug 2014. These reports had only 1 lab result, the one from 5 Aug 14. All the attached documents (with the exception of the medical summary) were received directly from Mr. al Hawsawi. Mr. al Hawsawi confirmed no further urine samples were requested.

medication regimen. As with any new regimen, the recipients' overall physical well-being is an important factor in the regimen's effectiveness.

h. Mr. al Hawsawi may finally be able to undergo a much needed medical surgery.

However, it is unclear whether Mr. al Hawsawi's current physicians even have access to medical records from 2003-2006, during which time Mr. al Hawsawi's suffered the initial injury at the CIA's torture facilities.<sup>6</sup> Numerous letters by counsel requesting to speak to Mr. al Hawsawi's physician(s) have gone unanswered. Mr. al Hawsawi's counsel have also repeatedly requested discovery of all medical records, including these records, but they have not been provided to date.

i. [REDACTED] Mr. al Hawsawi was subjected to a rough take down [REDACTED]

[REDACTED] This recent event has exacerbated medical conditions from which Mr. al Hawsawi suffers. Mr. al Hawsawi's counsel has asked that the circumstances surrounding this incident be investigated. On December 13, Mr. Robert Swann informed counsel that the incident "has already been investigated."

j. Due in large part to the effects from this take down, Mr. al Hawsawi cancelled the morning attorney meeting on December 8<sup>th</sup>, terminated early the attorney meeting on the 10<sup>th</sup> of December and cancelled entirely the meetings on the 11<sup>th</sup>.

k. Mr. al Hawsawi, weighs 117 lbs. and stands 5' 4 1/2" inches. Mr. al Hawsawi was [REDACTED] and was under the influence of debilitating side effects from medication he is receiving for chronic Hepatitis C. These side effects include weakness, fatigue, dizziness, and nausea.

<sup>6</sup> See p. 154 Unclassified Summary of the Senate Select Committee on Intelligence Report noting, "After failing to gain assistance from the Department of Defense, the CIA was forced to seek assistance from three third-party countries in providing medical care to al-Hawsawi and four other CIA detainees with acute ailments."

1. After this take down, Mr. al Hawsawi was stripped of prescribed medical devices and medication and denied access to legal material contained in his legal bins.

6. **Law and Argument:**

**A. The Geneva Convention Relative to the Treatment of Prisoners of War requires the United States provide necessary medical care.**

The Treatment of Prisoners of War requires Mr. al Hawsawi's be provided necessary medical care by physicians qualified to diagnosis and treat him or to transfer him to a medical facility that can adequately address his medical issues. Article 30 of the Geneva Convention Relative to the Treatment of Prisoners of War (Geneva Convention III) provides, in part:

Prisoners of war suffering from serious disease, or whose condition necessitates special treatment, a surgical operation or hospital care, must be admitted to any military or civilian medical unit where such treatment can be given... Special facilities shall be afforded for the care to be given to the disabled, in particular to the blind, and for their rehabilitation, pending repatriation. Prisoners of war shall have the attention, preferably of medical personnel on of the Power on which they depend and, if possible, or their own nationality....

**Article 30, Geneva Convention Relative to the Treatment of Prisoners of War, Aug. 12, 1949, 6 U.S.T. 3316, 75 U.N.T.S. 135.**

Article 13 provides, in part:

Prisoners of War must at all times be humanely treated and provided the medical attention required by their state of health. Any unlawful act or omission by the Detaining Power causing death or seriously endangering the health of a prisoner of war in custody is prohibited, and will be regarded as a serious breach of the present Convention. In particular, no prisoner of war may be subjected to physical

mutilation or to medical or scientific experiments of any kind which are not justified by the medical, dental or hospital treatment of the prisoner concerned and carried out in his interest.

**Article 13, Geneva Convention Relative to the Treatment of Prisoners of War, Aug. 12, 1949, 6 U.S.T. 3316, 75 U.N.T.S. 135.**

And Article 15 provides, in part:

The power detaining prisoners of war shall be bound to provide free of charge for their maintenance and for the medical attention required by their state of health.

**Article 15, Geneva Convention Relative to the Treatment of Prisoners of War, Aug. 12, 1949, 6 U.S.T. 3316, 75 U.N.T.S. 135.**

While the United States has consistently declined to recognize detainees such as Mr. al Hawsawi as prisoners of war, our government has nevertheless advanced the position that detainees are held and treated in accordance with the medical provisions of the Convention.<sup>7</sup> On September 28, 2012, BG Mark Martins remarked in a speech before the Royal Institute of International Affairs, Chatham House, London, "...it should not be overlooked that all three branches of government in the United States now regard military commissions as being bound to comply with the requirement of Common Article 3 of the Geneva Conventions of 1949."

This is the time for the government to make good on that promise. Depriving Mr. al Hawsawi of approved necessary medical devices and prescribed medication, violates the Geneva Convention. Immediate and appropriate medical testing to determine the exact source of blood in Mr. al Hawsawi's urine and to rule out life threatening conditions such as cancer is mandated by Mr. al Hawsawi's documented state of health. Willful disregard for Mr. al Hawsawi's medical needs and denial of necessary testing similarly runs afoul of our obligation to treat all

<sup>7</sup> DoD Directive 2310.01E "DoD Detainee Program," August 19, 2014

detainees humanely and to provide the requisite level of medical care mandated by their state of health. The Military Judge should order that this practice be immediately ceased and that Mr. al Hawsawi receives the necessary treatment by a qualified physician to determine the unknown medical condition(s) causing the presence of blood, protein and bacteria in his urine that are indicative of a serious medical crisis.

**B. The Geneva Convention Relative to the Treatment of Prisoners of War requires the United States provide Mr. al Hawsawi reports of his past medical treatment in CIA custody in order to make informed decisions about his current medical condition.**

The Geneva Convention Relative to the Treatment of Prisoners of War also requires that Mr. al Hawsawi be provided medical reports of his past medical treatment.

Article 30 goes on to provide, in part:

Prisoners of war may not be prevented from presenting themselves to the medical authorities for examination. *The detaining authorities, shall upon request, issue to every prisoner who has undergone treatment, an official certificate indicating the nature of his illness or injury, and the duration and kind of treatment received....*

**Article 30, Geneva Convention Relative to the Treatment of Prisoners of War, Aug. 12, 1949, 6 U.S.T. 3316, 75 U.N.T.S. 135**

Mr. al Hawsawi has requested access to all his medical records including but not exclusive to those from 2003-2006. To date, all of his records have not been provided. Mr. al Hawsawi has previously executed an authorization form requesting that all medical records be provided to his counsel.<sup>8</sup> These records are necessary so that Mr. al Hawsawi may make a fully informed decision regarding any potential medical procedures and so that his counsel can appropriately and in a timely manner specifically challenge deficient aspects of his care. These

<sup>8</sup> A signed medical authorization for Defense counsel to receive Mr. Hawsawi's medical treatment records will be provided if the Military Judge determines this is necessary.



records should be immediately provided to Mr. al Hawsawi through his defense team with the “releasable to ISN 10011” markings applied, so that we may share and discuss the documents with Mr. al Hawsawi. Since a complete medical history is essential to Mr. al Hawsawi making an informed decision regarding any surgery, it is also requested that the defense be provided with all of Mr. al Hawsawi’s medical records over the last 12 months with the “releasable to ISN 10011” markings applied. The Commission should also order that counsel be afforded the opportunity to meet with the treating physician(s) to ascertain the information available to the medical provider, his or her qualifications, and his or her recommended treatment plan. It is important to understand that legal counsel stand in the position of closest trusting relationship available to Mr. al Hawsawi at this time. Given Mr. al Hawsawi’s brutal history of detention and maltreatment, which included the direct involvement of medical personnel, it is understandable that he would seek to consult with those he trusts most in this setting.

Defense counsel have recently attempted to meet with one of Mr. al Hawsawi’s medical providers but this request was denied by the JDG Commander. *See* att. F Aug 18, 2014 Denial to Meet with Medical Provider and communication of such denial by the JTF-GTMO Litigation Support Staff. Counsel have also made repeated attempts to communicate with Mr. al Hawsawi’s medical providers through correspondence, but those letters have gone unanswered. Finally, the prosecution has indicated that until counsel sign the MOU additional records will not be provided. With regards to Mr. al Hawsawi’s medical records, the recent exposure of the CIA brutal methods and the medical consequences of those methods should alleviate the prosecution’s need to continue to withhold relevant medical information necessary for timely and effective medical intervention. This Commission must act now in order to safeguard the health of Mr. al Hawsawi and ensure that he receives timely and appropriate medical treatment.

Failure to act will allow Mr. al Hawsawi's health to continue to deteriorate without timely and appropriate intervention and will increase the likelihood of a more severe condition which could result in death.

**C. Denying Mr. al Hawsawi access to his legal material violates AE 018U and his statutory and Fifth and Sixth Amendment rights to due process, to prepare and present a defense, to confront his accusers, and to receive the effective assistance of counsel.**

Mr. al Hawsawi's legal materials have been segregated and his access to the vast majority of legal materials has been denied. This violates the written communications order in this case, AE 018U, and warrants urgent judicial action. Withholding legal material from Mr. al Hawsawi violates his statutory and Fifth and Sixth Amendment rights to due process, to prepare and present a defense and to receive the effective assistance of counsel.

AE 018U permits searches of the legal bins for contraband, but does not authorize the removal of attorney-client and other-case-related material as an administrative punishment.<sup>9</sup> Mr. al Hawsawi and his Defense counsel must continually communicate regarding legal decisions. This ongoing communication necessitates Mr. al Hawsawi's access to his legal materials. Withholding Mr. al Hawsawi's access to his legal bins interferes with the attorney client relationship and his statutory and Fifth and Sixth Amendment rights to due process, to prepare and present a defense and to receive the effective assistance of counsel.

7. **Conclusion:** The Defense requests that this Commission issue an oral ruling followed by a conforming order that compels the immediate return of Mr. al Hawsawi's medical devices and medications and orders Mr. al Hawsawi's treating physician(s) to provide the necessary, proper and timely medical tests and procedures consistent with generally accepted standards of care in order to remedy severe and chronic long-standing medical conditions. The Commission should

<sup>9</sup> AE 018U, para. 11.

order that Mr. al Hawsawi's physician(s) take immediate and appropriate medical action in order to determine the exact source of blood in Mr. al Hawsawi's urine as well as make available long delayed necessary surgical procedures. The Commission must order the release to defense counsel and Mr. al Hawsawi's treating physicians of all medical records to date including medical records for the period of 2003-2006. Similarly the commission must order that Mr. al Hawsawi's treating physician(s) including specialist meet with Mr. al Hawsawi's counsel in order to assist Mr. al Hawsawi to make informed medical decisions. Finally, Mr. al Hawsawi also seeks an order from the Commission directing JTF-GTMO to return Mr. al Hawsawi's legal bins and to immediately cease interference with his access to all legal materials.

8. **Request for Oral Argument:** Defense requests the Commission address this issue in court on 16 December 2014 and requests oral argument.

9. **Request for Witnesses:** Mr. al Hawsawi requests production of the following witnesses: Staff Judge Advocate JTF GTMO, JTF Senior Medical Officer, Mr. al Haswsawi's treating physician(s) including any specialists, Camp Commander High Value Detainee Facility, Assistant Watch Commander High Value Detainee Facility.

10. **Conference with Opposing Counsel:** Prosecution responds as follows:

- objects to addressing this as an emergency motion outside normal course of business.
- believes that the requested relief with regards to return of medical devices is Moot.
- believes that the request for additional immediate and appropriate medical testing for blood in Mr. al Hawsawi's urine is not ripe.
- objects to release of classified medical records without a signed MOU from the defense. But will continue to provide unclassified records of treatment.
- believes the request to meet with Mr. al Hawsawi's physicians is not ripe for adjudication.
- believes that the request to provide whatever immediate medical procedures are necessary under established standards of care in order to remedy Mr. al Hawsawi's medical conditions, is not ripe for adjudication.
- believes that Claim for return of legal bins is moot.

11. **Attachments:**

- A. Certificate of Service;
- B. Medical Summary of May 2014\*;
- C. Lab Results from 23 July 2014 – 29 Nov 2014\*;
- D. Urine Cytology report 26 Aug 2014\*;
- E. Results from CT Scans done on 30 July 2014\*;
- F. Aug 18, 2014 Denial to Meet with Medical Provider communicated by the JTF-GTMO Litigation Support Staff.

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\* These attachments are being filed under seal as medical records are specifically marked "Not Releasable to Public".

\_\_\_\_\_  
//s//

SEAN M. GLEASON  
LtCol, USMC  
Detailed Defense Counsel for  
Mr. al Hawsawi

\_\_\_\_\_  
//s//

WALTER B. RUIZ  
Learned Defense Counsel for  
Mr. al Hawsawi

\_\_\_\_\_  
//s//

JENNIFER N. WILLIAMS  
LTC, JA, USAR  
Detailed Defense Counsel for  
Mr. al Hawsawi

**A**

**CERTIFICATE OF SERVICE**

I certify that on 15 December 2014, I caused to be hand delivered and electronically filed **AE 332(MAH), Defense Emergency Motion for Appropriate Medical Intervention and Return of Legal Files**, with the Clerk of the Court and caused a copy to be served on all counsel of record by e-mail.

    //s//    

WALTER B. RUIZ

Learned Counsel for Mr. Hawsawi

**Attachment B**

**UNDER SEAL**

Filed with TJ  
15 December 2014

Pages 17-19 located in original record of trial.  
POC: Chief, Office of Court Administration  
Office of Military Commissions

Appellate Exhibit 332 (MAH)  
Page 16 of 53



**Attachment C**

**UNDER SEAL**

Filed with TJ  
15 December 2014

Pages 21-37 located in original record of trial.  
POC: Chief, Office of Court Administration  
Office of Military Commissions

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**Attachment D**

**UNDER SEAL**

Filed with TJ  
15 December 2014

Pages 39-40 located in original record of trial.  
POC: Chief, Office of Court Administration  
Office of Military Commissions

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**Attachment E**

**UNDER SEAL**

Filed with TJ  
15 December 2014

Pages 42-48 located in original record of trial.  
POC: Chief, Office of Court Administration  
Office of Military Commissions

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**F**

RE: ISN 10011 - Enterprise Vault Archived Item

Page 1 of 3

**From** JTFGTMO-SJA-Litigation Support **Date** Monday, August 18, 2014 12:09:05 PM  
**To** Williams, Jennifer N LTC OSD OMC Defense; JTFGTMO-SJA-Litigation Support  
**Cc**  
**Subject** RE: ISN 10011  
[ISN 10011 Request \(18Aug14\).pdf](#) (32 KB HTML) [Appendix A to SOP 11 - 10 March 2014.pdf](#) (179 KB HTML)

ALCON,

RE: ISN 10011 special request.

1. Attached, please find the special request for m indicating action taken by the JDG commander.
2. Attached, please find Appendix A to SOP 11.

V/R  
LSS

-----Original Message-----

**From:** Williams, Jennifer N LTC OSD OMC Defense [mailto:Jennifer.Williams@...]  
**Sent:** Monday, August 18, 2014 10:54 AM  
**To:** JTFGTMO-SJA-Litigation Support  
**Subject:** RE: ISN 10011

LSS- I requested your assistance in meeting with the medical provider. Is my request denied because the medical provider has refused to meet with me, or has the request been denied without consulting the medical provider? If the request has been denied on its face (without consulting the medical provider) please provide me with the reason. If the medical provider has refused to meet with me, please provide confirmation. In addition, can you please provide a copy of any guidance and SOP(s) regarding any restrictions on items that can be provided to detainees, in general, and HVD's, in particular. There have been items refused (food items, foam mattress topper, scarf) and I request any and all guidance and SOP(s) available at your earliest convenience for future submissions. Thank you very much. R/  
LTC Williams

-----Original Message-----

**From:** JTFGTMO-SJA-Litigation Support  
**Sent:** Monday, August 18, 2014 10:38 AM  
**To:** JTFGTMO-SJA-Litigation Support; Williams, Jennifer N LTC OSD OMC Defense  
**Subject:** RE: ISN 10011

ALCON,

RE: ISN 10011 special request.

1. Your special request to meet with ISN 10011's medical specialist is DENIED.

V/R  
LSS

-----Original Message-----

**From:** JTFGTMO-SJA-Litigation Support  
**Sent:** Monday, August 18, 2014 9:22 AM  
**To:** 'Williams, Jennifer N LTC OSD OMC Defense'; JTFGTMO-SJA-Litigation Support  
**Subject:** RE: ISN 10011

12/12/2014

RE: ISN 10011 - Enterprise Vault Archived Item

Page 2 of 3


ALCON,

RE: ISN 10011 special request.

1. JTF-GTMO has received and is processing your request.

V/R  
LSS

-----Original Message-----

From: Williams, Jennifer N LTC OSD OMC Defense  
[mailto:Jennifer.Williams@]  
Sent: Monday, August 18, 2014 9:03 AM  
To: JTFGTMO-SJA-Litigation Support  
Subject: RE: ISN 10011

LSS- Please see attached commissions form. Thank you very much for your assistance. R/ LTC Jennifer Williams, Asst. Detailed Defense Counsel

-----Original Message-----

From: JTFGTMO-SJA-Litigation Support  
Sent: Monday, August 18, 2014 6:31 AM  
To: Williams, Jennifer N LTC OSD OMC Defense; JTFGTMO-SJA-Litigation Support  
Subject: RE: ISN 10011

ALCON,


RE: ISN 10011 special request.

1. Please submit a commissions special request for m.

2. One has been attached.

V/R  
LSS

-----Original Message-----

From: Williams, Jennifer N LTC OSD OMC Defense  
[mailto:Jennifer.Williams@]  
Sent: Sunday, August 17, 2014 4:39 PM  
To: JTFGTMO-SJA-Litigation Support  
Subject: ISN 10011

Litigation Support- I would like to meet briefly with the medical specialist on island that is performing a medical procedure on Mr. Hawsawi. Please forward this request and let the provider know I am on island and available this evening, all day and evening tomorrow and early morning on Tuesday. Please provide a response at your earliest convenience. Thank you very much. R/

Jennifer N. Williams

LTC, JA, USAR

Office of Chief Defense Counsel

for Military Commissions

1620 Defense Pentagon



12/12/2014

RE: ISN 10011 - Enterprise Vault Archived Item

Page 3 of 3

Washington, DC 20301

E-mail: jennifer.william [REDACTED]

Office: [REDACTED]

[REDACTED]

12/12/2014

JTF-GTMO Commissions Attorney Request Form

Date: 18 August 2014

From: LTC Jennifer N. Williams

ISN: 10011

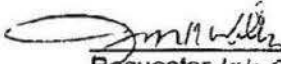

Subject: Request to speak to medical provider

I request the following assistance from Joint Task Force Guantanamo Bay:

I would like assistance to meet briefly with the medical specialist on island that performed a medical procedure on Mr. Hawsawi. Please forward this request and let the provider know I am on island and available all day and evening today and early morning on Tuesday. I can be reached at [REDACTED] Please provide a response at your earliest convenience. Thank you very much.

**Justification:**

Mr. Hawsawi had a medical procedure on 17 Aug 2014. Mr. Hawsawi also has chronic health conditions that require monitoring and treatment. At his request, his learned counsel and detailed counsel have been assisting him in requesting necessary diagnostic treatment and care. Mr. Hawsawi also relies on his counsel, with the assistance of an Interpreter, to review the results of medical tests and procedures to more fully understand them. The physician who performed the medical procedure is in the best position to discuss the results of the medical procedure, which was scheduled based upon serious medical concerns. Prior diagnostic testing did not identify the cause of an acute medical condition. Counsel is very concerned about Mr. Hawsawi's deteriorating health. Speaking with the medical provider who performed the procedure will provide counsel timely results of the procedure and alert them to any findings that require further medical consult and treatment, that may require the assistance of counsel to get addressed adequately and expeditiously. It will also allow counsel to aid Mr. Hawsawi in more fully understanding the results of the procedure. I understand that arrangements made as a result of this request are subject to cancellation or change without notice.

	LTC, JTF-GTMO	18 Aug 2014
Requestor	Asst. Det. Counsel	Date
		18 AUG 2014
JDG Commander		Date

Request:  Approved  
 Denied