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A F F I D A V I T

I the undersigned, Attorney Labib Habib, ID No. -----, after being warned that I must tell the truth and that if I do not do so, I shall be subject to punishment set by statute, hereby declare as follows:

I am an attorney in the office of L. Tsemel. On 2 April 2003, I spoke by telephone with Mr. B. J., to clarify the details of his detention. Mr. J. told me that, because of the closure on the Occupied Territories, he was unable to come to our office in Jerusalem. I made it clear to him that his comments were being recorded for inclusion in an affidavit, with all that that entails, and that this affidavit will be submitted to the court. Mr. J. transmitted the following details:

1. I live in Nablus. I was born in 1954 and work as a clothes salesman. I am married and have five children.

The detention and the places where I was held

2. On 22 November 2002, my cousin and I returned from Amman via the bridge. We reached the bridge at 11:00 A.M. Security forces delayed me at the bridge until 5:00 P.M., when they informed me that I was under detention.

The soldiers blindfolded me, bound my hands, and put my cousin and me into a bus. I did not know where they were taking us. I don't know for sure, but I estimate that we were on the road for around two hours before we stopped, and, apparently, dropped off my cousin, and then continued for another hour or so before we got to a location unknown to me. A physician checked me. I remained there for about three days.

3. Two soldiers in uniform took me, with my hands cuffed and eyes covered, by vehicle to another place, about an hour away, whose location I didn't know (hereafter: **“the secret facility”**).

I was still cuffed and blindfolded when they took me into the facility. This whole time, I was unable to see what was happening around me or where I was. When we got to the

physician, the soldiers removed the blindfold. The physician checked me. I undressed and they gave me clothes to wear.

I stayed in the secret facility for 15 days. On about the 10th day of my stay there, I was taken to Jalameh [Kishon], where they extended my detention. The trip there took an hour.

4. After staying 15 days in **the secret facility**, I was taken to a house of detention in Petach-Tikva, where I was held for three days. They kept me in a cell with another detainee. As far as I recall, the police took a statement from me while I was there.

5. On Wednesday, I was taken to Meggido Prison, where I was kept together with other detainees, whom I later learned were there to “get me to sing.” They told me that a six-month administrative detention order had been issued against me.

On the 11th day, the detainees told me that I was going to be taken to a hearing on my appeal against the administrative detention. It turned out that they were wrong. I was taken back to Jalameh, where I was held in a cell with two other detainees.

6. The next day, I was taken back to **the secret facility**. The trip took about an hour. I stayed in a cell there for two nights. While there, I was given a lie-detector test at the directive of my interrogators.

This time, I stayed 16 days in **the secret facility**. Other than the polygraph, nobody questioned me. On my last day, the interrogator called for me and told me that I was being taken to Jalameh to have my detention extended. They took me to Jalameh, where I stayed one night. My detention was extended, and I was returned to my cell. The next day, they took me to Room 10 in the prison, a room where they put detainees who were being moved, where I stayed for about two hours. Then two soldiers came, tied my hands and blindfolded me, and took me with them.

7. I was taken once again to **the secret facility**. I think it was a Wednesday. I remained there until Sunday. On Monday morning, I asked to speak with the interrogator. He met with me, and I told him that I was no longer able to withstand the torture, and that I had told them everything that I knew. The interrogator informed me that the plan had changed. On Tuesday night, they moved me to a larger cell.

8. On Wednesday, after being held for eight days in **the secret facility**, I was moved to Jalameh, where I was held alone in a cell. I stayed there for a week. During that time, I met with a representative of the Red Cross for the first time.

At the end of the period, I was taken to have my detention at Jalameh extended. It was extended for eight days, the last day being election day in Israel, 28 January 2003. On election day, two soldiers took me to Ofer. I was taken to Ofer Camp, checked by the physician in the camp, and stayed there for three days. On the last day, they extended my detention for another month or so, I think it was. I understood that I was to be released on 22 February 2003.

9. On 20 February 2003, I was released to my home. I had been detained for some three months.
10. Of course, all my calculations regarding the times are to the best of my recollection and are estimates. I had no way to check the time.

Description of the secret facility

11. As stated above, I was moved a number of times to the same secret facility. When I asked the soldiers time and again as to what the site was and where I was being held, they told me, "you are on the moon," and refused to explain where I was.
12. Each time I was taken to the secret facility, my eyes were blindfolded and my hands bound. I never saw how the site looks from the outside or where I was being held. The soldiers covered my eyes with black cloth, so I could not see anything.
13. In that facility, I could remove the blindfold only when I was in the cell. The moment that the soldiers came to my cell, they ordered me to turn around so that I face the wall, and ordered me to put on the black cloth to cover my eyes. Then they took me to the interrogation room or another detention site, as mentioned above.
14. From what I could see, the soldiers were dressed in green army uniforms.
15. I was kept in a cell. The inside of the cell was painted black and it was about 2X2 meters. There was a hole for a Turkish-style toilet (without toilet paper). On the top of the toilet was a box with an opening from which water exited. The cell had no windows. There was one light bulb, which was yellow and was on all the time.

- There was an opening in the ceiling that discharged air continuously and made a great deal of noise. The soldiers operated this air-conditioner from the outside, and it was on most of the time.
16. Each time they brought me to the facility, they took me to the physician. While in the physician's room, they removed my blindfold. This was the only opportunity I had to see the soldiers who took me and the physician who examined me. I should mention that they took me to the physician daily. He checked my heartbeat, temperature, blood pressure. He was dressed in regular civilian dress. He was young, as far as I could tell, and there was one bed in the room.
 17. Throughout my stay there, I was the only one in my cell. I heard sounds of other detainees. We were not allowed to speak with each other. In one instance, detainees started up a conversation. Soldiers came over to me. They thought I was involved, but that wasn't true. They punished me by turning on the air-conditioner in my room.
 18. The first time I was brought to the cell, one of the soldiers called me "Hanukkah" and I did not understand why. All the soldiers called me by that name. I knew that I had a number that they were supposed to use. My number was 957. This number was also marked on my medical file, which I saw in the physician's room.
 19. The interrogation room in which they interrogated me was large. The walls were wood-paneled and were brown. There were no windows. There was no computer. There was a table and two chairs, one for the interrogator and one for the detainee. The interrogators were in civilian dress. They were young and, as far as I knew, were GSS interrogators. I would be taken from the cell to the interrogation room by foot, my eyes covered, a distance of about 20 meters.
 20. The moment that I entered the facility, they gave me blue pants and shirt that I wore. Nothing was written on them. They did not give me a change of clothes or underpants.
 21. Each night, the soldier told me to shower. I would go under the box from which hot water came out. The soldier turned on the water from the outside, and I took my shower. I had one dirty towel to dry myself with.
 22. In the cell, there was a bed with a mattress and blanket, but no sheets. At night, the soldiers who stayed outside made noise almost every night. They used to sing, party, and shout, which prevented me from sleeping.

23. The soldiers brought me food three times a day. They came to the cell, told me to turn around and put on my blindfold, and then put the food in the cell without me seeing them.
24. As a result of all that I have described above, and in light of the mystery surrounding the place, when the soldiers told me that I was on the moon, and I couldn't even see the faces of the soldiers, my jailkeepers – I was extremely frightened. The color of the cell, which was black, apparently by intention, also dulled my senses, and being held in isolation for days on end, sometimes without being interrogated, affected me very badly. My primary distress was psychological, a result of not knowing where I was, of the place itself, which was frightening, and of the feeling that I would disappear and my family would not know what happened to me.
25. They did not beat me or touch me. I am convinced that my age, close to 50, and the fact that my interrogators knew I was innocent, as they ultimately realized when they released me, caused my interrogators to treat me as they did, in the manner I described.

I the undersigned, Attorney Labib Habib, declare that this is my name, this is my signature, and the contents of my affidavit are true.

[signed]

Labib Habib, Attorney

On 9 April 2003, Attorney Labib Habib, whom I know personally, appeared before me, and after I warned him that he must state the truth and that if he does not do so, he is subject to punishment set by statute, he confirmed the accuracy of his affidavit and signed it in my presence.

[signed]

L. Tsemel, Attorney