

coercion used against Petitioner as torture or impermissible coercion.<sup>5</sup>

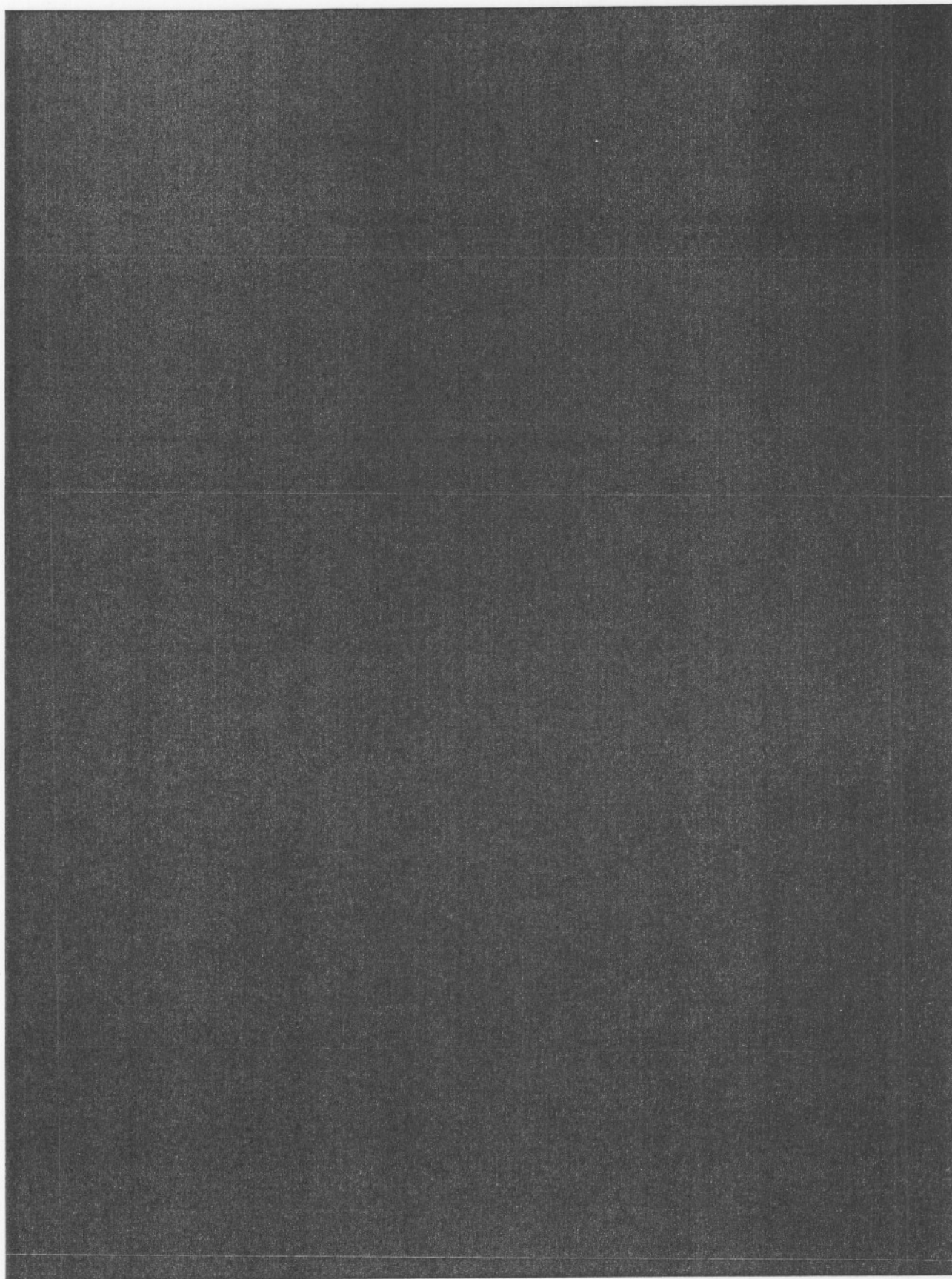
**B. U.S. Personnel Tortured Petitioner and Other Detainees to Obtain Information Related to Petitioner's Status**

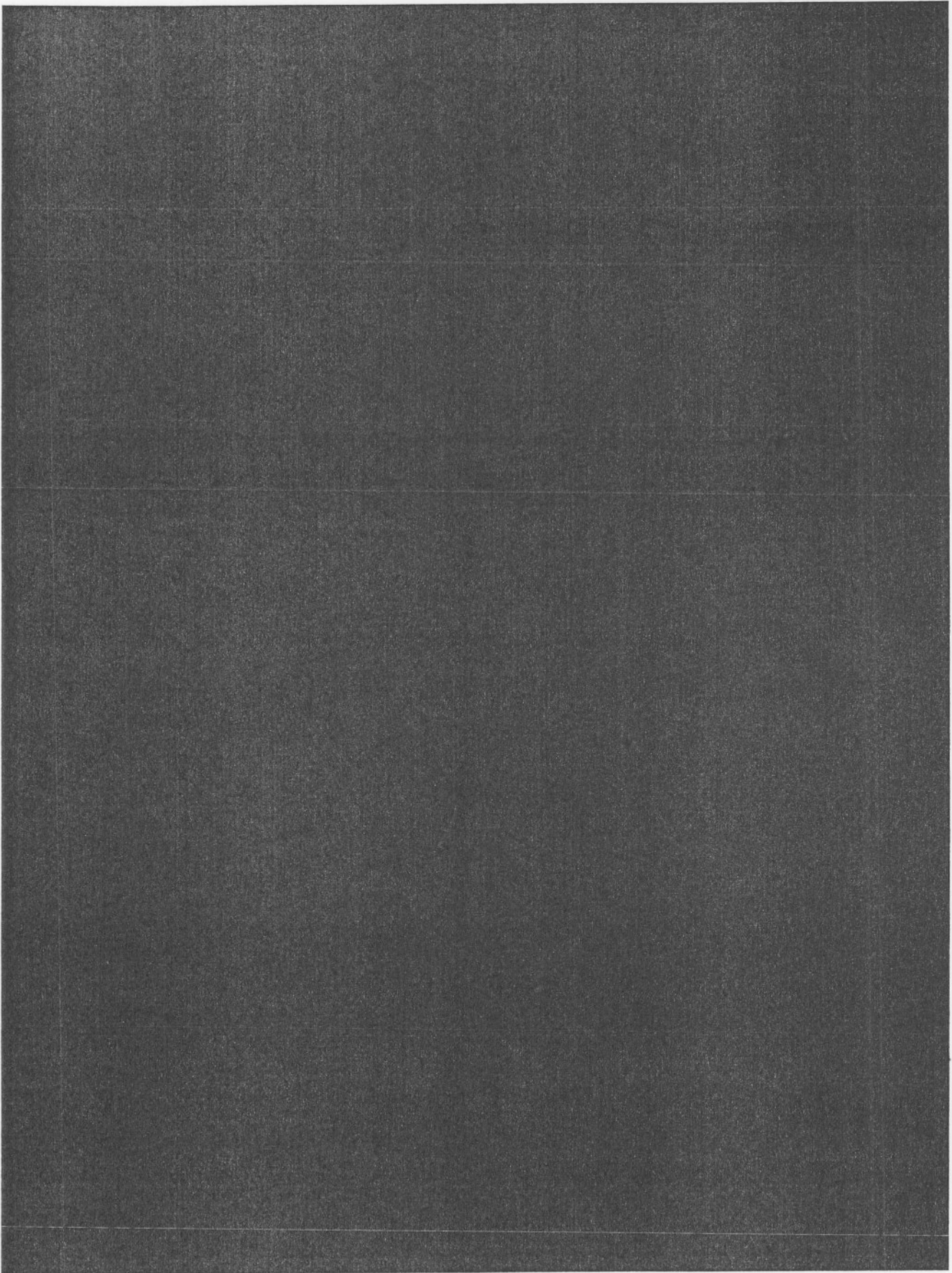
Information related to Petitioner that U.S. interrogators obtained from Petitioner Khan and other detainees [REDACTED] was indisputably extracted through torture, cruel, inhuman and degrading treatment and unlawful coercion. During Petitioner's most shocking period of interrogations, he was submitted to [REDACTED] [REDACTED] interrogation tactics that have long been prohibited by U.S. civil and military law.

Most notably, for example, Petitioner Khan [REDACTED]

[REDACTED]

<sup>5</sup> See, e.g., *United States v. Lee*, 744 F.2d 1124 (5th Cir. 1984) (affirming conviction for "water torture" perpetrated against criminal defendants by a county sheriff and two deputies); *United States of America v. Chinsaku Yuki*, Manila (1946) (military commission convened by Commanding General Phillipines-Ryukus Command convicted Sergeant-Major Chinsaku Yuki of the Kempentai of using "water torture" against individuals in his custody), NARA NND 775011 Record Group 331 Box 1586.







[REDACTED]

In addition to these extreme tactics, throughout his imprisonment, Respondents and other government agencies have subjected Petitioner Khan to a variety of other forms of torture, cruel, inhuman and degrading treatment, and other lesser forms of impermissible coercion. These methods have included:

[REDACTED]

Petitioner seeks a declaratory ruling from this Court that each of these methods

[REDACTED]

[REDACTED] constitute torture in violation of the MCA and other federal law.