

I, Sam Raphael, a citizen of the United Kingdom, hereby declare that:

1. I am 36 years old and currently reside in London, United Kingdom.
2. I have prepared this declaration in conjunction with Communication No. 383/2010, in the matter between Mohammed Abdullah Saleh al-Asad and the Republic of Djibouti.
3. The purpose of my declaration is to provide a graphical presentation of flight data already submitted to the Commission in this matter by John Sifton [See John Sifton Declaration, Exhibit CCC] and Crofton Black [See Crofton Black Declaration]. The flight data confirms Djibouti's involvement with the US rendition program.

Professional background and experience

4. I am a Senior Lecturer in International Relations and Human Rights at Kingston University, United Kingdom.
5. I hold a Doctorate of Philosophy from the University of London, a Master of Arts from the University of London, and a Bachelor of Science from the University of London.
6. I have professionally researched and investigated the U.S. Government's program of extraordinary rendition, secret detention and interrogation since 2010, as Co-Director of The Rendition Project, a joint academic project between myself and Dr. Ruth Blakeley at the University of Kent.

The Rendition Project flight database

7. I have created the world's largest and most comprehensive database of flight data in the public domain relating to aircraft associated with the U.S. extraordinary rendition program. This database includes over 11,000 flights by more than 100 aircraft.¹
8. I have collected the flight data from numerous authoritative sources, including: Eurocontrol (an official international organisation coordinating air travel in European airspace); the U.S. Federal Aviation Administration (FAA); national civil aviation authorities of numerous states; parliamentary investigations at a national level; corporate invoices and other documentation submitted in the *Richmor Aviation v. Sportsflight Air* litigation²; and corporate invoices and other documentation obtained through investigation by Reprieve, and published jointly by The Rendition Project and Reprieve.
9. By bringing together flight data from numerous authoritative sources, I have established the fullest account to date of the movements of suspect renditions aircraft around the world (an account which is nevertheless still incomplete). Individual flights have been linked together into 'flight circuits'.
10. Flight data and analysis which I have compiled has been cited as expert evidence in numerous locations, including:
 - a. Media articles;³
 - b. The European Parliament;⁴
 - c. Evidence submitted to prosecutors in countries known to have hosted CIA 'black sites';⁵ and
 - d. Evidence submitted in litigation at the European Court of Human Rights.⁶

¹ Rendition Flights Database, <http://www.therenditionproject.org.uk/global-rendition/the-flights/index.html>.

² See *Richmor Aviation Inc., v. Sportsflight Air, Inc.*, 918 N.Y.S.2d 806 (2011).

³ E.g., Ian Cobain and James Ball, 'New light shed on US government's extraordinary rendition programme', *The Guardian*, 22 May 2013; 'Rendition flights claim to be investigated by Police Scotland', *BBC News*, 5 June 2013.

⁴ European Parliament, *Joint motion of a resolution on alleged transportation and illegal detention of prisoners in European countries by the CIA*, 2013/2702(RSP).

⁵ REDRESS and Human Rights Monitoring Institute, *Request for an investigation concerning suspicion of criminal offences committed in Lithuania against Mr Mustafa al-Hawsawi*, 13 September 2013.

⁶ In the case of *Abu Zubaydah v. Lithuania*.

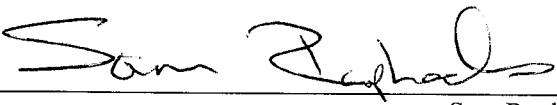
Evidence that aircraft associated with the US rendition program landed in Djibouti at the time that the CIA's global system of rendition and secret detention was in operation

11. Flight data in the public domain, submitted to the Commission already by John Sifton and Crofton Black establishes that aircraft associated with the rendition program landed in Djibouti at least **seven times** in 2003 and 2004, during the period that the CIA was operating its secret prisons network.
12. By viewing these landings in the context of other flight data which I have collated, it is possible to demonstrate that six of the seven flight circuits involved a landing in Afghanistan immediately after the landing in Djibouti, and the seventh circuit involved a landing in Afghanistan immediately before the landing in Djibouti.

Flight Circuit	Aircraft Registration	Dates	Key Route	Annex
1	N63MU	25-29 March 2003	Djibouti (HDAM) – Kabul, Afghanistan (OAKB)	A
2	N379P	14-24 May 2003	Djibouti (HDAM) – Kabul, Afghanistan (OAKB)	B
3	N85VM	15-18 December 2003	Djibouti (HDAM) – Kabul, Afghanistan (OAKB)	C
4	N379P	6-13 March 2003	Djibouti (HDAM) – Kabul, Afghanistan (OAKB) – Rabat, Morocco (GMME) – Guantánamo Bay, Cuba (MUGM)	D
5	N85VM	26-29 April 2004	Djibouti (HDAM) – Kabul, Afghanistan (OAKB)	E
6	N85VM	11-15 June 2004	Kabul, Afghanistan (OAKB) – Djibouti (HDAM)	F
7	N70HS	9-13 November 2004	Djibouti (HDAM) – Kabul, Afghanistan (OAKB)	G

13. Annexes A-G to this declaration provide graphical representations of each of these seven circuits, along with a leg-by-leg account of each of the aircraft's movements. Where information exists, exact dates, departure and arrival times have been included. This information represents the most complete and authoritative account to date in the public domain of each aircraft's movements during the relevant time periods.
14. Where noted by * next to the flight, there is currently an absence of public data proving that this flight took place. However, in these two cases, the aircraft was recorded at the destination airport shortly after it was recorded at the departure airport. In these cases, I have reviewed the existing data in detail, and confirm that a direct flight between the two airports almost certainly took place.
15. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 25 day of October, 2013



 Sam Raphael