

PERIODIC REVIEW BOARD FULL HEARING, 28 MAR 2017
HAROON AL-AFGHANI, ISN 3148
PERSONAL REPRESENTATIVE OPENING STATEMENT

Good Morning Ladies and Gentlemen of the Board. As Haroon's Personal Representative, I would like to thank you for allowing him this second chance to appear before you and to show you that he does not pose a threat to anyone.

With the added assistance and advice of his Private Counsel, Haroon is better prepared to answer your questions more honestly and completely than he was in his Initial Periodic Review Board. Since that time, he has also had an opportunity to put into writing some of the plans that he has been working on during his time here to support himself and his family in the hope that he is approved for transfer. We provided one of his business plans during the File Review and have submitted one more for this Board. As you can see by these two plans as well as the extensive schoolwork that he has provided, he has not been idle during his time here in Guantanamo, but has been constantly working to improve himself and his chances for success in the future. He wants nothing more than to provide for his family and raise his daughter in a safe environment where she can continue her education. He feels it is vital for her to be self-sufficient and to be able to choose her own husband when the time is right.

Haroon is an educated man who speaks five languages, despite the hardships of growing up in a Pakistani refugee camp. While he may have made some bad decisions in the past, his time here has taught him the consequences of those decisions and he will not make those mistakes again. Haroon has never failed to meet with myself or his PC and he has always shown us nothing but respect and courtesy. He has never given any indication of extremist views or any hatred towards Westerners. He has shown that he is only dedicated to providing a better future for his daughter. His only focus is on ensuring that he find honest work so that he can support his family and live a peaceful life. In addition to his skills and dedication, he also has the support of his PC and Reprieve to assist him with the transition wherever he may be transferred.

After considering our submissions and the answers to your questions that Haroon will provide during this Board, I hope that the you will agree that he does not pose a threat to the U.S. or anyone else, and that he should be approved for transfer.

Thank you again for this second chance for Haroon. I look forward to answering any questions you may have during this Board.

UNCLASSIFIED
Approved for Public Release



405 Lexington Ave. Fl. 62
New York, NY 10074

2 March 2017

Re: PC Statement by Shelby Sullivan-Bennis, Private Counsel for Haroon "al-Afghani" Gul (ISN 3148)

Esteemed Periodic Review Board Members:

My name is Shelby Sullivan-Bennis. It is my privilege to represent Haroon "al-Afghani" Gul in this proceeding.

Since I first wrote my PC statement for Haroon's initial Board back in June of last year, a lot has happened. At that time, I had not yet met him in person, but pledged to help as much as I could, regardless.

Since that point, Haroon and I have met over a dozen times in person, we have had many unclassified and classified phone calls in which we discussed the details of his case, his personal history, aspirations for his future, his view on American, Afghan, and Pakistani politics, his daughter, [REDACTED] and others he's left behind, and how best to proceed.

I have had conversations not only with his family members but also with academic experts, whose focus is the geopolitics of the region in which he grew up. I have familiarized myself with his personal history and family life as well as the government's case against him. I have filed a habeas case in his name, requested, received, and reviewed both unclassified and classified factual returns produced by the government and upon which it relies to justify his detention.

I write this statement now with the full weight of that information behind me. Haroon does not pose a threat to the security of our country.

Haroon had never had an attorney before he met me, had never appeared before a single review board for any type of hearing before the one in which you met him. You first met him in a circumstance where he was admittedly intimidated and blatantly scared. We are grateful today for another bite at this all-important apple.

We will aim to fill in any gaps you perceived at Haroon's last hearing. We have a plan for the future, an open explanation of the past, and several existing resources that were not presented previously.

Statement by Private Counsel for Haroon "al-Afghani" Gul (ISN 3148)

REPRIEVE

U.S.

An educated man, Haroon uses his time in Guantánamo as wisely as one can: learning. For his File Review, you will have seen his nearly hundred-page business proposal that he has spent the last couple of years researching. For this hearing, he submits yet another proposed project, an addendum, if you will, to his original plan for a honey bee farm named after his daughter.

With these submissions comes an important revelation: Haroon is productively and actively thinking about how to help himself up from a place we can all agree is quite low. He is not embittered, he is determined.

While Haroon's plan for a honey bee farm may rely on his location, his plan for sustaining himself by using information and resources available to him to build an independent future will work no matter where he is.

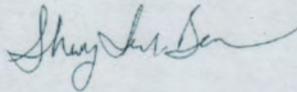
Further to that, Reprieve has the unique capacity to follow Haroon after he is released, to wherever he may land, and facilitate the start-up capital to make his business dreams a reality. We have done this in the past for former detainees and are well-positioned to do the same for Haroon in the future.

As far as there being any possibility that Haroon would join a hostile organization or become a threat to the nation, I think a simple look through his communications over the past nearly 10 years will assuage those fears. A reflective man, the Haroon that I know talks of little else besides his daughter, [REDACTED] and the guilt he feels at having left her effectively fatherless. If the Board does not believe, as I do, that Haroon would reject violence for his own sake, it is clear that he would for hers.

Thank you for your consideration and for the opportunity to change your minds.

Very Truly Yours,

Shelby Sullivan-Bennis
Reprieve US



Statement by Private Counsel for Haroon "al-Afghani" Gul (ISN 3148)