

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

O.K., et al.,)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 04-1136 (JDB)
)	
GEORGE W. BUSH,)	
President of the United States,)	
et al.,)	
)	
Respondents.)	

DECLARATION OF JOHN A. HADJIS

Pursuant to 28 U.S.C. § 1746, I, John A. Hadjis, hereby declare:

1. I am a Colonel in the United States Army, with almost 23 years of active duty service. I currently serve as the Chief Of Staff of Joint Task Force-Guantanamo, Guantanamo Bay, Cuba ("JTF-GTMO"), and have served in that position since 28 July 2004. The JTF-GTMO has several subordinate units, including the Joint Detention Operations Group (JDOG). The mission of the JDOG is to provide for the safe and humane custody and control of enemy combatants at Guantanamo Bay, Cuba in support of the Global War on Terrorism. In addition, the JDOG provides security for JTF detention facilities. The JDOG undertakes the detention of enemy combatant detainees at GTMO in a humane manner that protects the security of both detainees and personnel at GTMO. In my capacity as Chief Of Staff for the Commander, Joint Task Force - Guantanamo, I am familiar with all JTF-GTMO operations, including those performed by the JDOG.
2. The mission of JDOG involves humane detention of the detainees. Consistent with that mission, and with the President's directive to the Military to treat detainees humanely, we do not permit the mistreatment or abuse of detainees. We have detailed standard operating procedures and training programs to ensure that the detainees are treated appropriately and that any violations of our procedures are investigated. These procedures apply to all personnel having contact with detainees, whether security, intelligence, or law enforcement personnel.
3. Over 500 individuals are currently detained at GTMO. All detainees receive adequate shelter, food and water, and medical care at all times. Detainees are housed in areas providing adequate shelter from the elements and with adequate

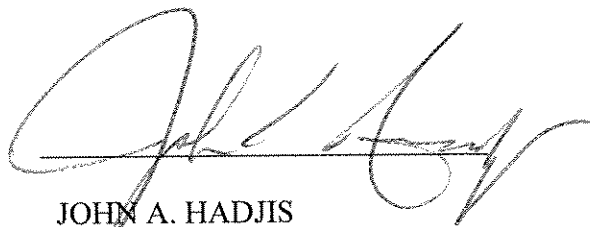
ventilation. They have access to potable drinking water and receive at least three meals per day that meet cultural dietary requirements. Detainees are provided with means to maintain adequate hygiene, including opportunities for showers. Medical care is available 24 hours a day.

4. An important aspect of detention is the maintenance of discipline among the detainees. This is for the safety, and security of all personnel within the detention facility, including detainees. The JDOG uses a system of detainee discipline and positive behavior rewards programs tied to a detainee's compliance with camp rules. Detainee violations of camp rules are reported through the guard force chain of command to the appropriate officer or commander who has authority to take action based on the type of violation involved. This system provides for the fair and consistent delivery of consequences for negative behavior by detainees and rewards for positive behavior.
5. Detainees are not granted or denied privileges, disciplined, or otherwise discriminated against on account of their being involved in habeas corpus litigation or having met with legal counsel.
6. A forced cell extraction or forced cell movement is used when a detainee refuses to leave his cell or some other location, and efforts to obtain compliance or to stop the detainee from acting out without the use of physical force have not been successful. A team of guards, who have been trained to enter a confined space, such as a cell, and secure the detainee in a safe manner, conducts these movements. The guards wear protective clothing when conducting a cell extraction. We refer to the team of guards who perform this task as the Initial

Response Force. A forced cell extraction or forced cell movement is not used as an interrogation technique.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Dated: April 13, 2005

A handwritten signature in black ink, appearing to read "John A. Hadjis", written over a horizontal line.

JOHN A. HADJIS
Colonel, US Army