

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOHN DOE,

Petitioner,

v.

GEN. JAMES N. MATTIS,
in his official capacity as SECRETARY OF
DEFENSE,

Respondent.

No. 17-cv-2069 (TSC)

ECF 106-4

REDACTED VERSION FOR PUBLIC FILING

~~UNDER SEAL~~

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DECLARATION OF NOAH BONSEY

I, Noah Bonsey, declare as follows:

1. I am the Senior Syria Analyst at the International Crisis Group, a position I have held since April 2013.
2. The International Crisis Group provides in-depth reporting on conflicts and vulnerable countries. We conduct independent field research, and produce fact-based reporting together with precise analysis, in order to influence policy and policy-makers with recommendations that can prevent or resolve conflict.
3. My responsibilities include conducting field-based research on the conflict in Syria, meeting with officials and representatives of the war's main actors (for research and advocacy purposes), and authoring reports and other analytical products assessing conflict dynamics and opportunities to reduce violence. I speak Arabic, lived and studied in Syria prior to the conflict, and travel regularly to [REDACTED] and throughout the region to conduct my work.

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4. Much of my work focuses on [REDACTED] Syria. I have visited areas held by the Syrian Democratic Forces (“SDF”) seven times since December 2015, most recently in January 2018. During these research trips, I have met repeatedly with SDF personnel and leaders and representatives of the People’s Protection Units (“YPG”), the Kurdish-led faction that dominates the SDF [REDACTED]. I have also met with leaders and representatives of the YPG’s political wing, the Democratic Union Party (“PYD”), and the “Autonomous Administration,” [REDACTED] [REDACTED].
5. I do not have any personal knowledge of the facts surrounding the United States’ detention of the unnamed dual U.S.-Saudi citizen (“John Doe”) who is the subject of the this action. My declaration is based on publicly available information about Doe and information provided to me by Doe’s attorneys. My conclusions are informed by my field research and analysis.
6. As the State Department’s travel advisory correctly notes, “No part of Syria is safe from violence.” This remains an unpredictable war, in which areas temporarily enjoying relative security can quickly see conditions deteriorate as conflict dynamics shift—as seen recently in Afrin, where in early 2018, Turkish-backed forces launched a major, ultimately successful military operation to capture what had been a relatively stable area under YPG control.
7. Security conditions vary within [REDACTED]. Certain SDF-held areas of [REDACTED] [REDACTED] are currently more secure than other parts of the country that are outside or on the fringes of government control. But even in the SDF-held areas, significant security incidents are relatively common, [REDACTED].

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[REDACTED]

[REDACTED]. Questions over the future of the U.S. presence introduce additional uncertainty and risk. A near-term U.S. withdrawal from [REDACTED], now the expressed preference of the President of the United States, would remove the security umbrella that currently deters external attack on SDF-held areas. The risk of a major increase in violence in the area would soar accordingly.

8. The area around [REDACTED] is considered more dangerous than most SDF-held territory. [REDACTED]

[REDACTED] contribute to a fragile security environment, [REDACTED]
[REDACTED].

9. As part of their efforts to improve security and maintain control, the SDF and affiliated security bodies operate multiple checkpoints throughout [REDACTED]. Residents of SDF-held areas do not necessarily enjoy freedom of movement. I have travelled by car throughout much of SDF-held territory. I do so carrying my official passport, a document from the Autonomous Administration authorizing me to be in the territory, and a permit from the Administration listing the specific places to which I am authorized to travel for my work purposes.

10. During the course of my work, I have personally had to cross through numerous SDF and affiliated-force checkpoints. The personnel at these checkpoints review the identification documents of those passing through, and in some cases prevent them from passing. Foreign visitors also have their identifications checked, and in some cases must show authorization from the SDF or Autonomous Administration in order to pass through checkpoints. Doe's status as a non-Syrian would likely attract the attention of checkpoint

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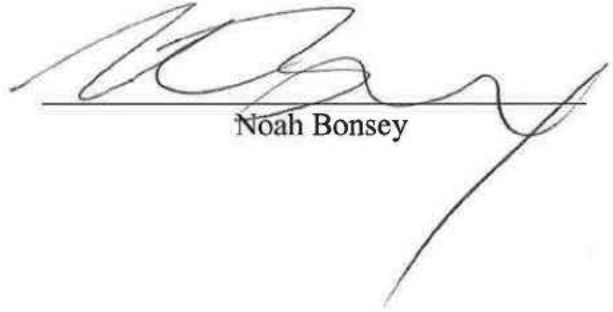
personnel, and they would likely view with suspicion [REDACTED]

- [REDACTED].
11. The SDF is especially wary of fighting-age males who lived previously in ISIS-held areas. Within that demographic, non-Syrians—i.e. suspected foreign fighters—can be expected to draw particular scrutiny. In other words, someone of Doe’s profile is likely to be viewed as a potential security threat.
 12. Doe’s options are not secure. As noted in the State Department’s travel warning and the points above, his situation would be precarious even if granted the freedom to live [REDACTED] or another SDF-held area. The State Department has advised U.S. citizens who seek consular services to “quickly and safely leave the country and contact a U.S. embassy or consulate in a neighboring country.” Yet if Doe does not have travel documents, attempting to do so could prove extraordinarily dangerous.
 13. Doe’s only option would be to attempt an illegal border crossing to try and reach a U.S. consulate or embassy. This cannot be done without putting his life at grave risk. Unauthorized border crossers from SDF territory have been shot by Turkish border guards, and attempting unauthorized crossing into Iraq is also likely to be prohibitively dangerous. Nor does crossing into adjacent areas held by Turkish-backed opposition forces (known as “Euphrates Shield”) or the Syrian government offer better prospects. Security conditions are poor in “Euphrates Shield” areas, with unpredictable outbreaks of violence exacerbated by in-fighting among armed factions. And Doe’s status as a fighting-age male holding U.S.-Saudi citizenship would presumably render him unwelcome (and subject to detention and worse) in government areas.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 21, 2018
New York, NY



Noah Bonsey