

CASE ANNEX

EXTRAORDINARY RENDITION

Date	Individuals	Facts
1995 or 1998 ¹	Talaat Fouad Qassem <i>Described as one of Egypt's most wanted Islamic militants</i>	U.S. intelligence agents reportedly picked up Quassem from Croatia, placed him on a ship in the Adriatic Sea for interrogation, and subsequently turned him over to Egyptian authorities who had in 1992 sentenced him to death <i>in absentia</i> . His family believes he was executed in Egypt. ²
1998	1. Ahmed Osman Saleh 2. Ahmed Ibrahim al-Naggar 3. Shawki Salama Attiya 4. Essam Abdel Tawwab 5. Mohamed Hassan Tita ³ <i>Alleged members of Egyptian Islamic Jihad</i>	CIA officers working with the Albanian police reportedly seized five individuals, who were alleged to have been planning to bomb the U.S. embassy in Tirana. After three days of interrogation, the men were flown to Egypt, allegedly aboard a CIA-chartered plane. ⁴
October 2001	Aseed Mohammed <i>Yemeni microbiology student; alleged al-Qaeda operative</i>	Mohammed was allegedly flown from Pakistan to Jordan on a U.S.-registered Gulfstream jet after Pakistan's intelligence agency reportedly surrendered him to U.S. authorities at the Karachi airport. U.S. officials alleged that Aseed Mohammed was an Al Qaeda operative who played a role in the bombing of the USS <i>Cole</i> . The handover of the shackled and blindfolded Aseed Mohammed reportedly took place in the middle of the night in a remote corner of the airport, without the benefit of extradition or deportation procedures. ⁵

¹ There are conflicting reports as to the date of this detainee's arrest. Rajiv Chandrasekaran and Peter Finn, *U.S. Behind Secret Transfer of Terror Suspects*, WASHINGTON POST FOREIGN SERVICE, March 11, 2002; Anthony Shadid, *America Prepares the War on Terror; U.S., Egypt Raids Caught Militants*, BOSTON GLOBE, Oct. 7, 2001, at A1

² Anthony Shadid, *supra* note 1; *U.S., Egypt Raids Caught Militants*, BOSTON GLOBE, Oct. 7, 2001, at A1.

³ Andrew Higgins and Christopher Cooper, *CIA-Backed Team Used Brutal Means To Break Up Terrorist Cell in Albania*, WALL STREET JOURNAL, Nov. 20, 2001.

⁴ *U.S. Bypasses Law in Fight against Terrorism*, INTERNATIONAL HERALD TRIBUNE, Mar. 12, 2002; Chandrasekaran & Finn, *supra* note 1.

⁵ *U.S. Bypasses Law in Fight against Terrorism*, *supra* note 4; Chandrasekaran & Finn, *supra* note 1.

December 18, 2001	<p>1. Ahmed Agiza 2. Mohammed al-Zari</p>	<p>Agiza and al-Zari were expelled from Sweden and transferred to Egypt. According to the Swedish TV program <i>Kalla Fakta</i>, both men were flown on a Gulfstream V jet alleged to be owned by a U.S. company and which reportedly is used mainly by the U.S. government.⁶</p> <p>The Swedish government relied upon “diplomatic assurances” from the Egyptian government that the two men would not be tortured and would have fair trials upon return. U.S. agents were involved in the transfer of Agiza and al-Zari. The CAT Committee recently held that in deporting Agiza and al-Zari to Egypt Sweden violated the Convention Against Torture.</p>
January 11, 2002	<p>1. Muhammad Saad 2. Iqbal Madni</p> <p><i>Suspected by the CIA of having worked with Richard Reid (the “shoe-bomber”).⁷</i></p>	<p>Madni was detained by Indonesian authorities. A few days later, the Egyptian government formally asked Indonesia to extradite Iqbal, who carried an Egyptian as well as a Pakistani passport.⁸ The Egyptian request apparently did not specify the crime, instead noting broadly that Egypt sought Iqbal in connection with terrorism.⁹ On January 11, 2002, allegedly without a court hearing or a lawyer, Iqbal was put aboard an unmarked U.S.-registered Gulfstream V jet and flown to Egypt.¹⁰</p>
September 2002	<p>Maher Arar</p> <p><i>Was suspected to have connections with al-Qaeda; no evidence of this, however, was ultimately found</i></p>	<p>While in transit at John F. Kennedy International Airport in New York in September 2002, Syrian-born Canadian citizen, Maher Arar¹¹ was taken into custody by officials from the FBI and Immigration and Naturalization Service (since reorganized into the Department of Homeland Security) and shackled.¹² Arar’s requests for a lawyer</p>

⁶ *The Broken Promise*, (TV4 Kalla Fakta Broadcast, May 17, 2004) (English transcript available at <http://hrw.org/english/docs/2004/05/17/sweden8620.htm> (last visited Oct. 25, 2004)) (TV4 Kalla Fakta Broadcast); see also SEYMOUR HERSH, CHAIN OF COMMAND 54 (HarperCollins, 2004).

⁷ *U.S. Bypasses Law in Fight Against Terrorism*, supra note 4; Chandrasekaran & Finn, supra note 1.

⁸ *U.S. Bypasses Law in Fight Against Terrorism*, supra note 4; Chandrasekaran & Finn, supra note 1.

⁹ *U.S. Bypasses Law in Fight Against Terrorism*, supra note 4; Chandrasekaran & Finn, supra note 1

¹⁰ *U.S. Bypasses Law in Fight Against Terrorism*, supra note 4; Chandrasekaran & Finn, supra note 1; Dana Priest & Joe Stephens, *Secret World of U.S. Interrogation: Long History of Tactics in Overseas Prisons Is Coming to Light*, WASHINGTON POST, May 11, 2004, at A1.

¹¹ For more information about Maher Arar and his transfer to Syria, see www.ararcommission.ca

¹² According to a lawsuit filed by Arar against Attorney General John Ashcroft and other U.S. officials, Larry D. Thompson (then Acting Attorney General), J. Scott Blackman (then Regional Director of the Immigration and Naturalization Services for the Eastern District), Edward J. McElroy (formerly District Director for the Immigration and Naturalization Services for the New York City District and presently District Director of U.S. Immigration and Customs Enforcement), Robert Mueller (Director of the Federal Bureau of Investigation), and

		were dismissed on the basis that he was not a U.S. citizen and therefore he did not have the right to counsel. ¹³ U.S. immigration authorities authorized Arar’s “expedited removal” to Syria under section 235(c) of the INA. Arar was eventually put on a small jet that first landed in Washington, D.C., and then in Amman, Jordan. ¹⁴ Arar was then transferred to Syria. ¹⁵ Arar remained in Syria for ten months during which he was allegedly beaten, tortured, and kept in a shallow grave. ¹⁶ Arar has since returned to Canada. No arrest warrants have ever been issued for him. The Canadian government is currently conducting an inquiry into his “extraordinary rendition.” The United States refuses to cooperate with the inquiry.
2001 (arrested and transferred to Egypt); 2002 (transferred to Guantánamo).	Mamdouh Habib	Habib, an Australian national, was arrested in Pakistan and, reportedly at the request of the U.S. authorities, flown to Egypt where he was allegedly severely tortured. ¹⁷ Habib remained in Egypt for six months, then was transferred to Guantánamo. ¹⁸ On January 11 2005, Mamdouh Habib was released from Guantánamo without charge and subsequently transferred to Australia.
Fall 2001	Ibn al-Sheikh al- Libi <i>Suspected of running Osama bin Laden’s terrorist training camp in Khalden and wanted as a witness in the cases</i>	Al-Libi, a Libyan national, was arrested in Pakistan and in January 2002 was reportedly handed over to CIA agents stationed in Afghanistan. ²⁰ The CIA allegedly became frustrated with the ability of its operatives in Afghanistan to obtain information from al-

others, unlawfully detained and interrogated Arar for thirteen days. Complaint and Demand for Jury Trial, filed with the U.S. District Court, Eastern District of New York in *Arar v. Ashcroft, et al.*, available at http://www.ccr-ny.org/v2/legal/september_11th/docs/ArarComplaint.pdf (last visited Oct. 25, 2004). For additional information on the case of Maher Arar, see <http://www.maherarar.ca/>.

¹³ *Id.*

¹⁴ *Id.* para. 49.

¹⁵ Despite the fact that he is a Canadian citizen and has resided in Canada for seventeen years, Arar’s pleas to return to Canada were ignored *Id.* paras. 53, 62. Upon reaching Syria, Arar was transferred to a prison where he was allegedly beaten for several hours and forced to falsely confess that he had attended a training camp in Afghanistan in order to fight against the United States. *Id.*

¹⁶ *Id.* para 61; see also Priest & Stephens, *supra*, note 10.

¹⁷ *The Trials of Mamdouh Habib* (SBS, Dateline, July 7, 2004) (transcript available at <http://www6.sbs.com.au/dateline/index.php?page=archive&daysum=2004-07-07#> (last visited Oct. 25, 2004).

¹⁸ Joint Press Release, Attorney-General The Hon. Daryl Williams AM QC MP and Minister for Foreign Affairs and Trade The Hon. Alexander Downer MP, Mamdouh Habib in United States Custody (Apr. 18, 2002), available at <http://www.ag.gov.au/www/attorneygeneralhome.nsf/0/49DF56AF955E312CCA256B9F007F44FA?OpenDocument> (last visited Oct. 25, 2004); *The Trials of Mamdouh Habib*, *supra* note 17.

	<i>against Zacarias Moussaoui and Richard Reid.</i> ¹⁹	Libi and transferred him first to the U.S.S. Bataan, an assault ship stationed in the Arabian Sea, where he was interrogated by FBI and CIA agents ²¹ , and then to Egypt for harsher questioning. ²² According to <i>Newsweek</i> , officials eventually retrieved al-Libi from Egyptian custody and transferred him to Guantánamo Bay. ²³
February 2003	Hassan Osama Nasr (a.k.a. Abu Omar) <i>Was suspected of being involved in the planning of terrorist activities</i>	Egyptian-born Abu Omar disappeared from his home city of Milan in February 2003. He briefly surfaced 15 months later, when he called his family in Italy claiming to have been kidnapped by U.S. and Italian forces, taken to Egypt and tortured. ²⁴ Based on the latest available information, Abu Omar is being held in the Tora prison on the edge of the Egyptian capital Cairo. ²⁵ Italian authorities are currently conducting an inquiry into Nasr's purported kidnapping. ²⁶ On June 23, 2005, an Italian judge issued arrest warrants for 13 C.I.A. agents in connection with Abu Omar's kidnapping and disappearance. On the same day, another Italian judge issued an indictment against Abu Omar. ²⁷
December 31, 2003	Khaled el-Masri	El-Masri, a German citizen born in Lebanon, was arrested by police at the Macedonian border. He was then reportedly held in a Macedonian hotel room for 23 days. During this time he says he was constantly

¹⁹ Jane Mayer, *Outsourcing Torture: The Secret History of America's "Extraordinary Rendition" Program*, THE NEW YORKER (Feb. 14, 2005), available at www.newyorker.com/printables/fact/050214fa_fact6 (last visited May 9, 2005).

²⁰ Dana Priest, *Al Qaeda-Iraq Link Recanted, Captured Libyan Reverses Previous Statement to CIA, Officials Say*, WASHINGTON POST Aug. 1, 2004, at A20.

²¹ See Human Rights Watch, *The United States "Disappeared" The CIA's Long-Term "Ghost Detainees" Annex*, available at http://www.hrw.org/backgrounder/usa/us1004/7.htm#_Toc84652978; *Intelligence might have thwarted attacks, Senior Taliban fighters taken into custody*, CNN.COM, Jan. 9, 2002, available at <http://archives.cnn.com/2002/WORLD/asiapcf/central/01/08/ret.afghan.attacks/>.

²² *Id.*

²³ *Id.*

²⁴ Tracy Wilkinson & Bob Droggin, *Missing Imam's Trail Said to Lead from Italy to CIA; Prosecutors in Milan are investigating whether an Egyptian-born suspected militant was spirited away by the U.S. using a disputed tactic*, LOS ANGELES TIMES, Mar. 3, 2005, at A1.

²⁵ *Italy: rendition victim alive and in prison*, ADNKRONISINTERNATIONAL, available at http://www.adnki.com/index_2Level.php?cat=Terrorism&luid=8.0.180983052&par=0 (last visited June 27, 2005).

²⁶ *Missing Imam's Trail Said to Lead from Italy to CIA; Prosecutors in Milan are investigating whether an Egyptian-born suspected militant was spirited away by the U.S. using a disputed tactic*, *supra* note 24.

²⁷ John Crewdson, Tom Hundley and Liz Sly, *Italy charges CIA agents: In rare act by ally, officials seek arrests of U.S. agents in kidnapping of imam who allegedly was tortured in Egypt*, CHICAGO TRIBUNE, June 25, 2005, available at <http://www.chicagotribune.com/news/local/chi-0506250082jun25.1.1086508.print.story?coll=chi-news-hed&ctrack=1&csset=true> (last visited June 27, 2005).

		<p>interrogated by Macedonain agents about connections to Islamic organizations and accused of having been in a terrorist training camp in Jalalabad.²⁸ At the end of this time he was allegedly beaten, stripped, shackled, blindfolded, and placed aboard a plane. El-Masri was delivered to a prison in Afghanistan that he says was nominally run by Afghan officials but was actually under U.S. control.²⁹ While in the prison he was repeatedly interrogated, and photographed naked by individuals el-Masri identified as U.S. agents. U.S. authorities have neither confirmed nor denied these allegations.³⁰ In May of 2004, el-Masri was returned to Europe, having never been charged with a crime. A reporter, Stephen Grey and the ZDF television show <i>Frontal 21</i>, have independently determined that the details of al Masri's statement coincide with the flight schedule of a U.S.-chartered Boeing 737 used by the CIA.³¹ El-Masri's release was reportedly personally ordered by Secretary of State Rice after she learned the man had been mistakenly identified as a terrorist suspect.³² German authorities are currently investigating the case.</p>
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²⁸ James Meek, *They beat me from all sides*, GUARDIAN (London), Jan. 14, 2005, at 2.

²⁹ *Id.*

³⁰ *Id.*

³¹ Scott Shane, Stephen Grey, Margot Williams, *C.I.A. Expanding Terror Battle Under Guise of Charter Flights*, THE NEW YORK TIMES, May 31, 2005.

³² *Innocent German beaten by US jailers*, SYDNEY MORNING HERALD, Apr. 25, 2005, available at <http://www.smh.com.au/news/Global-Terrorism/Innocent-German-beaten-by-US-jailers/2005/04/24/1114281451199.html?oneclick=true> (last visited May 9, 2005); David Johnston, Don Van Natta, *Rice Ordered Release of German Sent to Afghan Prison in Error*, NEW YORK TIMES, Apr. 23, 2005, at A3.

REVERSE RENDITION³³

Date	Name	Facts
January 17, 2002	1. Bensayah Belkacem 2. Hadj Boudellaa 3. Saber Lahmar 4. Mustafa Ait Idir 5. Boumediene Lakhdar 6. Mohamed Nechle ³⁴	Just a few hours after Bosnia's Supreme Court ordered the release from detention of the six individuals for lack of evidence justifying their detention, Bosnian police handed them over to U.S. authorities, who reportedly flew them to Guantánamo Bay. ³⁵ The Human Rights Chamber of Bosnia-Herzegovina subsequently noted that "there was no evidence to suggest that the hand-over of the [individuals] can be interpreted to be an extradition." ³⁶ The Chamber held that the transfer of the individuals to the custody of U.S. forces "without seeking and receiving any information as to the basis of the detention constitutes a breach of [Bosnia and Herzegovina's and the Federation of Bosnia and Herzegovina's] obligations to protect the [individuals] against arbitrary detention by foreign forces." ³⁷
September 19, 2002	Abd al-Salam Ali al-Hila <i>Yemeni businessman and intelligence official</i>	Within weeks of his arrival in Cairo for a series of business meetings, al-Hila disappeared. ³⁸ It is believed that Al-Hila was taken first to Baku, Azerbaijan, then transferred to U.S. custody in Afghanistan, and after being held in Afghanistan for approximately sixteen months, was sent to Guantánamo Bay, where he is still being held. ³⁹

³³ The transfers of Mamdouh Habib and Ibn al-Sheikh al-Libi to Guantánamo Bay can also be characterized as "reverse renditions."

³⁴ Amnesty International, *Bosnia-Herzegovina Unlawful detention of six men from Bosnia-Herzegovina in Guantánamo Bay*, available at [http://web.amnesty.org/library/pdf/EUR630132003ENGLISH/\\$File/EUR6301303.pdf](http://web.amnesty.org/library/pdf/EUR630132003ENGLISH/$File/EUR6301303.pdf) (last visited June 23, 2005).

³⁵ *Coming to Light*, WASHINGTON POST, May 11, 2004, at A1.

³⁶ *Boudellaa et al. v. Bosnia and Herzegovina and the Federation of Bosnia and Herzegovina*, Cases Nos. CH/02/8679, CH/02/8689, CH/02/8690 and CH/02/8691, Human Rights Chamber for Bosnia and Herzegovina, Oct. 2002, para. 227.

³⁷ *Id.* para. 233. The Human Rights Chamber noted that "[c]onsidering the broad interpretation of the term jurisdiction, this obligation arises even if under the Dayton Peace Agreement [Bosnia and Herzegovina and the Federation of Bosnia and Herzegovina] had no direct jurisdiction over U.S. forces stationed in Bosnia and Herzegovina." *Id.*

³⁸ Human Rights Watch, *Guantánamo: New "Reverse Rendition" Case: A Detainee Captured in Egypt Disappeared in U.S. Custody*, Mar. 30, 2005, available at <http://www.hrw.org/english/docs/2005/03/29/usint10382.htm> (last visited May 9, 2005).

³⁹ *Id.*

June 17, 2003	Adil Al-Jazeerai	An Algerian National, Al-Jazeerai ⁴⁰ was reportedly arrested by Pakistani authorities on June 17, 2003 in Pakistan's province of Peshawar. ⁴¹ According to Pakistani intelligence officials speaking on condition of anonymity, on July 13, 2003, "Adil al-Jazeerai was blindfolded with his hands tied behind his back while he was taken to an American plane in Peshawar." ⁴² Al-Jazeerai's arrest and U.S. custody were confirmed by the United States in a December 2003 State Department report; ⁴³ however, his location remains unknown. According to various reports, it is believed that al-Jazeerai was transferred to Afghanistan, and was being held at Bagram Air Force Base. ⁴⁴ Al-Jazeerai's family has reportedly received letters from him originating from Bagram Air Force Base. ⁴⁵ Since his arrest his family has received no formal notification of his detention from Pakistani authorities. ⁴⁶
December 2001	Abdallah Tabarak	Tabarak, a Moroccan national, was reportedly arrested in Pakistan in December 2001 by Pakistani officials. ⁴⁷ According to media reports and Tabarak's own account, he was subsequently transferred to U.S. custody in Kandhar, Afghanistan ⁴⁸ and then to

⁴⁰ *Pakistan hands over al-Qaeda Suspect*, BBC NEWS, Jul. 15, 2003, available at http://news.bbc.co.uk/1/hi/world/south_asia/3067135.stm (last visited June 23, 2005); Human Rights Watch, *The Road to Abu Ghraib*, 12, n.27, available at <http://www.hrw.org/reports/2004/usa0604/usa0604.pdf> (last visited June 23, 2005); Amnesty International, *America: Incommunicado detention / Fear of ill-treatment, Adil al-Jazeerai*, July 16, 2003, available at <http://web.amnesty.org/library/Index/ENGAMR511032003?open&of=ENG-DZA> (last visited June 23, 2005).

⁴¹ Amnesty International, *supra* note 40; *Pakistan captures terrorists*, BILLINGS GAZETTE, Jun. 19, 2003, available at <http://www.billingsgazette.com/index.php?id=1&display=rednews/2003/06/19/build/world/w-60-paki.inc> (last visited June 23, 2005).

⁴² *Alleged Qaeda Big Goes To Bagram*, CBS NEWS, July 14, 2003, available at <http://www.cbsnews.com/stories/2003/07/14/attack/main563079.shtml> (last visited June 23, 2005); *The United States "Disappeared" The CIA's Long-Term "Ghost Detainees," supra* note 21; Amnesty International, *supra* note 40.

⁴³ U.S. Department of State, *FY 2003 Performance and Accountability Report, Strategic Goal 2: Counterterrorism - Performance Summary, Resources Invested, and Illustrative Example of Significant Achievement*, Dec. 2003, available at <http://www.state.gov/m/rm/rls/perfrpt/2003/html/28996.htm> (last visited June 23, 2005).

⁴⁴ *Alleged Qaeda Big Goes to Bagram, supra* note 42; *Pakistan hands over al-Qaeda Suspect, supra* note 40; Amnesty International, *supra* note 40.

⁴⁵ *Adil a-Jazeerai, Cageprisoner Profile*, Cageprisoners.com, May, 7, 2005, at <http://www.cageprisoners.com/prisoners.php?id=1366> (last visited June 23, 2005).

⁴⁶ *Id.*

⁴⁷ Jason Burke, *Terror Backlash: Global web of secret US prisons: Jason Burke charts the worldwide hidden network of jails where more than 3,000 al-Qaeda suspects have been held without trial - and many subjected to torture - since 9/11*, THE OBSERVER, June 13, 2004.

⁴⁸ Jason Burke, *Secret world of US jails*, GUARDIAN, Jun. 13, 2004, available at <http://observer.guardian.co.uk/international/story/0,6903,1237589,00.html> (last visited June 23, 2005); Khadija Ali Moussa, *Released Moroccan Guantanamo Detainee Tells Islamist Paper of his "ordeal,"* published by Moroccan Islamic movement Tawhid wal Islah daily newspaper Attajdid, 28 December, reported in BBC MONITORING INTERNATIONAL REPORTS, December 30, 2004.

	<p>Guantánamo Bay detention center.⁴⁹ The ICRC was reportedly unable to visit Tabarak until at least until late February 2004, though it appears he had been in detention there for some time.⁵⁰ Tabarak was, however, visited by Moroccan officials who interviewed him and other Moroccan citizens.⁵¹ On August 1, 2004, Tabarak was repatriated to Morocco⁵² where he was detained pending trial on charges of “belonging to a criminal group, non-denunciation of a crime harming State security, assistance to a criminal group by transferring money to Moroccans with the aim of creating a gang that threatens Morocco's interests and participation in the forging of a passport.”⁵³ Moroccan court proceedings against Tabarak and five others began on December 6, 2004, after which Tabarak and two other Moroccan co-defendants were released on bail on December 20, 2004.⁵⁴ The trial had been originally postponed until March 7, 2005 and was adjourned again to July 4, 2005.⁵⁵</p>
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⁴⁹ *Terror Backlash*, *supra* note 47.

⁵⁰ *Id.*

⁵¹ Peter Finn, *Captive helped trick US while bin Laden escaped*, WASHINGTON POST, Jan. 22 2003, available at <http://www.smh.com.au/articles/2003/01/21/1042911381796.html> (last visited June 23, 2005).

⁵² *Guantánamo: Abdullah Tabarak (Repatriated)*, CAGEPRISONERS.COM, June 23, 2005, available at <http://www.cageprisoners.com/prisoners.php?id=69> (last visited June 23, 2005).

⁵³ Karima Rhanem *A trial without a case Moroccan Ex-Guantánamo detainees' hearing postponed to March 7*, MOROCCO TIMES, Feb. 24 2005, available at <http://www.moroccotimes.com/paper/article.asp?idr=2&id=4117> (last visited June 23, 2005).

⁵⁴ *Id.*

⁵⁵ *See Suspected former bodyguard of Osama bin Laden appears in Moroccan court*, ASSOCIATED PRESS WORLDSTREAM, Dec. 27, 2004; *Morocco frees former Guantánamo detainees pending trials*, AGENCE FRANCE PRESSE, Mar. 28, 2005, available at <http://www.middle-east-online.com/english/morocco/?id=13076> (last visited June 23, 2005).

RENDITION TO JUSTICE

A list of individuals who have been transferred pursuant to the “rendition” procedures is not publicly available.

TRANSFERS TO A SECRET DETENTION FACILITY OUTSIDE THE UNITED STATES

For a list of individuals who have been “disappeared” or possibly transferred to a secret detention facility in a foreign country, see *The United States “Disappeared” The CIA’s Long-Term “Ghost Detainees”*⁵⁶ and *Secret Detentions and Proxy Prisons: Legal Standards Applicable to Disappearances*.⁵⁷

TRANSFERS OUT OF GUANTÁNAMO BAY

A list of individuals who have been transferred out of Guantánamo Bay into the custody of a foreign state is not publicly available.

⁵⁶ *The United States “Disappeared” The CIA’s Long-Term “Ghost Detainees,”* *supra* note 21.

⁵⁷ Center for Human Rights and Global Justice, *Secret Detentions and Proxy Prisons: Legal Standards Applicable to Disappearances*, forthcoming July 2005.