

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA**

**CRIMINAL NO. 13-20772**

**Plaintiff,**

**HON. GERSHWIN DRAIN**

**RASMIEH ODEH**

**Defendant.**

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**RASMIEH ODEH'S SENTENCING MEMORANDUM**

**I. PRELIMINARY STATEMENT**

Rasmea Odeh, a 67 year old Palestinian-American woman who has lived a peaceable and productive life in America for 20 years, stands convicted of giving false answers on her citizenship application ten years ago; she was also implicated in giving roughly the same answers on an immigration visa application ten years before that. As the Court heard, she first came to the U.S. in 1994, at the behest of her brother, to care for their ailing father. Years later, when both had died, she found a vocation in community service, in Chicago, and she has spent the last ten years working with the Arab-American Action Network there, rising from an unpaid volunteer to associate director. The Court has heard evidence about her outstanding work in this role, and more is contained within.

The Court has also heard evidence, of course, that the false answers defendant was convicted of putting on the naturalization form ten years ago

primarily concerned the fact that she had previously been arrested, charged, convicted and imprisoned in Israel, thirty-five years prior, for alleged involvement in two bombings in Tel Aviv, in 1969, carried out as part of the Palestinian resistance to Israel's occupation of the West Bank in the wake of the 1967 so-called six-day war. The defendant asserted that she had been taken in a round-up of hundreds of people, after the bombings, and had been brutally tortured in the "Moscow Villa" interrogation center for twenty-one days, until she gave a confession, which—with those of several co-defendants also obtained by torture—was used to convict all of them in a military court, and she received a life sentence.

The Court learned further that her sentence was commuted by Israel, after ten years, and she was released, in a prisoner exchange. She landed up first in Beirut, where she had lived for a time as a student just after the 1967 war, then finally in Jordan, in or about 1982, where she lived and worked, and continued her education, until her brother sent for her in 1994.

Before the trial, the defendant told the Court she had learned that she suffered from Post-Traumatic Stress Disorder (PTSD), and had come to understand that this lay behind her belief, at the time of the application, that the questions referred only to her years in the United States—that is, she had a mental block against forming answers to the application which derived from or referred to her experience of torture and terror and breaking down. The Court found itself constrained—despite finding the defendant's testimony "credible" as to the torture—to rule that such a 'diminished capacity' defense was barred by the nature of the offense charged. This of course is the defendant's substantial issue on appeal, where in her view the statute specifies a culpable intention which—due to a

psychological affliction visited upon her by way of unlawful war and occupation, and torture—she was blocked from being able to form.

Without this defense—and with her own everyday mental protections against horrid memories shouldered aside, needless to say, by the immediacies of case and trial—she struggled during her testimony to remember the naturalization interview with Ms. Robinson, the agent who processed her naturalization application in 2004. She said didn't remember any extra prompting by the immigration interviewer about “anywhere in the world”, on the questions about arrest, etc., and didn't believe it had happened. Nothing else on the form or in the interview had caused her to think about her imprisonment in Israel, and the torture, during the interview; at that time her personal PTSD defenses apparently held firm.

In the trial, of course, Ms. Odeh's defense mechanisms were totally overcome, and sidelined, as they had been generally since the indictment was announced; and she was living with the nightmares ‘up close and personal’. As the Court will well remember, she became fixated on showing that the arrest involved in the answered questions in her naturalization process had been illegal, and the charge and conviction and imprisonment had been brought about by torture. It was as if she went from blocking out the memory to being unable to think of anything else.

As the Court experienced directly, her desire to tell the whole story of what she experienced was triggered to the point where she could not accept being silenced; as a result she clashed with the prosecutor during cross-examination, and also with the Court. This should not be held against her now. From her perspective the whole point—and the reason she elected to refuse a highly

favorable plea agreement, was to declare the truth about what had been done to her by the Israeli military. As the Court will recall, her attempts to do so, while somewhat disruptive (and certainly not helpful to her cause) cannot seriously be said to have obstructed the proceedings in any material way.

### **Prosecution's Position**

The Government, for its part, insists that the defendant be branded a terrorist, and sentenced accordingly, based on a conviction for bombings obtained in an illegitimate military trial, conducted by war criminals, 45 years ago. Their position is that only the bombing matters: Not the illegal 1967 massacres and occupation—let alone the military ethnic cleansing of 750,000 Palestinians from the land and their homes when Palestine was partitioned in 1948—not the midnight sweeps and kidnaping by the invading Army after the 1967 war, not the torture, not the kangaroo court and false confessions, not the prison time.

Equally, they would disregard the commutation of the defendant's sentence by Israel, the perfectly lawful, constructive life the defendant has led since her release, her devotion to her family and her father and to his care when he was ill, and above all, the amazingly imaginative, effective, selfless community organizing she has been engaged in for the last ten years with AAAN.

Indeed, there is every reason to believe that an investigation into the work of U.S. activists supporting Justice for Palestine was the real target of the Government in this case, which included a CONTELPRO-type operation by the FBI in 2010, involving raids of people's homes and a grand jury witch hunt, which went nowhere - without even one single indictment - except to turn up Ms. Odeh's

name, and trigger efforts by the government to obtain decades-old documents from Israel.

Now, with the bodies of hundreds of innocents slaughtered in Gaza in August fresh in the minds of all who bother to care about humanity, the prosecution here demands a wholly unjustified, draconian sentence, for illegitimate political purposes, against this woman who has suffered so much, and given so much. The real motivation behind the prosecution's interest, in seeking a prison sentence well beyond what is reasonably appropriate under the sentencing factors, is not to deter others who may lie to obtain admission to the United States, but to raise the specter of Palestinian terrorism---using this 45 year old case---as a cover for and distraction from our own Government's billions of dollars of military and other material support for Israel's remorseless tyrannies against Palestine and Palestinians.

Surely the Court can see that, viewed objectively, the heated demand that defendant be treated as a "Terrorist" and punished harshly, arising as it does from mists of highly contentious history regarding the Occupation, and the Resistance, and the legalities and lack thereof in both, must pale to insignificance in comparison to the defendant's stellar, unimpeachable history of positive, constructive conduct in the 35 years since she was released, and especially the commendable record of her work in the Chicago immigrant community during the last ten years.

The Undersigned respectfully suggests to the Court that a fair and reasonable assessment of the offense, the defendant's character and role in life, her prospective loss of citizenship and ultimate banishment from her beloved

community and adopted country, over against the particulars of the case by itself, *free of politics on either side*, compels the conclusion that the offense was not venal, at all, and really—in light of the defendant’s exemplary life since—not consequential in any way that requires the sanction of (further) imprisonment; all as follows:

**II. ARGUMENT: UNDER THE STATUTORY SENTENCING FACTORS MS. ODEH SHOULD NOT BE SENTENCED TO FURTHER IMPRISONMENT**

Under 18 U.S.C. Sec. 3553 (a), the Court is required to “impose a sentence sufficient, but not greater than necessary to comply with” the enumerated purposes set forth in this statute. Further, in applying the statutory factors, the sentencing judge “must make an individualized assessment based on the facts presented” by the specific case, without giving presumptive weight to the Sentencing Guidelines. See *United States v. Gall*, 522 U.S. 38 (2007).

**A. Sentencing Guidelines**

The pre-sentence report prepared by Lee A. Sharp, calculated the defendant’s sentencing guidelines to be a total offense level of 12 and a criminal history of category One, which placed her in the Zone C range of the Sentencing Table<sup>1</sup>, with a sentencing range of 10-18 months. Before Ms. Odeh opted to exercise her constitutional right to a trial, the government had offered her a plea

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<sup>1</sup> Zone C allows for a mixed sentence of imprisonment and probation.

agreement which calculated her guideline range, with the inclusion of acceptance of responsibility, to be between 0-6 months. The agreement also stated that the government would allow Ms. Odeh 90 days to depart voluntarily, rather than be held in immigration custody awaiting deportation. (See Doc. # 144, Ex. 2)

The government now also seeks a two point enhancement under Sec 3 C 1.1, based on the assertion that Ms. Odeh willfully lied in her trial testimony. The defense objects, on grounds that such an enhancement would constitute illicit further punishment for her decision to go trial and testify in her own defense, and that, in any case, her testimony did not constitute an obstruction of justice. Section 3C 1.1 cmt. n.1, dictates that the evaluation of whether a defendant's testimony was willfully false must be considered in the light most favorable to the defendant.

Ms. Odeh was convicted of making false "no" answers on her naturalization application to questions of whether she had ever been arrested, charged, convicted or imprisoned. She testified that, since she had been living in the U.S. for nine years prior to her application, and she believed the questions referred to her time in the United States. The jury as we know rejected this explanation. They may well have been influenced by<sup>2</sup> evidence that Ms. Odeh had answered similar questions in the same way on her visa application nine years earlier, in effect, disguising her

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<sup>2</sup> While the government had an opportunity to speak to the jury after the verdict, the jury declined to speak to defense counsel.

conviction and imprisonment in Israel in 1969. Her explanation as to the earlier application was that her brother, who had lived in the United States for many years and was fluent in English, which she was not, had given her a sample completed application that she copied and submitted.<sup>3</sup> So, while the jury disbelieved Ms. Odeh's testimony about the answers and interview in 2004, taking her actions in the light most favorable to her, there is no reasonable basis for giving her a two point sentencing enhancement for obstruction of justice.

Much more to the point, in any case, the prosecution argued in a letter to the pre-sentence officer that the defendant should be treated as a "terrorist", based on the 1969 bombing conviction, illegal as it was, to rationalize a substantial upward departure from her guidelines and an extraordinary variance from the factors enumerated in Sec. 3553. Relying on this 45 year-old conviction by an Israeli military court enforcing a brutal and illegal occupation is not a legitimate basis to impose an upward departure from Ms. Odeh's guideline score. This is underscored by the fact that Ms. Odeh has consistently maintained her innocence of these

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<sup>3</sup> While it was shown that the answers on the visa application were false. That is not sufficient evidence to establish that Ms. Odeh intentionally lied in her testimony at trial about the circumstances under which her visa application was created. It was not proven that the answers on the visa application was the result independent acts by Ms. Odeh or came from her brother in the sample application he provided to his sister. To what extent, Ms. Odeh's late brother, spurred by the urgency of getting his sister to the United States in order to care for their ailing father, provided false answers to be copied, is unknowable two decades later. Indeed, if Ms. Odeh knew that her visa application and permanent resident status was obtained illegally, it would have been unlikely she would have submitted to further inquiry ten years later by applying for naturalization.



accusations, that she was tortured to confess, denied access to a lawyer for 45 days, was tried before Israeli soldiers, and that the prosecution's claims are based on unreliable and illegitimate military court documents. Further, Ms. Odeh served 10 years in prison, and then she was amnestied and her sentence was commuted.

Throughout the United States, in 2012, almost 98% of all sentences under Guideline 2L2.2, which applies to this offense, are either within the guideline range or below. Seventeen percent were sentenced below the guidelines. See Sentencing Commission, Interactive Sourcebook of Federal Sentencing Statistics, Table 50-6 (Option 4, Six Categories. (2012) <http://isb.ussc.gov> (See attached Exhibit #A, Sentencing Table)

**B. Factors to Be Considered in Imposing a Sentence.**

Under Sub-section (a) of Section 3553, the factors to be considered in imposing a sentence are, first, "the nature and circumstances of the offense and the history and characteristics of the defendant," and "(2) the need for the sentenced imposed" to reflect the seriousness of the offense and deter others from the same conduct.

**Nature and Circumstances of the Offense**

There is no evidence, or even any claim, that Ms. Odeh's effort to obtain her naturalization, or her visa and her permanent residence status, was for the purpose

of committing criminal acts in the United States; nor was she involved in the trafficking of naturalization documents. Ms. Odeh, who was living comfortably in Jordan with a good job at the time, initially came to the United States at the urging of her father and brother, in order to take care of her ailing father who was suffering from cancer. As will be explained further below, for the almost 20 years Ms. Odeh has lived in the United States, she has been free of any criminal activity whatsoever. Her life in America has consisted solely of helping her family, initially, and later serving her community.

### **History and Characteristics of the Defendant**

#### **a. Ms. Odeh's History**

Rasmieh Odeh's life mirrors the suffering and dispossession of the Palestinian people. She was born in Lifta, Palestine in 1947. The following year Palestine was arbitrarily partitioned by a United Nations vote, and despite the admonitions that no one should be forced from their land, 750,000 Palestinians were intentionally driven from their homes, almost immediately, in an act of "ethnic cleansing" under the guise of an Israeli "war of independence", which the Palestinians refer to as the "Nakba" (the catastrophe).<sup>4</sup>

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<sup>4</sup> See I. Pappé, "The Ethnic Cleansing of Palestine, One World, Oxford (2006)

Ms. Odeh described the flight of her family in her testimony at trial:

When they invaded Palestine, my family tried to find a safe space for the family after they heard the masquers, (sic) (massacres) and rapes that happened in the other Palestine villages and the cities.

So they try to walk far from the area to come back after days when the invasion finished, but for the bad luck they didn't go back.

And the found themselves in tents. We are a family, extend (sic) living together. My family found, have (sic) self living 19 people in one small tent

After we lost everything, we lost our houses, our land, our expensive things, gold, anything, anything because when they left just for day, they didn't carry anything with them, and they didn't go back there.

(Tr. Odeh testimony pp. 12-13).

The loss of all their land and possessions forced Ms. Odeh's father to leave Palestine to come to the United States to find work to support his destitute family. Following, the "Nakba" the Odeh family slowly rebuilt their life living in the West Bank of the Jordan River which was benignly administered by Jordan. After Ms. Odeh's father was injured in a factory in Detroit he could no longer work and returned to the West Bank, where the Odeh extended family was able after 5 years to leave a makeshift tent and move to a small two-room house.

In 1967, war and disaster struck again. The Israeli army invaded and occupied the entire West Bank, including the town where the Odehs were living. The soldiers were particularly brutal killing hundreds of civilians and destroying

thousands of homes. Recently disclosed censored interviews with Israeli soldiers involved in the 1967 war revealed that the invaders were told “Just kill! Kill everyone you see.”<sup>5</sup>

Ms. Odeh also testified about 1967 Israeli invasion and occupation at the trial:

[T]hey invade the West Bank, the whole West Bank and they used tanks and airplanes, and they hit everybody. . . . the tanks hit section of our house at that time so my father asked us to Jericho. If we have to die, to die together; And we walk over 40, 48 hours through the hills and through the field . . . through the deaths, we saw the whole dead bodies burned with napalm.

(Tr. Odeh testimony pp.14-15)

In 1968, a 21 year-old Ms. Odeh survived the war and occupation and was able to leave the West Bank, now filled with armed Israeli soldiers, to study at the University in Beirut, Lebanon. When she returned home for the summer, the Israelis refused to allow her to return to Beirut to continue her education. She stayed with her family and helped to take care of her father.

Between 1967 and 1970, hundreds of acts of resistance were carried out by Palestinians seeking to drive the Israeli occupiers from their land. In February of

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<sup>5</sup> See New York Times Article, “Disillusioned by War, Israeli Soldiers Muted in 1967 Are Given Fuller Voice” 1/26/75 (Attached Ex. B)

1969, Ms. Odeh was one of approximately 500 people rounded up in response to these acts of resistance, which included the bombings of a supermarket and the British consulate. As Ms. Odeh related in great detail to Dr. Mary Fabri, an expert on torture and the treatment of torture survivors, (which was set out in the affidavit filed with the court, See Doc. #45, pp3-19, 7/18/14) she was horrifically tortured from the moment of her arrest and for the following 21 days. She was subjected to electro-shock, which was observed by one of her co-defendants, who was called by the prosecutor before the grand jury that indicted her.<sup>6</sup> She also endured rape by baton, and the torture of her father and numerous other unending acts of violence and brutality.

As a result of this unspeakable torture - her testimony about which this Court found "credible"<sup>7</sup> - she ultimately confessed to involvement in the bombings of the supermarket and consulate.

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<sup>6</sup> See grand jury testimony of Samya Qasem:

"I saw her tortured. She was tortured in a room the size of this with electrical wires all around her. The first thing they did when they brought me in was show me Rasmieh, the first thing"  
Bates # 000001617

<sup>7</sup> In its Limine Order of 10/27/14, this Court stated:

The Court of course agrees that the use of torture and rape are antithetical to the concepts of fairness, due process and basic human rights. Moreover, the Court accepts as credible Defendant's claims of torture and is not unaffected by the inhumane circumstances of her detention in the West Bank. (Doc #117 at 7)

As previously noted, the Court finds Defendant's claims of torture to be credible and does not intend with the instant decision to suggest callous disregard for the inhumane and deplorable

Beginning at her military trial, Ms. Odeh has consistently maintained her innocence of these charges. She has asserted to this Court and still maintains that the entire Israeli military occupation legal system was and still is illegal under international law, as is the occupation itself. (See affidavit of Lisa Hijjar, Attached as Exhibit #D, Previously filed, Doc. # 56-1, 7/29/14) Further, she has asserted that the *Shin Bet* Israeli interrogators systematically tortured Palestinian detainees believed to be involved in resistance activities, and that the entire Israeli military occupation legal system violated U.S. principles of Due Process and fundamental fairness.

While this Court allowed the 45 year-old Israeli military court documents into evidence, pursuant to MLAT treaty with Israel, and prohibited the defense from challenging her conviction and the military court system as not relevant to the charges, the government now relies on these false charges and documents from this illegal system to brand the defendant a “terrorist”<sup>8</sup> and seek a sentence well outside her guideline factors and purposes of Sec. 3553. In a letter to the pre-sentence

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physical and emotional abuse that Defendant may have endured during her detention. (Doc #117 at 18).

<sup>8</sup> Despite the highly prejudicial nature of the use of “terrorist”, the government persists on so branding Ms. Odeh. It is well accepted however, that “one man’s terrorist is another man’s freedom fighter.” The prosecution ignores the fact that the State of Israel was founded on the terrorism of the Stern Gang and the *Irgun*, whose leader and later Prime Minister, Menachim Begun, was responsible for the bombing of the King David hotel in Jerusalem in which 91 people were killed. Even after it was a recognized state, Israeli leaders have resorted to repeated acts of terror against innocent civilians. The 1978 massacres at the Palestinian refugee camps in Lebanon of Sabra and Shitilla, in which thousands of civilians were slaughtered, under the watchful eye of Ariel Sharon, who was later elected Prime Minister, is just one of many examples. To say nothing of the repeated targeting and killing of hundreds of civilians in Gaza.

officer, the government compared her to someone involved in the Rwanda genocide who received a 10 years sentence for the same offense. The government's outrageous overreaching ignores the fact that---in addition to 35 years of peaceful, productive existence since her release--- Ms. Odeh served 10 years in an Israeli prison and was released with an order of clemency by the Israeli authorities in a prison exchange. Further, she has returned to the West Bank on numerous occasions since 1996 without raising any concerns by the Israeli government. Apparently, the prosecution here seeks to punish her for her purported 45 year-old acts of resistance, from which even the government of Israel has moved on.

Released from prison in 1979 at the age of 32, Ms. Odeh began to slowly rebuild her shattered life. She lived in Lebanon from 1970 -1983 assisting displaced Palestinians living in refugee camps to obtain U.N. humanitarian aid. She continued this work in Amman Jordan with Palestinian refugees from 1983-1995, as well as working selling newspaper advertisements and returning to the *Ali Ahliyya* University to continue her education.

She came to the United States in 1995 to help take care of her father who was suffering from cancer. During this period she also completed her undergraduate studies through the Al Quds University in the West Bank and obtained a bachelor's degree in law in 2002.

**b. Characteristics of Defendant: Ms. Odeh's Present Work and Contributions to Her Community.**

As attested to in the numerous letters attached to this submission, Ms. Odeh has been responsible for ground-breaking work with immigrant woman as part of the Arab American Action Network (AAAN), and she is deeply admired by a broad cross-section of the people who she has worked with and worked for.

With this memorandum, Ms. Odeh submits over 70 letters from religious leaders, university professors, human rights attorneys, community activists and people who have worked with her, attesting to her extraordinary and original work with Arab immigrant women. (See generally, Ex. C-1-71) While Ms. Odeh is confident that this Court will review all the submitted letters, counsel wishes to quote from a few of them.

Marquette Professor Louise Cainkar, who was first introduced to Ms. Odeh in the mid 1980's in Jordan, states:

Rasmea Odeh is a hard working, passionate woman whose life goals include improving U.S. society to be more just, and improving conditions of women and youth who live within. I can tell you from all my research that the discrimination that Arab women and children [and men] endure make for a life that is not easy. For low-income families, the racism they face from others is compounded by a lack of economic means. These are the people that Rasmea, is building, strengthening for their own benefit and for the benefit of our society at large. In light of her personal history and these facts of life in the Arab American community, I think Rasmea's sentence should be community service.



Rasmea is a noble leader and someone I admire very much. I often wish I had many of her talents. (Ex. C-7)

Writing on Behalf of the *Arab Jewish Partnership for Peace and Justice in the Middle East*, attorney Lisa Kosowski, who has known Ms. Odeh for 11 years writes:

Rasmea is a warm, kind and emphatic person. She lives very modestly and devotes her time and energy to helping immigrant women in the Chicago Arab community face the challenges of adopting to a new country and culture. Before Rasmea created the Arab Women's Committee, there were no social service agencies that could address the needs of this population due to language and cultural barriers. Rasmea bridged that gap so women could have access to services such as counseling and legal assistance in cases of divorce and domestic violence. Rasmea is the backbone of a community that loves her as much as she loves them. (Ex. C-10)

Nadia Tonova, the Director of the National Network for Arab American Communities (NNAAC) based in Dearborn Michigan, writes:

Over the course of the past eight years doing empowerment work and capacity building with Arab-American organizations across this country, I have been inspired by the work of Rasmea, specifically with her effective programming for women victims of domestic violence and immigrant women who find themselves alienated and marginalized in a new country. Rasmea has made such a tremendous impact on thousands of U.S. women and as an elder in the community has inspired many young women to follow in her path. We have looked at some of her programming as models for other organizations.

Rasmea has never been less than an inspirational, motivational, positive-thinking award winning leader of Chicago's immigrant community. (Ex. C-2)

Rev. Dr. Donald E. Wagner writes:

Rasmea is a woman of deep compassion and sacrificial service among predominantly poor refugee women on the southwest side of Chicago. I first met her approximately ten years ago when I brought one of my university classes to meet Rasmea and other staff at the Arab American Action Network. My class was studying peace and conflict transformation and AAAN has been a model of peacebuilding in Chicago for several decades. My students were touched by Rasmea's work with women and heard similar stories from other staff. Since that initial meeting I have met Rasmea on several occasions and can testify that her reputation is legendary. I join Rasmea's community in asking you to allow her to continue this vocation of healing that she does so well. (Exhibit C-8)

Bishop Thomas J. Gumbleton of Detroit writes requesting leniency for

Rasmea:

Rasmea is an award winning leader of Chicago's immigrant community. She has dedicated most of her life with serving refugees. In Chicago, she built the Arab Women's Committee that now has over 600 members. Because of her work immigrant and refugee women from Iraq, Palestine, Yemen, and beyond now have a place to seek support, find community and become productive members of our society. As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health, the isolation she endured while incarcerated was a great hardship and may have rigged Post Traumatic Stress Disorder (PTSD).

As a 67-year old woman, her health suffered under the damp and uncomfortable conditions in the St. Clair County Jail, which also lacked medical services and accommodations for senior citizens.

I am asking for compassion in her sentencing. Rasmea has much to offer her community. Since there is a possibility of her conviction being overturned

on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of refugee women. (Ex. C-3)

From her family, her three nephews write the following:

Rasmea is more than just a beloved aunt; we feel as if she is our mother. She has always stood beside us, especially during difficult times in Jordan, Palestine and the U.S., when our mother, her sister, was diagnosed with breast cancer, blood clots, diabetes, high blood pressure, and much more. At the same time our father passed away suddenly after the doctors discovered that he had advanced stage leukemia. Since then, Aunt Rasmea has played the role of mother and father in our lives. She is our main supporter, the person who protects us from negative influences, and the one who takes care of all our needs. She has always done everything in her power to help us become successful young adults. (Ex. C-67)

### **Letters from the Woman of the Arab Women's Committee**

The following excerpts from three letters from women who were part of the Arab Women's created by Rasmea captures the importance and significance of her work. Mariam Obaid writes,

I never went to school in my life. I don't know how to read and write, even in my native language Arabic. I used by fingerprint as a signature for years. I never left the house alone. I was dependent on my father, and then after marriage my husband. They both always spoke on my behalf. I arrived here with my husband 25 years ago, spending the first 20 years in California, where all I did was cook and clean, rarely leaving the house. I lived in panic and fear all the time. I never even opened the door when the bell rang.

Five years ago we moved to Illinois, and I met Rasma three years ago. She encouraged me to participate in the Arab American Action Network (AAAN) English as a Second Language classes and other activities of the AWC. Rasma provides us a safe place where we can discuss the difficulties, contradictions and challenges we face in this country. I was encouraged to express my feelings and thoughts, and to learn how to reduce the cultural gap between mothers and their American-born children. . . .

Rasma changed my life and the lives of hundreds of other women in the committee. She pulled me from the darkness to the light, bringing meaning to my life. She has a great sincerity and loyalty to her community and beyond. She is always prepared to help anyone who needs it. (Ex. C-68)

Maysoon Gharbieh writes,

Rasma provided a safe environment and family atmosphere that is based on mutual understanding and respect, helped me and others to protect our children from the risk of joining gangs or other dangerous activities and helped us to better communicate with our children. She structured AWC to provide leadership development for us, as well as promoting self-reliance and self-esteem. She helped us understand how to work with our children to help reduce the cultural gap between immigrant parents on one hand and the American-born children on the other. All of this is training for us to become active and productive citizens of our new country.

Rasma is a valuable and lovely icon for us and for the entire community. She works without reward or personal profit. All she cares about is supporting and protecting us and our families. Her ultimate goal is to help develop families that are educated, active, and effective in contributing to keeping the community and the country safe for all who live here. (Ex. C-69)

Halima Al-Rasdeh writes,

I am now over 40 years old and a single mother to 5 children after my husband passed away from a heart attack. When I first came to the U.S. over 20 years ago with my husband, I felt miserable and lonely; I didn't have family or friends. Everything around me was strange; the city, the people, the culture and the language. I couldn't do anything for myself. Even when my first child was born, I couldn't take him to the doctor until my husband got home.

When I met Rasmae, everything in my life changed. She offered her support to help other women and identify our needs. She provided support and assistance to help break our isolation, and to become independent, active members in the community and to society as a whole. . . .

With Rasmae, I have been given "wings" to make myself be heard. I gained strength as a result, became a new person who cared so much for health issues, like breast cancer, heart disease and emotional issues as well. In addition, I learned about the community and city, and how we have an important voice of change in society. (Ex. C-70)

In addition to her full-time work in the community, Rasmae also found the time, taking classes at night, to obtain a master's degree in 2012 in criminal justice at Governor State University, in Illinois. As Professor Cainkar writes, "I clearly recall watching her writing papers late in the evening, after her long day's work was done."

**c. The need for the sentence imposed.**

**1. Seriousness of the Offense.**

Considering her age<sup>9</sup>, and physical and mental health<sup>10</sup>, her exemplary history in the United States, her service to her community, the loss of her citizenship, and prospective deportation, there is no reasonable justification for sending Ms. Odeh to federal prison. If she loses her citizenship and is banished from her home, and the community in which she is so well-loved and admired, the defendant will already have lost so much, that further punishment would be altogether unwarranted and unproductive.

**Ms. Odeh's Post-Traumatic Stress Disorder**

As set out in the attached addendum to her original affidavit, Dr. Fabri, has interviewed Ms. Odeh after she was released on bail, following her five week imprisonment in the St. Clair County Jail, and opines that this incarceration

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<sup>9</sup> Sec 5H1.1 Age (Policy Statement) states:

Age (including youth) may be relevant in determining whether a departure is warranted. If considerations based on age, individually or in combination with other offender characteristics, are present in an unusual degree and distinguish the case from the typical cases covered by the guidelines. Age may be reason to depart downward in a case in which the defendant is elderly and infirm and where a form of punishment such as home confinement might be equally efficient and less costly than incarceration

<sup>10</sup> See 5H1.3 Mental and Emotional Conditions (Policy Statement) states:

Mental and emotional conditions may be relevant in determining whether a departure is warranted, if such conditions, individually with other offender characteristics, are present to an unusual degree and distinguish the case from typical cases covered by the guidelines.

exacerbated her PTSD condition and that further incarceration would have a further deleterious effect on her health and well-being.

Dr. Fabri states:

Ms. Odeh continues to suffer from PTSD symptoms related to a history of trauma that includes forced displacement of family as a child, exposure to conditions of war and violence, arrest, interrogation, torture, and imprisonment in 1969 in Israel.

The recent arrest, trial, conviction, and imprisonment related to charges of providing false information on her naturalization application has resulted in a reactivation of PTSD symptoms. As previously stated, this is consistent with the findings of longitudinal studies in the regarding trajectories of PTSD and reactivation of symptoms over the lifetime. (Monica, Caridad&Massagli, 2007; Solomon & Mikulincer, 2006; Marshall, Schell, et al, 2005; Eisenman, Gelberg, et al, 2003; Silove, Steel, et al, 2002).

PTSD is an enduring condition that has profound implications for emotional and physical health. Reactivation of symptoms result in severe stress reactions in the body and has been demonstrated in multiple studies that PTSD contributes to a higher prevalence of mental illness, hypertension, heart disease, and diabetes. [Ahmadi, Hajsageghi, et al, 2011; McFarlane, 2010; Kinzie, Riley, et al, 2008].

It is this evaluator's opinion, to a reasonable psychological certainty, that someone with chronic PTSD has a higher risk to develop serious health conditions that impact psychological and physical health as they age. Ms. Odeh falls in this category as a 67 year-old woman [DOB: 05/22/1947] with a history of multiple traumas and a diagnosis of chronic PTSD.

(See Ex. # D); See also letter from Ms. Odeh's primary care physician, Dr.

Namratha R. Kandula, who also determined that it was "evident that Ms. Odeh has

posttraumatic stress disorder” which was “negatively affected” her emotional and physical health by this case. (Ex. # F)

Similarly, Professor of Psychiatry, Jess Ghannam, who has worked with torture survivors from all over the world including the Middle East writes:

It is well known within the community that Rasmieh has severe and significant posttraumatic stress disorder. This disorder, she has had even since she was in her 20's, has been a life-long chronic illness, which she has endured and suffered throughout the bulk of her adult life.

The Court proceedings as well as her recent time in jail have exacerbated her posttraumatic stress disorder, causing her to re-experience these symptom including ongoing nightmares, severe anxiety, depression and decline in her psychological and behavioral health. (Ex. C-26)

## **2. Deterrence**

The government argues that a substantial prison sentence, even the 10 year maximum, is required as a deterrent to other “terrorists,” who might consider lying to obtain naturalization. But this thinking is flawed on many levels. Ms. Odeh is not a terrorist. Even if she had been involved in the bombings she was accused of--- where she has consistently denied any participation--- resisting a brutal and illegal military occupation is a far cry from the actions of those who were involved in genocide, mass murder and other atrocities by State sanctioned agents. Further, she was severely punished for her purported resistance, first horrifically tortured and then imprisoned for 10 years in an Israeli prison.



What happened 45 years ago is apparently not a continuing issue with the Israeli government. After the Oslo Accords and the creation of the Palestinian Authority, Ms. Odeh was allowed to return to the West Bank, and has visited there almost every year since 1996, without any problems. It is the Assistant U.S. Attorney, and his partners from Homeland Security, who are using the terrorist label to seek harsh punishment for Ms. Odeh, to curry favor with their American Zionist constituents and obfuscate 67 years of Israeli terrorism.

To make an example of Ms. Odeh by sending her to prison, followed by banishing her from her community and adopted country, under the speculative theory that this will deter others from covering up their criminal history to obtain U.S. citizenship, is unfair and illogical. No “terrorist”, or anyone else with a criminal background who wants to come to the U.S., will be affected in anyway by what happens to Ms. Odeh. That is elementary.

It makes no sense to expend resources to keep Ms. Odeh in prison in the United States when she poses no threat to anyone, and will only delay her removal from the country which has been the purported goal of the prosecution from the beginning.

**3. Factors (C) and (D) are Not Applicable to the Defendant.**

The government does not claim that Ms. Odeh poses any danger to the public, nor could they, in light of her record since her release from an Israeli prison in 1979; and this Court readily so found in considering the Motion to Revoke Bail at the end of the trial. In addition, the defendant who has Master's degree is not in need of education or vocational training, medical care or other correctional treatment the Bureau of Prisons can provide. Ms. Odeh does have a serious ongoing dental problem which requires a 6 month course of treatment involving fabrication and installation of implants (see Dentist's Letter, Exhibit G), which also militates against further incarceration.

### **CONCLUSION**

Ms. Odeh is asking this Court to sentence her as she is today, 20 years after she came to America to help her family, and in light of the last ten years in which she has built a life of devoted service to her community. She has accomplished so much while contending with a debilitating disorder resulting from the dispossession, imprisonment and torture she suffered in Israel, and now faces yet another disastrous, upheaval and destruction of her life in America. This is certainly more than enough of the price that should be exacted, from a woman who in her dedicated work has more than redeemed any real transgression involved in coming to America as an immigrant and becoming a naturalized citizen.

**WHEREFORE**, the defendant respectfully asks the Court to find, on the basis of the record before it, that no term of imprisonment is appropriate under the sentencing factors and in the interests of justice. In the alternative, if some prison term is deemed essential, the defendant asks that it be limited to the time she has already served after being jailed at the end of the trial.

The defendant further prays that any additional sentence consist of a term of probation or other supervision by the Court, premised on her continuing her community service activities, which will now include preparing for her looming absence.

In the event the Court sees fit to impose further prison time, the defendant requests that the sentence be stayed, and that her bond be allowed to stand, pending appeal, and counsel will submit a separate pleading with this request if that becomes an issue. Defendant prays also for such other and further relief as may be just and appropriate.

Dated: February 25, 2014

/s/ Michael E. Deutsch

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313- 567-8170

Local Counsel

**CERTIFICATE OF SERVICE**

Michael E. Deutsch, hereby certifies that he has filed the above Memorandum to the parties of record through the ECF system on February 25, 2015.

/s/ Michael E. Deutsch

Michael E. Deutsch  
People's Law Office  
1180 N. Milwaukee Ave.  
Chicago IL, 60642

## INDEX OF EXHIBITS

EXHIBIT #A	SENTENCING TABLE
EXHIBIT #B	NEW YORK TIMES ARTICLE
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EXHIBIT #D	AFFIDAVIT OF DR. LISA HAJJAR
EXHIBIT #E	ADDENDUM BY DR. MARY FABRI
EXHIBIT #F	LETTER FROM DR. KANDULA
EXHIBIT #G	LETTER FROM DR. ELMOSA

**SENTENCE LENGTH OF OFFENDERS SENTENCED UNDER IMMIGRATION GUIDELINES  
BY SENTENCE RELATIVE TO THE GUIDELINE RANGE (OPTION 4: SIX CATEGORIES)<sup>1</sup>  
Fiscal Year: 2012**

SENTENCING GUIDELINE	TOTAL			WITHIN RANGE			UPWARD DEPARTURES <sup>2</sup>			OTHERWISE ABOVE RANGE <sup>2</sup>			GOV'T SPONSORED BELOW RANGE			DOWNWARD DEPARTURES <sup>3</sup>			OTHERWISE BELOW RANGE <sup>3</sup>		
	N	Mean	Med	N	Mean	Med	N	Mean	Med	N	Mean	Med	N	Mean	Med	N	Mean	Med	N	Mean	Med
<b>TOTAL<sup>4</sup></b>	<b>82,097</b>	<b>45</b>	<b>24</b>	<b>42,797</b>	<b>45</b>	<b>21</b>	<b>578</b>	<b>85</b>	<b>57</b>	<b>1,053</b>	<b>85</b>	<b>60</b>	<b>22,962</b>	<b>39</b>	<b>24</b>	<b>2,705</b>	<b>41</b>	<b>24</b>	<b>12,002</b>	<b>48</b>	<b>24</b>
<b>TOTAL IMMIGRATION</b>	<b>23,229</b>	<b>18</b>	<b>12</b>	<b>12,752</b>	<b>16</b>	<b>10</b>	<b>194</b>	<b>30</b>	<b>24</b>	<b>271</b>	<b>32</b>	<b>24</b>	<b>7,288</b>	<b>19</b>	<b>15</b>	<b>842</b>	<b>25</b>	<b>24</b>	<b>1,882</b>	<b>20</b>	<b>18</b>
§2L1.1	2,273	17	12	1,013	21	16	89	28	24	14	81	45	920	11	9	32	11	4	205	12	9
§2L1.2	19,454	19	13	10,599	17	10	96	31	24	227	30	24	6,242	20	18	790	26	24	1,500	23	22
§2L2.1	304	15	12	176	17	12	4	50	50	8	44	33	59	8	0	2	--	--	55	11	8
§2L2.2	1,198	5	3	964	5	3	5	17	15	22	20	14	67	7	6	18	4	1	122	6	4

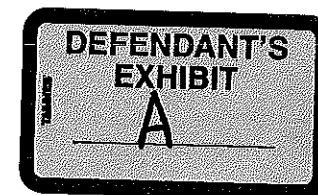
<sup>1</sup> This table only includes USSG Chapter Two, Part L (Immigration) cases sentenced under the following guidelines: §§2L1.1 (Alien Smuggling), 2L1.2 (Unlawful Entering or Remaining in the United States), 2L2.1 (Trafficking In Immigration Documents, or Making False or Fraudulent Immigration Statements), 2L2.2 (Acquiring Fraudulent Immigration Documents). Descriptions of variables used in this table are provided in Appendix A.

<sup>2</sup> See Tables 24-24B for a list of departure reasons comprising these categories.

<sup>3</sup> See Tables 25-25B for a list of departure reasons comprising these categories.

<sup>4</sup> Of the 84,173 cases, 2,076 were excluded due to one or more of the following reasons: missing information from the submitted documents that prevented the comparison of the sentence and the guideline range (1,499), or missing sentencing information (726). Of these 2,076 cases, 21 were sentenced under one of the four immigration guidelines listed in this table.

SOURCE: This was produced using the U.S. Sentencing Commission's Interactive Sourcebook (isb.uscc.gov) using the Commission's fiscal year 2012 Datafile, USSCFY2012.



New York Times

1/26/15

# Disillusioned by War, Israeli Soldiers Muted in 1967 Are Given Fuller Voice

By JODI RUDOREN

TEL AVIV — A young Israeli soldier, fresh from the front, bluntly recounts the orders from above. "They never said, 'Leave no one alive, but they said, 'Show no mercy,'" he explains. "The brigade commander said to kill as many as possible."

Another recalls encountering Arabs on rooftops. "They're civilians — should I kill them or not?" he asks himself. "I didn't even think about it. Just kill! Kill everyone you see." And a third makes it personal: "All of us — Avinoam, Zvika, Yitzhak — we're not murderers. In the war, we all became murderers."

The wrenching, taped testimony is not from last summer's bloody battle in the Gaza Strip but from the 1967 war, when Israel started out fighting Egypt, Jordan and Syria for

its very survival and ended up seizing the West Bank, Gaza, the Sinai Peninsula and parts of the Golan Heights. As the International Criminal Court considers a war crimes investigation in the recent conflict, a new documentary film is showcasing previously unaired admissions of brutal behavior by an earlier generation.

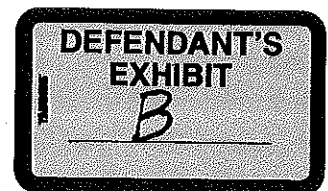
The film, "Censored Voices," premiered at the Sundance Film Festival on Saturday, the latest in a series of movies by leftist Israeli filmmakers who have won awards abroad by presenting harsh looks at their own society. Based on interviews that the military heavily edited at the time, it includes accounts of Israelis summarily executing prisoners and evacuating Arab villages in a manner that one fighter likened to the Nazis' treatment of European Jews.

The director, Mir Loushy, said in an interview that she was trying to revamp the prevailing Israeli narrative of triumph in 1967 in light of all that has happened since, and that the film "is very relevant for today."

But with Israel increasingly in a defensive crouch on the international stage, the film raises concerns that, viewed without consideration for the existential threat Israel faced at the time, it could become catnip for contemporary critics.

"People abroad who don't remember the way we do the circumstances of the Six-Day War will turn this into one more indictment of Israel," said Yossi Klein Halevi, whose 2013 book, "Like Dreamers," followed the lives of a group of 1967 veterans. "If there were isolated acts of abuse by our soldiers, that should

Continued on Page A9





# Soldiers of 1967 Are Given Fuller Voice

From Page A4

not become the narrative about what the Six-Day War was about. Many of us here are, frankly, sick and tired of the blame-Israel-first narrative."

Asked to respond to the film, Lt. Col. Peter Lerner of the Israel Defense Forces said it was "representative of Israel's vibrant democracy, where everything can be and is openly discussed," but not particularly pertinent to current debates over military conduct. While 1967 was a war between sovereign states, Colonel Lerner noted, today Israel faces "belligerent nonstate or semistate" actors with weapons "dispersed within the civilian arena."

"Any attempt to draw similarities between the two," he said in an email, "is weak and nonrepresentative of how warfare has developed, how the battlefield has evolved and how today terrorism takes precedence over traditional warfare."

The 84-minute film had a budget under \$1 million, financed mainly by Israeli and European broadcasters and the American documentary producer Impact Partners. Interspersing the 1967 interviews with archival footage from the war and ABC News's coverage of it, it does make clear the imminent threat to Israel — and then the stunning turnabout that military historians have long considered a marvel.

Beyond the accounts of killing prisoners and civilians, perhaps the most striking element of the film is that within a week or two of the war's end, these soldiers — from Israel's socialist kibbutz movement — questioned its wisdom.

"I think that in the next round the Arabs' hatred towards us will be much more serious and profound," one says. Already ambivalent about the occupation of Palestinian territory, another worries, "Not only did this war not solve the state's problems, but it complicated them in a way that'll be very hard to solve."

As Ms. Loushy put it, "This is the story of men who went out to war feeling like they had to defend their life, and they were right, of course, but they went out in one position and came back as conquerors."

"If those voices had been published in 1967," she said, "maybe

Irit Pazner Garshowitz contributed reporting.



Mor Loushy, director of "Censored Voices," a new film about the 1967 war.

our reality here would be different."

Some of the voices were published at the time in "A Conversation With Warriors," a collection edited by Avraham Shapira that sold a stunning 120,000 copies in Israel. (The English-language version is called "The Seventh Day.") Mr. Halevi said its publication "was the moment when part of Israeli society started sobering up from the euphoria."

When Ms. Loushy, 32, tripped

## A film is showcasing previously unaired accounts of brutal experiences.

across a copy doing research for a history paper, she was riveted by how different its tone was from the 1967 story she had learned in school. She cajoled Mr. Shapira, an aging kibbutznik and philosophy professor, to share the original audiotaped interviews that he had denied to legions of journalists and historians.

"If you listen — not hearing but listening — to the recordings, there is a symphony of sounds: There are screams, crying, real weeping," Mr. Shapira said in an interview. "They anticipated what can happen if we'll not work immediately for peace, practically to return back all the occupied territories. They express it as an

inner feeling, no politics."

He said current soldiers had told him that they found in these old interviews "a deep, personal expression of their own moral and human dilemmas."

Ms. Loushy, whose previous film, "Israel Ltd.," attempted to unmask Zionist propaganda tours, listened to 200 hours of tapes over eight months, much of which the censors had blocked from publication in the book. She was deep into the project before she discovered that the film, too, would be subject to censorship, she said.

Israel forbids the filmmakers to reveal how much they were forced to change, and the military censor's office refused to discuss it.

"For us as a society to mend and to improve ourselves, we can't censor," Ms. Loushy said. "I think it's important that we look the truth in the eyes."

The film's star is the original reel-to-reel tape recorder that Mr. Shapira bought in 1967. It replays the interviews as the soldiers — now graying, wrinkled men — sit alongside, sometimes closing their eyes or cringing a bit. Only in the final few minutes do some of them speak, briefly. One says he has become "less Zionist, less patriotic, less of a believer," and another says, "I'm much more right wing than before."

Pinchas Leviatan, 73, a retired horticulturalist and teacher, said in an interview that when Ms. Loushy had come to his home and played the tape, he had not recognized the voice, "but when I heard what I said, I was sure that it was me." He had been telling the same stories to students for years.

In the film, Mr. Leviatan talks of being emotionally broken by seeing the humiliation of Egyptian soldiers after the fighting, when they "came with canteens filled with urine" and, upon being given water, "threw up on our feet and kissed us." He is one of the Israeli soldiers whose views have changed with time.

"I was convinced that the peace is coming, and maybe after the Six-Day War I was hoping that it's going to happen," he said in the interview. "I was very naive. I participated in another five wars as a commanding officer. The fact is that during the years, I lost my belief in the possibility of getting any solution in the area."

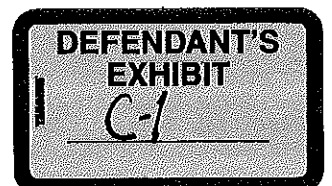
DEFENDANT'S  
EXHIBIT

B

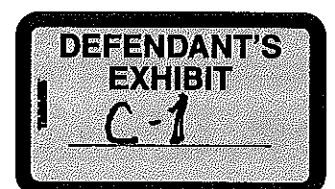
**EXHIBIT # C -1**

**INDEX OF LETTERS SEEKING LENIENCY**

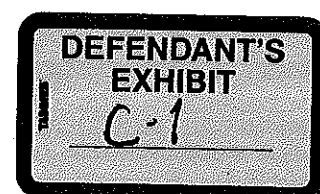
- C-2 Nadia Tonova, Director, National Network of Arab-American Communities, Dearborn, Michigan.
- C-3 Bishop Thomas J. Gumbleton, Detroit, Michigan.
- C-4 Samer E. Khalaf, Esq., National President, *Arab American Anti - Discrimination Committee*, Detroit, Michigan
- C-5 Osama Siblani, Publisher, *Arab American News*, Detroit Michigan
- C-6 Fr. Robert Bossie, SCJ, Priests of the Sacred Heart, Chicago, Illinois.
- C-7 Professor Louise Cainkar, Ph.D., Marquette University.
- C-8 Rev. Dr. Donald F. Wagner, National Program Director, *Friends of Sabeel-North America*.
- C-9 Douglas E. Wingeier, PhD, Emeritus Professor, Garrett-Evangelical Seminary, Evanston, Illinois.
- C-10` Attorney Lisa A. Kosowski, *Arab Jewish Partnership for Peace and Justice*, Chicago, Illinois.
- C-11 Jordan Elgrably, Executive Director, Levantine Cultural Center, Los Angeles, California.
- C-12 Junaid Rana, Associate Professor, University of Illinois at Champaign, Urbana.
- C-13 Liz Deligio, Justice Co-coordinator, *8th Day Center for Justice*, Chicago, Illinois.



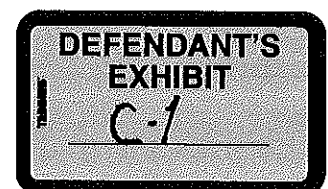
- C-14 Alie Kabba, Executive Director, United African Organization, Chicago, Illinois.
- C-15 Patricia R. Johnson, Canon Missioner, Washington National Cathedral.
- C-16 The Reverend, Nancy S. Hildbrand, Associate Rector, St. David's Episcopal Church, The Diocese of Washington.
- C-17 Peter H.S. Sporn, M.D. Professor of Medicine, Northwestern University, Feinberg School of Medicine, Chicago, Illinois.
- C-18 Rev. Michael L. Pflieger, Senior Pastor, Faith Community of St. Sabina, Chicago, Illinois.
- C-19 Mark Peters, Director of Justice, Peace and Reconciliation, Priests of the Sacred Heart, Hales Corners, Wisconsin.
- C-20 Daryle Brown, Executive Director, Multimedia Communication, Trinity United Church Christ, Chicago, Illinois.
- C-21 Dale Asis, Former Executive Director, Coalition of African, Arab, Asian, European and Latino Immigrants of Illinois, Chicago, Illinois.
- C-22 Attorney Shani Mandisa Moore, Woman's Health Law Initiative, New Orleans, La.
- C-23 Rabbi Brent Rosen, Regional Director, American Friends Service Committee, Chicago, Illinois.
- C-24 Professor, Anna Guevarra, Asian American Studies, University of Illinois, Chicago.
- C-25 Frank Chapman, Chicago Alliance Against Racist and Political Repression.
- C-26 Jess Ghannam, PhD., Professor of Psychiatry, University of California, San Francisco.
- C-27 Tracy Benson, Regional Manager, Community Justice Network for Youth, Haywood Burns Institute.



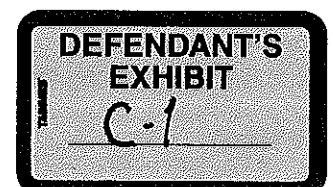
- C-28 Lynn Pollack, *Jewish Voice for Peace-Chicago*.
- C-29 Lynette Jackson, Ph.D., Associate Professor, Gender and Woman Studies, University of Illinois at Chicago.
- C-30 Ahmed Rehab, Executive Director, Counsel on American Islamic Relations, Chicago, Illinois.
- C-31 Richard Feldman, *James & Grace Lee Boggs Center to Nurture Community Leadership*, Detroit, Michigan.
- C-32 Abder Ghoulch, Chicago Board Member, *Arab-American Anti-Discrimination Committee*.
- C-33 Professor Loren D. Lybarger, Associate Professor of Classics and World Religions, Ohio, University.
- C-34 Attorney, Lina Baroudi, Arab American Legal Services, San Francisco, California.
- C-35 Kalimah Johnson, LMSW, ACSW, LCW, Sasha Center, Detroit Michigan.
- C-36 Bro. Brian McLaughlin, SVD, Washington, D.C.
- C-37 Rebeccah A. Sanders, Former Executive Director, Chicago Cultural Alliance.
- C-38 Naomi Wallace, Playwright and Screenwriter, New York, N.Y.
- C-39 Nida Sahouri, Chicago Chairwoman, American Muslims for Palestine.
- C-40 Sara Kershner, California Coalition for Women Prisoners.
- C-41 Lawrence Benito, Executive Director, Illinois Coalition for Immigrant and Refugee Rights.
- C-42 Khalil Meek, National Executive Director, Muslim Legal Fund of America, Richardson, Texas.
- C-43 Robert Clarke, President, Chicago Committee to Defend the Bill of Rights.



- C-44 Caren Levy-Van Slyke, Chair, *Committee for a Just Peace in Israel and Palestine*, Oak Park, Illinois.
- C-45 Imam Jamal Said, Principal Imam and Director, Mosque Foundation, Bridgeview, Illinois.
- C-46 Attorney, Standish F. Willis, Chicago, Illinois.
- C-47 Matt Greenberg-Jaeckle, Co-founder, *Southside Together Organizing for Power*, Chicago, Illinois.
- C-48 Sue Udry, Executive Director, *Defending Dissent*, Takoma Park, Maryland.
- C-49 Wayne Wittman, Retiree Council Area Vice President, Minnesota AFL-CIO.
- C-50 Fahd Ahmed, Acting Director, *DRUM*, Jackson, Heights, N.Y.
- C-51 Attorney, Daniel L. Meyers, New York, N.Y.
- C-52 Attorney, Kalman D. Resnick, Chicago, Illinois.
- C-53 Professor Lisa Hajjar, Department of Sociology, University of California, Santa Barbara.
- C-53(a) Stephen F. Downs, Executive Director of the National Coalition to Protect Civil Freedoms, Chief Counsel to the New York State Commission on Judicial Conduct.
- C-54 Marilyn Katz, President, MK Communications, Chicago, Illinois.
- C-55 Mary H. Smarr, Chair, *Joining Hands for Justice in Israel and Palestine*, Stone Mountain, Ga.
- C-56 Alexandra Halaby, North American Spokesperson for International Middle East Media Center.
- C-57 Stan West, Columnist, *Wednesday Journal*, Oak Park, Illinois.
- C-58 Joe Lombardo, and Marilyn Levin, Co-coordinators, *United Antiwar Coalition*.



- C-59 Steering Committee, *National Students for Justice in Palestine*.
- C-60 Cherrene Horazuk, President, AFSCME 380G, Patrick Kearns, RN, President AFGE 2547, Mark Froemke, President, West Area Labor Council, MN AFL-CIO, Joe Burns, Labor Negotiator and Author, David Riehle, Local Chairman, United Transportation Union 650 (retired), Gladys McKenzie, AFSCME Council Field Representative (retired).
- C-61 Toussaint Losier, PhD, Community Organizer, Chicago, Illinois.
- C-62 Palestinian Youth Movement, White Plains, N.Y.
- C-63 Professor, Jigna Desai, PhD, Chair of Department of Gender, Women and Sexual Studies, University of Minnesota.
- C-64 Jane Ramsey, President, Just Ventures, LLC, Chicago, Illinois.
- C-65 Hedy Epstein, St. Louis, Mo.
- C-66 Attorney, Melinda Power, West Town Law Office, Chicago
- C-67 Letter from Nephews, Khalid Mashal, Osama Mashal and Mohammad Mashal.
- C-68 Mariam Obaid, Member of Arab Women's Committee.
- C-69 Maysoon Gharbieh, Member of Arab Women's Committee.
- C-70 Halima Al-Rasdeh, Member of Arab Women's Committee.
- C-71 Beth E. Ritchie, PhD, Professor and Author, Chicago, Illinois.
- C-72 Attorney John F. Royal, President, Detroit and Michigan Chapter, National Lawyers Guild.



2/3/2015

Honorable Judge Gershwin Drain,

My name is Nadia Tordova and I am the Director of the National Network for Arab American Communities (NNAAC) based in Dearborn, Michigan. NNAAC is a consortium of 23 independent nonprofits in 11 states serving the Arab American community. I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a community leader and senior staff member at a NNAAC member organization, the Arab American Action Network in Chicago.

Over the course of the past eight years doing empowerment and capacity building work with Arab American organizations across the country, I have been inspired by the work of Rasmea, specifically with her effective programming for women victims of domestic violence and immigrant women who find themselves alienated and marginalized in a new country. Rasmea has made such a tremendous impact on thousands of U.S. women, and as an elder in the community has inspired many young women to follow in her path. We have looked at some of her programming as models for other organizations.

Rasmea has never been less than an inspirational, motivational, positive-thinking, award-winning leader of Chicago's immigrant community. She has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, many immigrant and refugee women have become engaged, empowered, and productive citizens of the U.S.

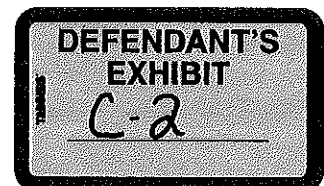
It would be a great hardship not only for Rasmea, but for the Arab American community nationally, if Rasmea would be stripped of her citizenship, imprisoned and/or deported. Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

I hope you take my request for leniency for Rasmea Odeh into great consideration.

Respectfully yours,

*Nadia Tordova*

Nadia Tordova  
[ntonova@accesscommunity.org](mailto:ntonova@accesscommunity.org)  
734-818-0281



Via e-mail: Justice4rasmea@uspcn.org

February 2, 2015

Dear Judge Gershwin Drain:

I am writing to request leniency for Rasmea Odeh when she is sentenced in your court on March 10.

Rasmea is an award-winning leader of Chicago's immigrant community. She has dedicated most of her life to serving refugees. In Chicago she built the Arab Women's Committee that now has over 600 members. Because of her work, immigrant and refugee women from Iraq, Palestine, Yemin and beyond, now have a place to seek support, find community and become productive members of our society. As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have triggered her Post Traumatic Stress Disorder (PTSD).

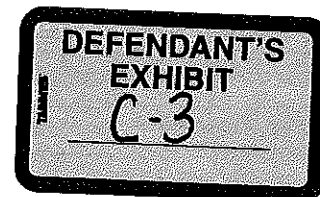
As a 67-year old woman, her health suffered under the damp and uncomfortable conditions in the St. Clair County Jail, which also lacked medical services and accommodations for senior citizens.

In November of last year, Rasmea was convicted of Unlawful Procurement of Naturalization. I am asking for compassion in her sentencing. Rasmea has much more to offer her community. Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of refugee women.

Thank you in advance for your thoughtful consideration of this request.

Sincerely,

Bishop Thomas J. Gumbleton  
1616 Bagley  
Detroit, MI 48216







American-Arab Anti-Discrimination Committee

February 6, 2015

**VIA FIRST CLASS MAIL**

Honorable Judge Gershwin Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

***Re: Request for leniency in the sentencing of Rasmia Odeh***

Honorable Judge Gershwin Drain:

I am writing on behalf of the American-Arab Anti-Discrimination Committee (ADC), the largest Arab-American civil rights organization in the United States. ADC has protected the Arab-American community for thirty five years against discrimination, defamation, racism, and stereotyping. The purpose of this letter is to request your leniency in the sentencing of Ms. Rasmia Odeh, which is scheduled for the 12<sup>th</sup> of March 2015.

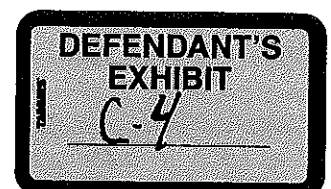
Ms. Odeh has demonstrated herself to be an exemplary citizen and a well-respected community leader in Chicago, Illinois. She has dedicated over 40 years of her life to serving the community. Through her position as the Associate Director of the Arab American Action Network, Ms. Odeh has worked on issues pertaining to women, addressing matters ranging from promoting literacy and civic engagement, to domestic violence and discrimination. In her leadership position, Ms. Odeh provided regular programming to help women learn English, and get a better understanding of the culture in America so they can easily assimilate into American society..

Additionally, as a survivor of torture, engagement with society is critical to Ms. Odeh's emotional health. Ms. Odeh was subjected to torture and sexual abuse while she was detained in Israel. As a result of the torture, Ms. Odeh suffers from Post-Traumatic Stress Disorder (PTSD). Further isolation will only exacerbate her PTSD, and lead to a deterioration of her physical and mental health.

For the reasons mentioned above, ADC urges you show leniency in the sentencing of Ms. Odeh. ADC strongly encourages you to take our plea into account and give the matter the serious attention that it deserves.

Sincerely,

Samer E. Khalaf, Esq.  
ADC President



**The Arab American News**  
**5706 Chase Rd,**  
**Dearborn, MI 48126**

Feb. 8, 2015

**Honorable Judge Gershwin Drain,**

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, whom I came to know through the coverage of The Arab American News of the trial. I am Osama Siblani, the publisher of The Arab American News and a community activist.

Rasmea is a respected leader. Her advocacy for immigrant women's issues is an example of her relentless work for her community that views her as a role model.

Although the defendant lives in Chicago, her reputation in the Arab American community of Metro Detroit is that of altruistic activism and care for issues that we hold dearly.

This woman has suffered enough. She was tortured and raped, as documented by a United Nations report. Even the court has acknowledged her claims of torture as credible. But despite all the pain, she transformed her experience into a message of love in Chicago, in a community she adopted as her own.

Rasmea suffers from Post Traumatic Stress Disorder, and being locked in a jail cell will only aggravate the physical and psychological symptoms of her condition. She does not deserve this pain. She is approaching 70, and her health matters to hundreds of people who love and revere her.

Rasmea might face deportation, which would mean the end of countless ties and relationships with her family, friends and proteges. This punishment alone would bring her a significant amount of suffering. To add jail time would accumulate pain that could be spared by a merciful judgement from the honorable court.

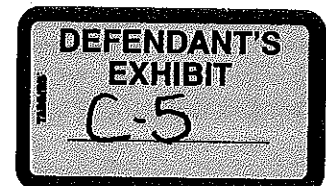
We know that Rasmea and her legal counsel plan to appeal her conviction. Keeping her out of jail would allow her to continue her valuable work for her community and prolong her positive impact on her new country.

Although she was convicted by the jury, Rasmea is no threat to her society; she is a blessing. She has empowered many immigrants who came from the Middle East to call this place home.

Respectfully yours,

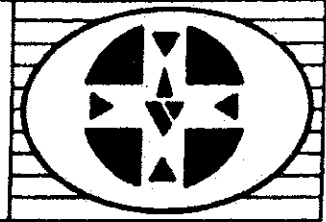


**Osama Siblani**  
**Publisher**  
**The Arab American News**



## Priests of the Sacred Heart

DEHON FORMATION COMMUNITY  
1421 E. 53RD ST.  
CHICAGO, IL 60615-4501  
(773) 752-2325



January 25, 2015

Dear Judge Drain,

I write to ask your consideration of leniency in your March 12 sentencing of MS Rasmia Odeh for conviction of Unlawful Procurement of Naturalization. You may recall that I have written to you previously in support of her.

I am Robert Bossie, a Roman Catholic Priest, a member of the world-wide congregation of priests and brothers, the Priests of the Sacred Heart. During my ministry, I have traveled extensively to various countries including Israel and Palestine. You may also wish to know that before joining my religious community, I was an active member of the U.S. Air Force and an electronic technician and electro-mechanical design draftsman in civilian industry.

I make this request for leniency for several reasons. First, I have known MS Odeh for more than ten years. In that period I have come to know her on personal and professional levels. I know her to be a person who has committed herself to the betterment of the immigrant community, as well as the Chicago community and the larger human community. She has always appeared to me to be a caring and forthright person of great integrity.

For several years, I was part of a team which brought groups of men and woman studying for ministry with the Catholic church to the Arab American Action Network where Rasmia works. During that time, she not only made significant presentation to the groups but she spent time interacting with them on a very personal level. For me this was a very small example of the care, sensitivity and professionalism of MS Odeh.

I ask your consideration of leniency for a second reason. I have worked with persons who were subjected to torture and know, in a small way, the lifelong impact this horrific experience has had upon them. Further time in prison for MS Odeh will only serve to worsen her experience of torture and the Post Traumatic Stress Disorder from which she suffers, as has the time she spent in jail following her recent conviction. I have also learned through torture survivors that participation in improving the community is a major key in healing the emotional/psychological scars of torture. For this reason, I ask you to allow her to maintain her position in the community while she pursues her appeal of her conviction.

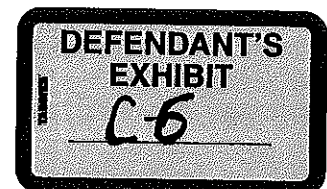
Finally, I would ask you to consider the devastating impact upon MS Odeh should her appeal be rejected and she be deported. She will be cut off from all of her supportive connections fostered these many years she has been in the United States, including family, friends and coworkers. For me, this is punishment enough for any person.

Judge Drain, as a person who has long worked for justice in our struggling human community and one who is committed to a life of compassion and love, please allow me to suggest that compassion for MS Odeh will well serve the justice you are sworn to uphold. Please be lenient toward her.

Respectfully,

*Fr. Robert Bossie, SCJ*

Fr. Robert Bossie, SCJ





January 19, 2015

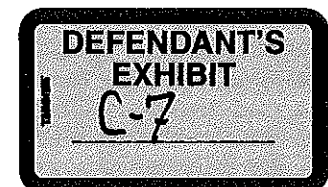
Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmae Odeh.

I have known Rasmae Odeh since the mid 1980's, when I was introduced to her by prominent Jordanian attorneys and interviewed her for a US women's activist publication *WomenNews*. As a human rights advocate and scholar of Arab women, I sought to tell her story of sexual torture in a publication for US women activists who not only firmly opposed the use of torture but wanted to draw attention to the particular ways that women's bodies are abused by torturers. As we know, only by making visible the stories of the invisible can we hope to make positive change in our world.

I met Rasmae again when she moved to Chicago, as I knew many of her family members living there. I knew them because I have done extensive research and published widely on the Arab American experience, especially in Chicago. For this work I have received a Carnegie Corporation Award, a book award from the Arab American National Museum and an *Outstanding Contributions to the City of Chicago* Award from the Chicago Commission on Human Relations, presented by Mayor Richard M. Daley. I can sum up this section by saying that Rasmae comes from a stellar family of engaged activists, people whom I respect deeply.

I came to know Rasmae even more extensively when she began working for Chicago's Arab American Action Network [AAAN], an organization of which I am a long time member of the Board of Directors. With clear evidence that she is gifted with leadership skills, we hired her to work with low-income immigrant women to help in their positive adjustment to life in the United States. Over time, Rasmae became the Associate Director of AAAN because of her commitment to the organization's mission, her hard work among the Arab American Community, and her establishment of the 600 member strong Arab Women's Committee. Rasmae would eventually receive a city-wide award for this work. I should also note that at the same time as she achieved all of these accomplishments, she completed a masters degree in criminal justice. I clearly recall watching her writing her papers late in the evening, after her long day's work was done. Rasmae's work makes women stronger, which in turn makes their communities healthier and their children more resilient to the challenges they face in American society.



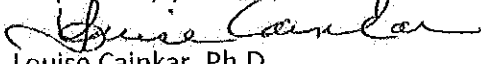
As a survivor of torture, Rasmaea should not be punished in any way that may harm her mental health. The best medicine for Rasmaea is to stay engaged in active work empowering low-income immigrant women, so they will never endure physical abuse, as she did. This type of work helps to heal her wounds, which will never completely go away.

Needless to say I was shocked when Rasmaea was sent into detention after her conviction. She has a family, a community, and poses no flight risk. I was further shocked by her placement in solitary confinement. Rasmaea is a 67-year-old woman who works every day caring for others! It is always sad when human beings are seen not for who they really are but as mere numbers.

Rasmaea Odeh is a hard working, passionate woman whose life goals include improving US society to be more just, and improving the conditions of women and youth who live within in. I can tell you from all of my research that the discrimination and prejudice that Arab women and children [and men] endure make for a life that is not easy. For low-income families, the racism they face from others is compounded by a lack of economic means. These are the people Rasmaea is building, strengthening, for their own benefit and for the benefit of our society at large. In light of her personal history and these facts of life in the Arab American community, I think Rasmaea's sentence should be community service.

Rasmaea is a noble leader and someone I admire very much. I often wish I had many of her talents. But alas, I am a scholar and a teacher and she is the person working in the trenches of difficulty. Please consider your utmost leniency for Rasmaea. As I said above, the most appropriate sentence for Rasmaea, and indeed for this country, would be community service.

Respectfully yours,

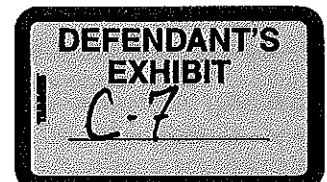


Louise Cainkar, Ph.D.

Associate Professor of Sociology and Social Welfare and Justice

Marquette University

Louise.Cainkar@mu.edu





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Patron, Sabeel International

**The Rev. Canon Naim Ateek**  
President/Director Sabeel Ecumenical Liberation Theology Center, Jerusalem

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**Cornel West**  
Princeton University

January 15, 2015

The Honorable Judge Gershwin Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd. Room 123  
Detroit, MI 48226

Dear Judge Drain:

I write to you on this birthday of the Rev. Dr. Martin Luther King, Jr., having just seen the remarkable film "Selma." This powerful film brought back memories of the brutality African Americans endured as they struggled against the ugly specter of racism and denial of their full human and civil rights. It also evoked deep emotional responses in my soul as I remembered my first church assignment after finishing seminary, an African-American congregation on the Newark-East Orange, New Jersey border. The manner in which that congregation accepted me, a young white clergyman, instilled in me a commitment to struggle for justice and human rights for the rest of my life. I'm sure we share similar values and commitments despite the different trajectories of our career paths.

It was a natural progression for me to take on the challenge of Palestinian human rights shortly after my ministry in Newark and East Orange. It is from this perspective, the parallels between the civil rights struggle in the United States and the Palestinian's quest for justice and human rights, that I am writing on behalf of my fellow Chicagoan, Rasmea Odeh.

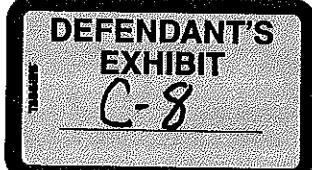
At the outset, I would like to thank you for permitting Rasmea to be released from the St. Clare County Jail so she could spend several weeks with her family and community. I was thrilled to see the joy on her face at a community event in December, give her a hug, and share in a welcome home celebration with several hundred of her friends (Christian, Muslim, Jewish, secular, African American, Latino, Asian). I sincerely hope the Chicago community will have a larger celebration once the highly questionable charges against her are dropped on March 10<sup>th</sup>.

Rasmea is a woman of deep compassion and sacrificial service among predominantly poor refugee women on the southwest side of Chicago. I first met her approximately ten years ago when I brought one of my university classes to meet Rasmea and other staff at the Arab American Action Network. My class was studying peace and conflict transformation and the AAAN has been a model of peacebuilding in Chicago for several decades. My students were touched by Rasmea's work with women and heard similar stories from other staff. Since that initial meeting I have met Rasmea on several occasions and can testify that her reputation is legendary. I join Rasmea's community in asking you to allow her to continue this vocation of healing that she performs so well.

Having devoted most of my career to education and the struggle for human rights

Non-profit 501(c)(3) Tax-Exempt Org.  
ID# 38-3419440

Friends of Sabeel-North America  
PO Box 9186, Portland, Oregon 97207 (503) 653-6625 friends@fosna.org www.fosna.org



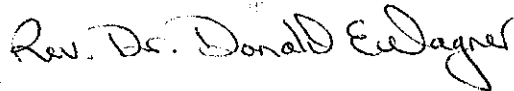
For the past two years my organization, Friends of Sabeel-North America, has been working to end Israel's current practice of imprisoning and detaining an average of two children every day. Most of the children are taken from their homes in terrifying night raids. Many of these children are abused and some are tortured. At the end of the ordeal they are forced to sign confessions in Hebrew (a language they neither read or write) stating they are guilty of crimes they never committed. These coercive practices have been documented by UNICEF, the preeminent Israeli human rights organization B'Tselem, Defense of Children International, and other respected international organizations. These are the same practices that Rasmea endured in prison several decades ago, only her experience was worse. We know that she was tortured and raped before being forced to sign the confession in Hebrew, a language that is completely foreign to her. Evidence extracted under these conditions should never be admissible in any court of law, particularly in the United States.

I am profoundly troubled that an order of deportation would condemn Rasmea to a living hell as she could face comparable abuse. She has already suffered unspeakable trauma at the hands of the Israeli army and, on humanitarian grounds alone, I plead with you to spare her that ordeal. Instead, I urge you to return Rasmea to her community and the work she loves and does so well.

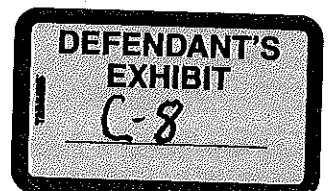
Your decision will impact not only Rasmea, but a whole community and thousands across the nation who are watching this case with great interest. A decision for justice and freedom for Rasmea will be a sign that Palestinians and Muslims can indeed attain justice in the U.S. courts and are not subject to the pressures, myths, and injustices that in many ways parallel what African-Americans faced for generations. While Palestinians cannot attain justice in Israeli military courts, we have an opportunity with this case, to demonstrate that the United States has a single standard of justice, and our legal system can rise above those forces that would undermine truth and justice.

May God grant you wisdom and discernment in your decision on March 10th.

Respectfully yours,



Rev. Dr. Donald E. Wagner  
National Program Director  
Friends of Sabeel—North America



266 Merrimon Avenue  
Asheville, NC 28801  
1 February 20155

Honorable Judge Gershwin Drain:

I am writing to request leniency from you in the March 12 sentencing of Rasmae Odeh.

As you know, in November 2014, Rasmae was convicted of Unlawful Procurement of Naturalization. Compassion in her sentencing will serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her.

As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder. Also, as a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens.

If Rasmae loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term.

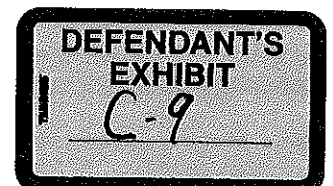
Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Rasmae is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmae's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

Throughout her life Rasmae has been a responsible, contributing member of society, and deserves to be set free to regain her health and continue this important work. I therefore urge you to grant her appeal and be extremely lenient in your sentencing of her.

Respectfully yours,

Douglas E. Wingeier, PhD  
Emeritus Professor, Garrett-Evangelical Theological Seminary  
Evanston, Illinois





Lisa A. Kosowski  
5313 N. Ravenswood  
Unit 301  
Chicago, Illinois 60640

February 5, 2015

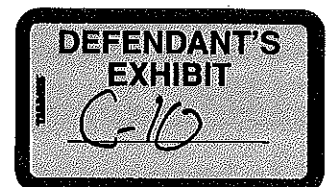
To the Honorable Judge Gershwin Drain:

I am writing on behalf of the Arab Jewish Partnership for Peace & Justice in the Middle East ("AJP") to respectfully request leniency when you sentence Rasmea Odeh on March 12, 2015.

I am an attorney who represents children in the Cook County Child Protection Court in Chicago. I am also a Jewish American and the daughter of a Holocaust survivor who has been working with other Chicago activists from a wide range of religious and cultural backgrounds for a just peace in Israel and Palestine. I visited Israel and Palestine last year on a solidarity delegation with a group of Jews and Palestinians, mainly from the Chicago area, including my rabbi and fellow members of Jewish Voice for Peace.

I personally have known Rasmea for about 15 years. She is related by marriage to a close friend of mine and a fellow AJP coordinating committee member. Considering the multiple traumas that Rasmea has suffered, literally since the year of her birth, one could understand if she was a cold, hard and angry person. Nothing could be further from the truth. Rasmea is a warm, kind and empathetic person. She lives very modestly and devotes her time and energy to helping immigrant women in the Chicago Arab community face the challenges of adapting to a new country and culture. Before Rasmea created the Arab Women's Committee, there were no social service agencies that could address the needs of this population due to language and cultural barriers. Rasmea bridged that gap so that women could have access to services such as counseling and legal assistance in cases of divorce and domestic violence. Rasmea is the backbone of a community that loves her as much as she loves them.

As a young woman, Rasmea was tortured for 25 days into a confession to a crime for which she served 10 years in an Israeli prison. Since being released so many years ago, Rasmea has led an exemplary life and has made an immeasurable contribution to the Chicago community. She is now a 67 year-old senior citizen with health problems and a diagnosis of PTSD. She already served a month in the St. Clair County jail including 3 weeks in solitary confinement and even this relatively short incarceration took a toll on her health.



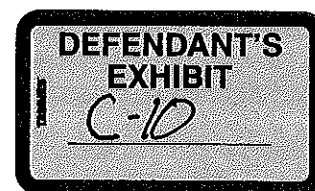
If Rasmea loses her appeal, she will likely be stripped of her citizenship and deported - resulting in an elderly woman having to start her life over and permanently separate from her family, friends and community. This is devastating enough without compounding it with a prison term.

And should her conviction be overturned on appeal, allowing her to return to her community in Chicago will allow her to continue her important work with immigrants and refugees families.

The members of AJP believe that Rasmea has suffered enough and we implore you to impose leniency when imposing your sentence.

Respectfully,

Lisa A. Kosowski, Coordinator, on behalf of the Arab Jewish Partnership for Peace & Justice in the Middle East Coordinating Committee



Levantine Cultural Center  
5998 W. Pico Blvd.  
Los Angeles CA 90035

January 14, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a professional colleague and community leader. We met as members of the National Network of Arab American Communities, a project of ACCESS and the Arab American National Museum, in Dearborn, Michigan. I direct the Levantine Cultural Center in Los Angeles, where for over 13 years, we have served the greater Los Angeles area by presenting arts and education programs on the Middle East and North Africa. Welcoming people of all nations and religions, the Center fosters friendship and open dialogue, fights ignorance and intolerance, and forges a stronger, more diverse American society through programs and services that bridge political, cultural and religious divides.

The community-building and women's empowerment work that Rasmea Odeh has been doing in the Chicago area is absolutely exemplary and vitally needed. She is an individual of magnificent character, whose past has indeed come back to haunt her. I feel that the harm already done to Rasmea in this case has been egregious and unjust, and kindly request your understanding and leniency in her case.

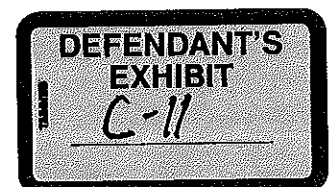
As a 67-year old woman, Rasmea's health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, and should she lose her appeal, she would likely lose her citizenship and face deportation as well, effectively ending life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term.

Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

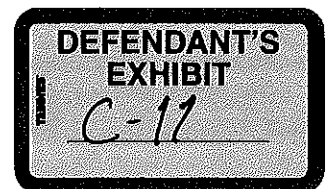
Respectfully yours,

**Jordan Elgrably**  
Executive Director

Levantine Cultural Center



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Since 2001



UNIVERSITY OF ILLINOIS  
AT URBANA-CHAMPAIGN

Asian American Studies Department  
1208 West Nevada Street, MC-142  
Urbana, IL 61801-3818



Judge Gershwin A. Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

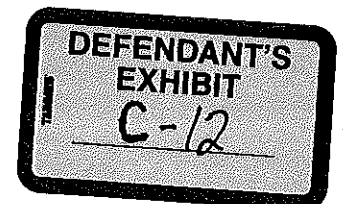
February 1, 2015

Honorable Judge Gershwin Drain,

Allow me to introduce myself. My name is Junaid Rana and I am an Associate Professor of Asian American Studies at the University of Illinois at Urbana-Champaign. I write today to request leniency in the case of Rasmea Odeh in the March 12 sentencing. Before I met Ms. Odeh I knew of her for many years through her reputation as a community activist with Muslims and Arab Americans in Chicago.

In the last couple of years I have had the honor of getting to know Rasmea and the network of friends and intimates that surround her. I can say without any exaggeration that Rasmea Odeh is a formidable and vital part of this community. The work she has done as a community organizer has touched many Arab Americans in the Chicago area. I have deep respect and admiration for Rasmea. I write as an acquaintance and as someone who has studied and researched ethnic and racial groups in the United States and their struggles to achieve equality and respect. Having sought the refuge of democratic freedom, Palestinians living in the United States know all too well the disparities of not being treated as equals in their ancestral homelands. Rasmea has been a central part of bridging these difficulties in the Arab American community and is an indispensable part of the mission of the Arab American Action Network where she is the deputy director. Additionally, she established the Arab Women's Committee, which has some 600 members and serves an essential function of providing a space of empowerment for Arab immigrant and refugee women. This principled work is a hallmark of the role that Rasmea has come to play in the lives of so many. By helping others through her civic engagement she has become a much beloved pillar of the community.

For some 10 years Rasmea has been an active and productive member of Chicago's Arab and Muslim community. Working with refugee and immigrant women from the Arab world who often face specific issues and problems, the role that Rasmea fills is irreplaceable. She has valuable knowledge and skills learned through her own experiences of escaping brutality and cruelty. Foremost is the fact that Rasmea has devoted her life to others, to ameliorate their condition and aid in the transition often from harsh conditions. She is a survivor of torture and has been diagnosed with post traumatic stress disorder in the aftermath of the horrific treatment she received while in Israeli detention and prison over a 21-day period. The appalling handling



included electro-shock and rape with clubs. This is a necessary and difficult part of her specific case history that must be considered.

Having been a victim of a mass arrest as a young student and forced to face an Israeli military court that rarely affords Palestinians just and fair treatment, to now sentence her to further prison time and potentially strip her of American citizenship is to add cruelty to injustice. Let me be plain, Palestinians living under occupation in their own land face a system of apartheid in the legal and criminal system that views them as less than human. It pains me to think that Rasmea must further suffer even here in the United States. Only compassion can prevail in what has already been a harrowing experience. The evidence of her contribution through her devoted service work to those in need in Chicago is, I hope, a strong case for leniency.

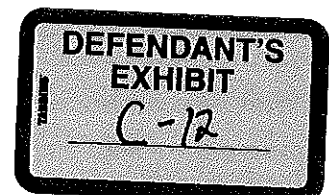
After being convicted of 'Unlawful Procurement of Naturalization' in November of 2014, Rasmea was immediately detained for a month in which she was placed in solitary confinement for 3 weeks. Imprisoning a 67 year-old women in ill health any further while this case is on appeal can serve no productive purpose. I urge you to consider allowing Rasmea to continue to do her community work and serve those who will benefit most from her contributions.

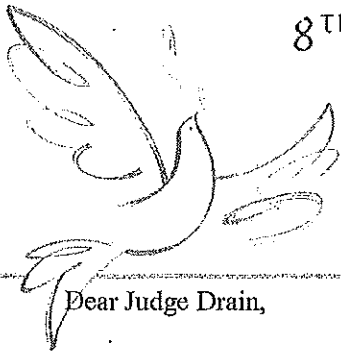
Judge Drain, I plead for you to provide leniency in a case that has already been filled with tragedy and difficulty. Rasmea Odeh is an active contributor to the good of society and has provided an important service to Muslim and Arab Americans in Chicago. She has received awards for this civic duty and has been commended for her outstanding service. At this juncture, to allow her to continue to do her work in Chicago while her case is on appeal would yield the greatest benefit for all those concerned.

Respectfully,



Junaid Rana  
Associate Professor





# 8<sup>TH</sup> DAY CENTER FOR JUSTICE

205 W. Monroe St. Ste. 500  
Chicago, IL 60606  
tel. 312.641.5151  
fax. 312.641.1250

Dear Judge Drain,

February 7, 2015

We write to request leniency from you in the March 12 sentencing of Rasmea Odeh, who we've known as longtime a friend and colleague of the 8<sup>th</sup> Day Center for Justice.

8<sup>th</sup> Day Center for Justice is a Catholic organization that was founded in 1974 by religious men and women seeking a more just and peaceful world. This year, at 8<sup>th</sup> Day's 40<sup>th</sup> anniversary celebration, we awarded Rasmea Odeh with the *Sr. Mary Elsbernd Award*, a distinguished honor awarded to individuals who we believe personify the values of Passion, Relationship, and Imagination. The award is named after Sr. Mary Elsbernd, a Franciscan Sister who dedicated her life to preaching the Gospel message of love and justice. Rasmea Odeh's commitment to working for equality and justice within and beyond her community here in Chicago made her an unequivocal candidate to receive the honor in Sr. Mary Elsbernd's name.

8<sup>th</sup> Day has known and worked with Rasmea Odeh and the Arab American Action Network (AAAN) for many years as an ongoing partner and through our annual Urban Plunge program, a week-long immersion into justice work in Chicago. Each year when 8<sup>th</sup> Day visits AAAN during the Urban Plunge, participants (who are both religious and lay people) were touched by Rasmea's passion for making this city, country, and world a more just and loving place. She truly lives the Gospel message of compassion and love, both in her relationships and in her work on behalf of those who have been pushed to the margins of society.

We at 8<sup>th</sup> Day want to assure you that this pillar of Chicago's Palestinian community is no flight risk. On the contrary, Rasmea has a deep commitment to her community, to her supporters across the country, and to her own family members living in Chicago – two nephews and several cousins.

During her trial, the presence of dozens of members of the Arab Women's Committee (AWC) is a testament to the fact that Rasmea's connection to these women is not professional, but rather, very personal. As immigrants, the AWC has helped them overcome feelings of isolation and the bond between Rasmea and members of the Committee cannot be overstated. Her connection to this community of women is described by all of them as "like a family." This is why they left families at home in Chicago, and traveled 5 hours each way on buses to be with Rasmea during this difficult time. Their presence was a comfort to Rasmea, and her arrest and detention were devastating to them.

Countless other community members, from Chicago and beyond, also filled your courtroom and an overflow courtroom throughout the trial. Some hailed from Detroit and Dearborn, but most traveled much further to support Rasmea, a valued community leader. Time and again, Rasmea assured her supporters that no matter the outcome in her case, we must "be strong" and "stand together."

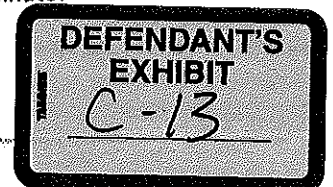
We stand with Rasmea and request leniency from you at her March 12 sentencing session. Thank you for your time and consideration.

Respectfully,

*Liz Deligio*  
Liz Deligio  
8<sup>th</sup> Day Center for Justice Co-coordinator

*Chris Eagan*

Chris Eagan  
8<sup>th</sup> Day Center for Justice Co-coordinator





February 2, 2014

Re: **Rasmea Odeh**

Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 10<sup>th</sup> sentencing of Rasmea Odeh, who I know as a dedicated community leader and respected ally of African immigrants and refugees in Illinois.

As Executive Director of United African Organization, I have had the opportunity to partner with Rasmea in organizing and advocating for voiceless and marginalized communities over the years. She always exuded a deep sense of optimism, boundless energy, and inspiring presence in the arduous task of serving vulnerable populations with dignity and compassion. A principled and tireless leader, she sacrificed countless hours to connect clients to needed services and strengthened partnership with multi-racial and multi-faith network of service providers and advocates for immigrants and refugees.

In November 2014, Rasmea was convicted of Unlawful Procurement of Naturalization. I am asking for compassion in her sentencing, as the only way to serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her. As a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as it surely would in any facility lacking medical services and accommodations to provide for senior citizens.

Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow our beloved sister and leader to continue as a contributing and productive person, doing the exemplary and inspiring work that is so critical to hundreds of refugee women in Chicago's diverse immigrant and refugee communities.

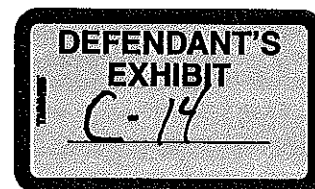
Rasmea is a strong pillar of hope and dignity for all of us as we seek to uphold our cherished American values of tolerance and inclusion.

Sincerely,

Alie Kabba, Executive Director

3424 S. State St. Suite 3CB-2  
Chicago, IL 60616

Tel: 312-949-9980  
Fax: 312-949-9981  
www.unafricans.org





Patricia Riley Johnson  
3318 Fessenden St., NW  
Washington, DC. 20008

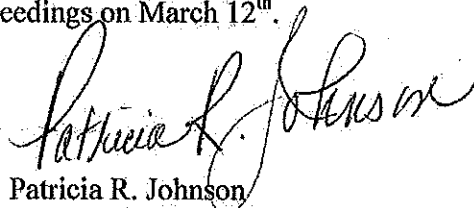
Dear Judge Drain,

I respectfully write to request leniency in the March 12<sup>th</sup> sentencing of Ms. Rasmea Odeh, a woman who has served her community and country in exemplary ways.

None of us is above the law. Fair punishment for criminal activity has been extracted here. Rasmea has suffered enough for neglecting to indicate a conviction by an Israeli military court. She was tortured into signing a confession at that time and the fact that she has already spent 10 years in prison for the crime – and subsequently held in solitary confinement for three weeks in our country - further indicates that we have extracted enough suffering.

Please, as a purveyor of justice, grant leniency to Rasmea. Any one who spends ten years in prison for a crime they didn't commit deserves decency and understanding.

May God bless you and watch over the proceedings on March 12<sup>th</sup>.

  
Patricia R. Johnson  
Canon Missioner  
Washington National Cathedral

DEFENDANT'S  
EXHIBIT

C-15

February 6, 2015

The Reverend Nancy S. Hildebrand  
St. David's Episcopal Church  
5150 Macomb  
Washington, D.C. 20016

Dear Honorable Judge Gershwin Drain,

I write as an ordained priest in the Diocese of Washington, who is active on the Diocesan Committee in Washington that originated from a partnership agreement between the Bishop of Washington and the Bishop of Jerusalem. We have raised funds for the Diocese of Jerusalem's many schools and hospitals, and have, in the process, become very concerned about the condition of the Palestinians under military rule of the Occupation.

I write to lend my voice for leniency for Ms. Rasmia Odeh. I ask that she be released from jail pending her appeal of her sentence.

I and others on our committee have heard about Ms. Odeh's arrest and imprisonment in an Israeli military court, and also about the military's injunction against her disclosing the details of her arrest and imprisonment. Ms. Odeh is a survivor of torture and lives with PTSD as a result of her experiences in Israeli detention.

I believe that Ms. Odeh has been unfairly put between a rock and a hard place, enjoined not to talk about her arrest and imprisonment, and required to talk about it by a strong ally of Israel, the United States. How would anyone know how to respond in such a case? I ask for mercy for Ms. Odeh, whose health is impaired and who would suffer further in detention as she waits for her appeal.

I fervently pray that justice and peace of mind will finally be Ms. Odeh's reward for her courage under extreme duress and for her incredible record of service to her Chicago community as a servant of Muslim women in need. There is no better example of human service than Ms. Odeh's. How tragic that she is now removed from the ability to serve her community and is separated from her family, from whom she was so cruelly separated while in prison.

I respectfully ask for her release while she awaits for her appeal to the existing decision. Her health depends on it.

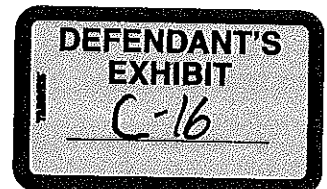
Sincerely,

The Reverend Nancy S. Hildebrand  
Associate Rector, St. David's Episcopal Church  
The Diocese of Washington

and

Member

The Companion Diocese Committee for Jerusalem



Peter H. S. Sporn, M.D.  
719 South Ridgeland Avenue  
Oak Park, Illinois 60304-1432

February 8, 2015

Judge Gershwin Drain  
United States District Court, Eastern District of Michigan  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

**Re: Rasmae Odeh**

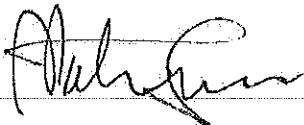
Honorable Judge Drain:

As a physician who has spent time doing medical and human rights work in the Occupied Palestinian Territories and in Israel, I am very familiar with the situation that Ms. Rasmae Odeh fled when she came to the United States many years ago. My experiences in the Middle East have sensitized me to the circumstances of Ms. Odeh's case and to her current plight.

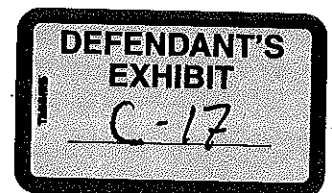
More directly, in recent years I have become acquainted with Ms. Odeh and her work through mutual colleagues in the Arab-American community. I am a member and supporter of a civic organization, the Arab-Jewish Partnership for Peace and Justice in the Middle East. Through my involvement in this organization, I have worked with Ms. Odeh in supporting efforts to achieve a just and peaceful solution to the Israeli-Palestinian conflict. Because of this shared commitment, I am also aware of the legal case brought against Ms. Odeh, and of her recent conviction.

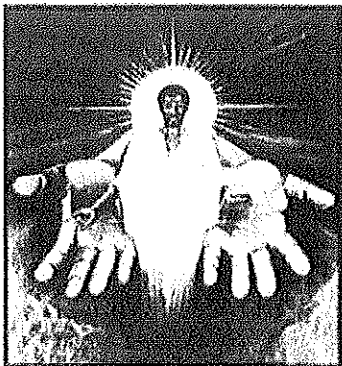
I write to tell of my first-hand knowledge that Ms. Odeh is an extraordinary woman. She has endured much suffering in her life, but rather than harden her, it has made her more sensitive and compassionate toward those in need. She has selflessly and dutifully contributed her skills and energies to helping Arab American and other women and families in the Chicago region for many years. She has been recognized by the Mayor of Chicago with a community service award for her work. Rasmae Odeh is a gentle soul who poses no threat to anyone, and she does not deserve a prison sentence. Thus, I urge you to exercise compassion and leniency in considering the sentence you will impose. Justice would not be served by imprisoning Ms. Odeh. As much as anyone, you are without doubt keenly aware that that our prisons are overflowing with individuals convicted of non-violent offences. Please do not add to this problem by sentencing Ms. Odeh to prison, when to do so would achieve no purpose and benefit no one.

Sincerely yours,



Peter H. S. Sporn, M.D.  
Professor of Medicine  
Northwestern University Feinberg School of Medicine





## *Faith Community of St. Sabina*

1210 West St. Sabina (78th) Place • Chicago, Illinois 60620 • Phone (773) 483-4300 • Fax (773) 483-7583

[www.saintsabina.org](http://www.saintsabina.org)

February 4, 2015

To Judge Gershwin Drain:

I am Rev. Michael Pflieger, Senior Pastor of the Faith Community of Saint Sabina, and I am writing this letter in support of Rasmae Odeh receiving leniency in her sentencing.

Ms. Odeh has been an activist in Chicago for more than 10 years she has been an upright citizen and positive contributor to her community. She has actively fought for Arab women's rights through Chicago based Arab American Action Network, specifically coordinating and supervising programs for its Arab Women's Committee.

It is my understanding that there some dispute with regard to her application for citizenship from 10 years ago, however within those 10 years, and prior, Rasmae has worked diligently to not only become an American citizen but to remain one who works to make life better for all inhabitants of this great country.

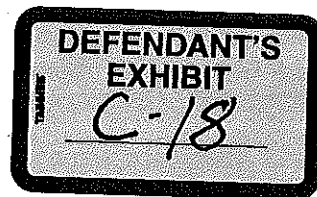
Due to the aforementioned qualities, Ms. Odeh's age, and her physical well-being I am asking that the court have leniency, and that the court will take these things into account along with the time she has served when determining her sentence.

Thank you for your time and consideration in this matter.

In the Pursuit of Justice...

Rev. Michael L. Pflieger  
Senior Pastor

*"An African American Catholic Community of Faith, Education and Service"*





# Priests of the Sacred Heart

Provincialate Offices, United States Province  
7373 S. Highway 100, P.O. Box 289  
Hales Corners, Wisconsin 53130-0289

General Phone: 414-425-6910  
Fax: 414-425-2938

Mark Peters  
Director of Justice, Peace and Reconciliation  
Priests of the Sacred Heart, United States Province  
7373 S. Lovers Lane Road  
Franklin, WI 53132

January 26, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, a community leader I have come to know through her work with the 8<sup>th</sup> Day Center in Chicago. I became involved with 8<sup>th</sup> Day in my capacity as the justice and peace coordinator for a men's religious order which has been affiliated with the center since the 70's.

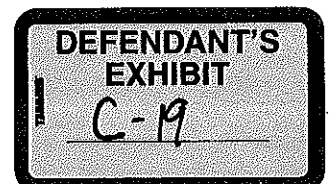
Our order has been very involved in the issue of immigration, having many members who themselves are immigrants from Europe and Asia, and serving working with immigrants in Texas for decades. I heard Rasmea speak at the 8<sup>th</sup> Day Center last year and was impressed with her humanity, compassion, and willingness to speak out on behalf of others who suffer. She used her time of freedom to work for the betterment of her community in Chicago, and because of that work, immigrant and refugee women from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support and gain empowerment and community.

Rasmea, 67, is a survivor of torture, and the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD). After her November 2014 conviction, Rasmea was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her. The St. Clair County Jail, where she was held, lacks medical services and accommodations for senior citizens. I ask for compassion in her sentencing, which would serve justice in this case.

If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This would end life as she knows it, cutting all her ties with family and community in Chicago. I understand that there is a possibility of her conviction being overturned on appeal, so keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community. Her friends have argued that this engagement is critical to her emotional health. Prison is not the place for her, and it would not benefit anyone to put her there. Thank you for your consideration.

Respectfully yours,

Mark Peters  
Director of Justice, Peace and Reconciliation, POSH/USA



TRINITY  
UNITED  
CHURCH  
of  
CHRIST

CHRIST  
COMMUNITY  
CULTURE



UNASHAMEDLY  
BLACK  
UNAPOLOGETICALLY  
CHRISTIAN

February 4, 2015

Judge Gershwin A. Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

Honorable Judge Gershwin Drain:

I am writing you today to request leniency from you as you consider sentencing of Rasmea Odeh, on March 12, 2015, a woman that I know as an incredible community presence and active supporter of immigrant and refugee women in Chicago.

Currently I serve as the Executive Director, Multimedia Communications at Trinity United Church of Christ, here in Chicago, but my passion – my calling – since moving from Detroit in 1997, has been working with our Prison Ministry and with our social justice ministries. For the past five years I've also trained in Restorative Justice and work throughout the community as a Circle Keeper, currently working with young men in the Cook County Jail's York High School.

I am moved to write to you as a citizen that recognizes the importance of each and every resource that serves to better our communities, and in recognition of the incredible work that Ms. Odeh has done to bring a sense of home, of comfort, and of empowerment to women at the end of their rope . . . of their hope.

In November of last year, Rasmea was convicted of one count of Unlawful Procurement of Naturalization, for failing to note on her immigration application more than 10 years ago, that she had been convicted 40 years earlier in an Israeli military court . . . based on a tortured confession.

As a Restorative Justice practitioner, we try to look at justice from the side of victim, perpetrator, and community, with the goal of recognizing everyone's humanity, and to attempt a fair restoration.

My plea to you, your Honor, is to recognize the humanity of Ms. Odeh and to take into account her life work in assisting the refugees of the far too many conflicts we see in our world, as you consider fair restoration.

I serve a God of Mercy and Grace, and while I pray for leniency in Rasmea's case, recognizing the wonderful work she does in our community, I am also praying that God continue to fill you with the wisdom and discretion needed to ". . . do justice, love mercy, and walk humbly with your God."

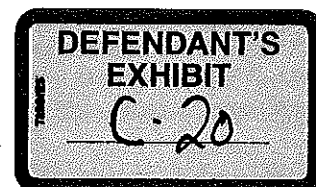
Thank you for your consideration, and God bless you,

A handwritten signature in black ink, appearing to read "Daryle E. Brown".

Daryle Brown  
Executive Director, Multimedia Communication

Trinity United Church of Christ [www.trinitychicago.org](http://www.trinitychicago.org)  
400 W. 95th Street Chicago, IL 60628-1120

Telephone (773) 966 - 1544





COALITION OF AFRICAN, ARAB, ASIAN,  
EUROPEAN & LATINO IMMIGRANTS  
OF ILLINOIS

**CAA AEELII**

...Sharing a Vision

4300 North Hermitage Avenue • Chicago, Illinois 60613

Tel: (773) 248-1019 • Fax: (773) 248-1179 [www.caaaelii.org](http://www.caaaelii.org) • [contact@caaaaelii.org](mailto:contact@caaaaelii.org)

February 6, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh who I know as a community leader, colleague and long-time ally of the Arab and larger immigrant community in Chicago. I have known Rasmea for more than 10 years as the founding Executive Director of the Coalition of African, Arab, Asian, European and Latino Immigrants of Illinois. I have known Rasmea in her role as Associate Director of the Arab American Action Network where she has been serving low-income, low-literate Arab immigrants for many years. She also has been an active partner of CAAAEELII in our cross-cultural, multi-ethnic activities promoting immigrant integration.

In November 2014, Rasmea was convicted of Unlawful Procurement of Naturalization. Compassion in her sentencing will serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her.

As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD).

As a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens.

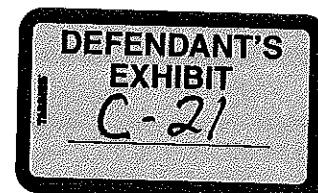
If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating; adding a prison term should not compound it.

Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community and the larger immigrant community as well.

Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

Respectfully yours,

Dale Asis  
Former Executive Director



Shani Mandisa Moore  
Health Law Attorney  
Women's Health and Justice Initiative  
1824 Oretha Castle Haley Blvd.  
New Orleans, LA  
70113

February 4, 2015

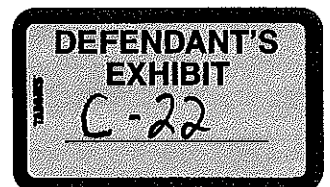
Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh. I am a leading expert in advocacy and activism focused on ending violence against women of color and immigrant women in the United States. I am a leading member of a major network of anti-violence advocates founded in 2000 with local chapters and affiliates across the United States. Our work brings together feminist activists working to collectively understand and address the ways gender and sexual violence impact women of color and immigrant women.

I became acquainted with Rasmea Odeh's story in 2005 when many activists working to end gender violence in the United States learned about the unprecedented efforts of Rasmea Odeh in producing new and creative solutions for the problems recent immigrant and refugee women were facing in Chicago (through her leadership in the Arab Women's Committee). My network then invited Rasmea Odeh to lead a workshop at a national conference, "Color of Violence (3): Stopping the War on Women of Color" in New Orleans, Louisiana (2005). We knew that her presence at this anti-violence conference would empower women participants especially since she herself survived sexual torture in 1969 followed by ten-years imprisonment (based on a forced confession) and still managed to continue playing a major leadership role that was transforming the lives of hundreds of immigrant women in Chicago. We also thought her strength and courage would positively impact conference participants since she is considered a pioneer in the international women's movement for having the courage to speak at the United Nations in 1979 about the sexual assault she endured.

In November 2014, advocates in the anti-violence movement were devastated to learn that Rasmea was convicted of Unlawful Procurement of Naturalization. As experts in advocacy on behalf of women survivors, we could easily see that her Post Traumatic Stress Disorder (PTSD) had everything to do with the way she answered the questions on her immigration form about her previous imprisonment. We were also deeply concerned that after the verdict, she spent 3 weeks in solitary confinement and has since suffered from medical problems and worsening conditions of PTSD.

No woman should be punished for the after effects of sexual violence (that is, the PTSD that obstructed Rasmea from being able to read and think about questions related to her former imprisonment).





The time Rasmea Odeh spent in St. Claire County Jail made it more clear than ever that as a 67 year old woman with serious health problems, Rasmea's health will continue to deteriorate in prison and her future will entail more and more undue suffering. It is enough that if Rasmea loses her appeal, she will face deportation and will no longer be able to do the work that has helped her survive her past traumas. Imprisonment (and/or deportation) of Rasmea will also devastate hundreds of immigrant women whose needs cannot be met without Rasmea's leadership in Chicago.

Imprisoning Rasmea Odeh will send a terrible message to thousands of women advocates across the United States who are working to end sexual assault and to ensure that survivors receive the care and support they need to live a full and healthy life without fear or further attacks against them.

In fact, many advocates in the anti-violence movement have been counting on interacting with the distinguished and renowned Rasmea Odeh's at an upcoming national conference in Chicago March 26-29, a conference that will include over 1,000 participants, including leading figures in the anti-violence movement, young women, and representatives from nearly every racial, ethnic, and immigrant community in the U.S.

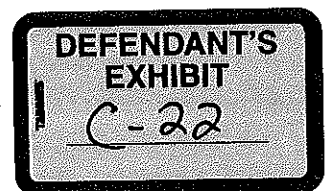
<http://www.colorofviolence.org/call-for-proposals.html>. Should Rasmea Odeh be incarcerated or deported by then, I am confident that participants at this conference will view her absence as a gap in our community of women leaders that cannot ever be filled and as a major blow against all efforts to end sexual violence and provide survivors with the care they deserve in the United States.

For these reasons, as someone at the forefront of the anti-violence movement who truly understands the realities and needs of survivors of sexual assault, I feel strongly that incarcerating Rasmea Odeh (on top of possibly taking away her citizenship) would be a crime against humanity and an assault on all survivors of sexual violence and I very sincerely request leniency in this case.

Sincerely,

Shani Mandisa Moore

Shani Mandisa Moore





**American Friends  
Service Committee**

*Midwest Regional Office*

637 S. Dearborn St., 3rd Floor · Chicago, IL 60605 · 312-427-2533 · [www.afsc.org/chicago](http://www.afsc.org/chicago)

January 14, 2015

Honorable Judge Gershwin Drain,

I am writing to implore you to extend leniency in your March 12 sentencing of Rasmea Odeh,

In my capacity as Midwest Regional Director of the American Friends Service Committee – and previously as a congregational rabbi and activist – it has been my honor to work alongside Rasmea for almost ten years. I can attest to her upstanding moral character and her compassionate devotion to the cause of justice for Chicago's Arab and Muslim community. Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving immigrants and refugees wherever she has lived.

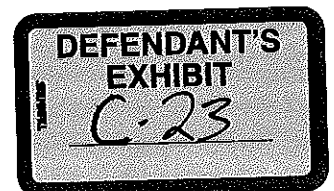
I am particularly concerned about the impact a long sentence will have on Rasmea as a torture survivor. She has already been detained for a month in prison, including almost three weeks in solitary confinement. As a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens. Those of us who know and love Rasmea are deeply concerned about the effects further confinement will have on her emotional and physical health.

I understand that there is a possibility of her conviction being overturned on appeal. I do believe that keeping her out of prison would allow her to continue as a contributing and productive community leader, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community. I strongly believe that a sentence without additional prison time for Rasmea will serve the cause of justice in this case.

Respectfully yours,

Rabbi Brant Rosen

Regional Director, Midwest  
American Friends Service Committee



Professor Anna Guevarra  
Asian American Studies  
University of Illinois, Chicago  
(affiliation for identification purposes only)

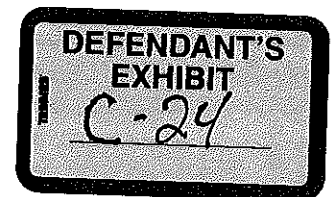
February 1, 2015

Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh. I am a senior professor at the University of Illinois, Chicago (UIC) and the chair of the Asian American Studies Program. I have extensive research and teaching experience focusing on issues related to immigrant women and women who have faced war and displacement, both in the U.S. and abroad.

I became aware of Rasmea Odeh's work over the past few years when I learned about the unprecedented leadership role she has been playing in Chicago to meet the needs of a large population of Arab immigrant women. In fact, there are few immigrant women in the United States who have positively transformed the lives of immigrant women to the extent Rasmea has. As a specialist in the study of immigrant women, I am extremely concerned that her condition of PTSD worsened while in detention and solitary confinement in November 2014 in St. Clair County Jail. I was outraged to learn of the cold, damp, and extremely unhealthy conditions within St. Clair County Jail where Rasmea's existing health conditions worsened and medical services and accommodations were sorely lacking. It is clear that Rasmea has managed and maintained her well-being and her PTSD over the past decade in the United States by establishing strong connections and ties to her community. I am deeply concerned that she will become even more ill with the isolation and conditions of imprisonment.

In fact, I have been following Rasmea Odeh's community work closely as one of my colleagues developed a project with Rasmea that allowed UIC to develop a collaboration with the Arab Women's Committee (the committee through which Rasmea has established herself as a model of community leadership and social service provision in Chicago). This project was funded by the Institute for Policy and Civic Engagement (IPCE) and allowed a UIC professor and several of our students to participate in workshops Rasmea was leading with immigrant women in Chicago. This was an incredible educational experience for our students. Many professors and students at the University of Illinois, Chicago were proud to know that our institution had the opportunity to be part of community work that assists immigrant women with their economic problems and the difficulties they face accessing the social services and language skills needed to survive their daily lives.



Rasmea is an important community leader whose work has impacted numerous lives so much so that last year, she received the prestigious "Outstanding Community Leader Award" from the Chicago Cultural Alliance for her four decades of work in empowering Arab women's lives in Chicago and abroad.

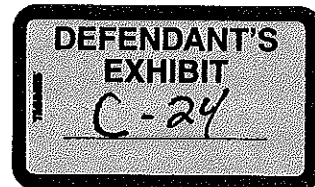
I truly hope that you will be able to consider the meaning of fairness and the protocols of international human rights as you make your decision. What she has already been through is more than any human being should have to endure – especially since her imprisonment in Israel was based on a forced confession. Now, she could lose her citizenship for an act she committed because of her PTSD (and her PTSD was excluded from her trial in Detroit in November 2014). Losing citizenship and deportation would destroy Rasmea because she will be taken away from her life line – her community work in Chicago. It would also devastate many Chicago communities who deeply respect her and rely on her leadership and skills for empowerment. To imprison Rasmea on top of this would only mean her destruction as a person and the destruction of a significant aspect of what makes life go on for many people in Chicago.

I request, in the most serious terms, leniency in the sentencing of Rasmea Odeh.

Respectfully yours,



Professor Anna Guevarra





**Chicago Alliance Against Racist & Political Repression**  
1325 S. Wabash Ave. Suite 105, Chicago, Illinois 60605 (312) 939-2750  
www.naarpr.org

February 9, 2015

◆ **Executive Committee**

Clarice Durham  
Ted Pearson  
Josephine Wyatt  
    *Co-Chairs*  
Willie Williamson  
    *Treasurer*  
Kevin Lindemann  
    *Rec'g Sec'y*  
Mike Siviwe Elliott  
    *Labor Committee*  
    *Chair*  
Frank Chapman  
    *Field Secretary,*  
    *Education Director*

◆ **Steering Committee\***

Jeff Baker  
    *Committee for a Better*  
    *Chicago*

Alejandro Barba  
Gloria J. Johnson-Ester  
Joe Iosbaker  
    *Committee Against FBI*  
    *Repression*  
    *Rasmea Odeh Defense*  
    *Committee*

Gregory Malandrucchio  
    *Victim of arbitrary brutal*  
    *beating by Chicago police*  
Crista Noël  
Larry Redmond  
    *Attorney at Law,*  
    *General Counsel*

Billie Rosman  
Judith Stuart  
    *Prison Medical*  
    *Project Coordinator*  
Cherese Williams  
    *Para-Legal*

*Cabrini-Green Legal Aid*  
Patricia J. Welch  
Sarah Wild  
Mildred Williamson

◆ **Organizing Committee to Stop Police Crimes\* (Includes Steering Committee)**

Khalid Abdullah  
    *National Jericho Movement*  
Bertha Escamilla  
    *Mother of Nick Escamilla,*  
    *police torture victim*  
Kamrn Howard  
    *N'COBRA*

Emmett Farmer  
    *Father of Flint Farmer,*  
    *murdered by Police*

Lewis Myers  
    *Attorney at Law*  
Jordan Rome

\*Organization affiliations listed for identification only

Honorable Judge Gershwin Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

Dear Judge Drain,

I am writing on behalf of our organization to request leniency in the March 12 sentencing of Rasmea Odeh, who we know as a friend, community leader, and staunch defender of the civil rights and civil liberties of her own people, and all people.

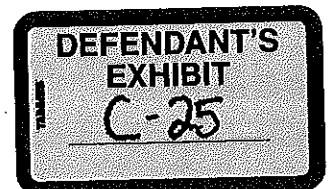
We first really got to know Ms. Odeh after she was arrested on what we believe to be false charges. After knowing her and witnessing her selfless dedication to human rights we became convinced that she was being singled out for persecution for political reasons. We have witnessed how she carries herself, and the love and respect she commands from thousands of Palestinian immigrants and their families, and thousands of other Americans. She is a woman we can all stand proudly for knowing. She is a true patriot, and she is a woman that the people can count on to do what is right in the defense of our basic human rights.

- In November 2014, Ms. Odeh was convicted of unlawful procurement of naturalization. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her. Simple human compassion alone in her sentencing will help serve justice and demonstrate that the State is not persecuting her for standing tall in this case.

- We are confident that her conviction will be overturned on appeal. Keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

- As a survivor of torture, her engagement for the betterment of her community in Chicago is critical to her physical and emotional health. The isolation she endured while incarcerated was may have retriggered her Post Traumatic Stress Disorder (PTSD).

UNITY + STRUGGLE + ORGANIZATION = VICTORIES!



- As a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens.
- If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term.
- Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

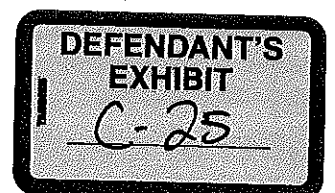
Again, on behalf of our organization, we urge you to exercise your humanity and lenience in sentencing Rasme Odeh on March 12, 2015.

Sincerely and respectfully yours,

  
Clarice Durham

  
Ted Pearson

  
Frank Chapman



UNIVERSITY OF CALIFORNIA, SAN FRANCISCO



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SANTA BARBARA • SANTA CRUZ

Jess Ghannam, PhD  
Clinical Professor  
Department of Psychiatry &  
Global Health Sciences

415 921 8096 (T)  
415 921 8095 (F)  
jess.ghannam@ucsf.edu

January 27, 2015

The Honorable Gershwin Drain  
Eastern District of Michigan Court  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit MI 48226

**RE: Rasmieh Odeh**

Your Honor:

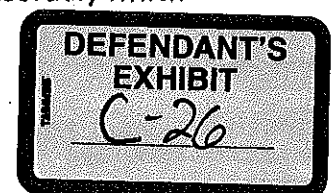
My name is Dr. Jess Ghannam and I am a Professor of Psychiatry at the University of California San Francisco where I have been on the faculty for some 25 years. I am writing you today, hoping for leniency in the sentencing of Ms. Rasmieh Odeh.

As you know, Ms. Odeh is a 67-year-old woman. She is the Deputy Director of the Chicago-Based Arab-American Action Network and has been in this country since 1994. This case has garnered national as well as international attention and more recently she was convicted of lying on her naturalization application in 2004. At that time she answered questions as to whether or not she was arrested, convicted or imprisoned in the negative.

I am sure, as you know, Rasmieh is considered a community leader and is well-respected and since coming to the United States she has consistently worked as an advocate for disenfranchised individuals in Chicago. She is seen by the Chicago community as an individual with the highest moral integrity and has worked to further the wellbeing of her community since she has been in the United States.

Her conviction of unlawful procurement of naturalization in November 2014 sent a ripple effect throughout the entire Arab-American community as well as communities of color throughout the United States. She was detained for a month immediately following the verdict including approximately three weeks in solitary confinement.

I am writing to you today in my capacity as a mental health expert who has worked with torture survivors from all over the world and especially survivors of torture from the Middle East, Africa and the Gulf regions. It is well-known within the community that Rasmieh has severe and significant posttraumatic stress disorder. This disorder, which



she has had even since she was in her 20s, has been a lifelong chronic illness, which she has endured and suffered throughout the bulk of her adult life.

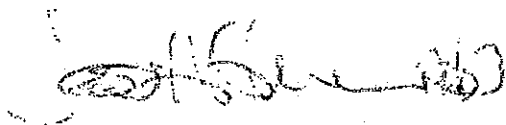
The court proceedings as well as her recent time in jail have exacerbated her posttraumatic stress disorder, causing her to re-experience these symptoms including ongoing nightmares, severe anxiety, depression and a decline in her psychological and behavioral health. Being in the United States and being a citizen that is contributing to the well-being of her community, has been taken from her at this time. While in isolation she continued to decline in her physical and mental health and re-experience severe symptoms of PTSD.

Since there is a possibility of her conviction being overturned on appeal, I am asking you to please consider keeping her out of prison and allow her to be a contributing and productive member of her community and of our society. Having dedicated her life for the last 20 years to serving these communities and the United States, this is a loss for the communities of the Greater Chicago area and beyond. In addition, for Rasmieh to be held pending appeal most certainly will exacerbate her very severe symptoms of posttraumatic stress disorder, causing significant and severe decompensation in her already-fragile psychological state.

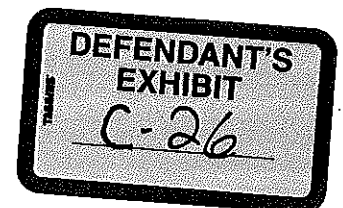
Given your history of compassion at rulings over your lifetime on the bench, Your Honor, I am asking you to take into consideration the fact of her age, being 67, and the fact of her significant suffering from posttraumatic stress disorder, which is having and exerting a great negative impact on her already-fragile condition. In my experience, having worked with individuals in this position over the last 25 years, I can tell you that Rasmieh's condition will only deteriorate further unless you allow her to stay free pending her appeal.

We are asking for your consideration in this matter.

Very respectfully,



Jess Ghannam, PhD.  
Professor of Psychiatry  
University of California San Francisco





475 14<sup>th</sup> Street, Suite 800  
Oakland, CA 94612  
6. February.2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as remarkable community leader. My name is Tracy Benson and I work for the Community Justice Network for Youth (CJNY). CJNY is a national network of over 150 community based organizations that work with children and families impacted by the juvenile justice system. We stand in solidarity with Rasmea Oden and her legacy of service and advocacy. Prior to CJNY, I worked for Freedom Inc, a Southeast Asian and African American organization in Madison, WI that does anti-violence against women work.

I know of Rasmea and her great work through a trusted, long time member organization, the Arab American Action Network. Rasmea and AAAN's work has been critical in supporting immigrant women and families across Chicago and beyond. Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members.

Having worked with Southeast Asian refugee women for over a decade, I know how critical the support is that Rasmea has provided to families coming to the US from countries facing war and political crisis- like Iraq, Palestine, Yemen, Syria, and beyond. These women now have a place to seek support, gain empowerment and community, and call their home. Rasmea is truly an asset to the Chicago community, a person to be honored and cherished, not punished and ridiculed.

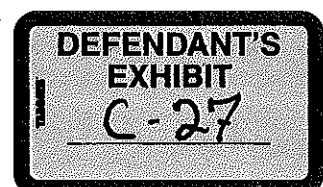
If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term. Such punitive measures will not serve anyone justice and would cause much more harm than good.

Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community. The community has shown in overwhelming numbers that we support Rasmea. We are counting on you your Honor, to make the best decision for Rasmea, her family, and for the broader community.

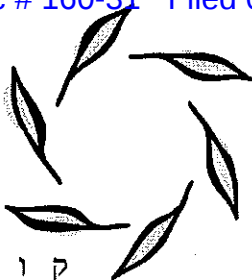
Respectfully yours,



Tracy Benson  
Regional Manager  
Community Justice Network for Youth  
W. Haywood Burns Institute



# Jewish Voice for Peace



קו ל יהודי לשלום

## Jewish Voice for Peace-Chicago

PMB 206 2906 Central St. Evanston, IL 60201 312-409-4845  
chicago.jvp.org info@jvpchicago.org

February 4, 2015

Honorable Judge Gershwin Drain:

I am writing to urge leniency from you in the March 12 sentencing of Rasmea Odeh. As a long-time leader of a Jewish organization (jvp.org) that advocates for a just peace for Israelis and Palestinians, I value Rasmea and her organization and the partnership that we have enjoyed in this work. Over the years, we have come to truly admire Rasmea's warmth, compassion and selfless leadership.

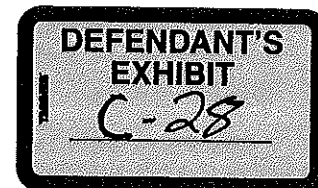
Just this summer, I had the pleasure of attending a meeting of seven prominent women who were planning a Chicago woman's conference. Rasmea was there and I truly admired the way that -- in the midst of her own crisis -- she focused solely on the needs of the women immigrants who she helps to adjust to life in America.

Should Rasmea not win her appeal, Jewish Voice for Peace will lose a valuable partner in our work for a just peace. Some 600 women in Chicago will lose someone who plays a central role in their lives.

As a survivor of torture, Rasmea has suffered enough. I urge you to keep Rasmea in her community, engaged in the work that is so important to her emotional health.

Respectfully yours,

Lynn Pollack



Lynette A. Jackson, Ph.D.

February 4, 2015

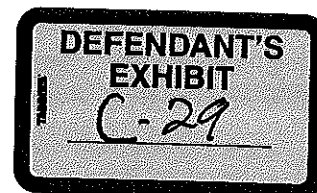
Honorable Judge Gershwin Drain,

I am writing this letter to appeal to you to show leniency in your March 12 sentencing of Rasmea Odeh. I have known Ms. Odeh as a community activist and valuable member of the greater Chicago community for many years. I am a Professor of African history and Gender and Women's Studies at the University of Illinois at Chicago. Over the years, I have become familiar with the work that Ms. Odeh performs for Chicago's immigrant and refugee communities and for the Arab American women's community. As a long-time activist - in the Anti-Apartheid Movement back in the 1980s, African, African American and transnational feminist movements, the LGBTQ rights movement, the immigrant and refugee rights movement and the Palestinian Rights movement, I have a strong appreciation for Rasmea Odeh's work as a community leader and champion for the downtrodden in Chicago.

As I have become more aware of Rasmea's personal story, her very difficult history as a refugee, prisoner and survivor of torture in Israeli jails, I feel very strongly that she should receive mercy and compassion. Specifically, I am requesting that you, the presiding judge, will find it in your heart to show leniency in your sentencing of her. She, a frail 67 year old woman who, for many years served as a voice for multiple marginalized communities in Chicago, spent three weeks in solidarity confinement in a cold, damp cell in the St. Clair County Jail. She is being threatened with deportation to a place where her rights will not be respected, and where she has not lived for many decades. Rasmea is an exemplary member of the Chicago community and I pray that you will find it in your heart, motivated by the pursuit of justice, to show leniency in her sentencing.

Respectfully yours,  
Lynette A. Jackson

Lynette A. Jackson, Ph.D.  
Associate Professor  
Gender and Women's Studies, African  
American Studies and History  
PI of Diaspora Studies Cluster  
601 South Morgan Street, 1230 UH  
University of Illinois at Chicago  
Phone: 312-413-2457





Council on American-Islamic Relations  
Chicago Office  
17 N. State Street, Suite 1500, Chicago, IL 60602  
Tel 312.212.1520 Fax 312.212.1530 [cairchicago.org](http://cairchicago.org)

Ahmed Rehab, Executive Director  
Council on American-Islamic Relations, Chicago office (CAIR-Chicago)  
17 N. State Street, Suite 1500  
Chicago, IL 60602

February 6, 2015

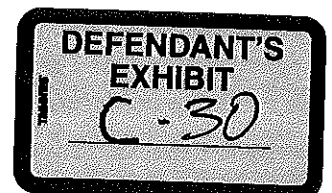
**RE: Request for Leniency  
USA v. Odeh, CR-2:13-20772**

Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 10 sentencing of Rasmae Odeh, who I know as a community leader in Chicago.

Ms. Odeh is a dedicated and outstanding advocate for immigrant women in Chicago. She created the Arab Women's Committee, which has been nationally recognized as a successful model for the assimilation of Arab female immigrants into large urban communities. She has strong family ties and has developed a large group of friends, allies and community partners during the past years in Chicago, who have come to know her as a gentle, compassionate and caring individual.

- In November 2014, Rasmae was convicted of Unlawful Procurement of Naturalization. I am asking for compassion in her sentencing, as the only way to serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her.
- As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD).
- As a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens.
- If Rasmae loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term.

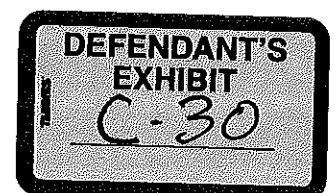


- Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of refugee women in Chicago's Arab and Muslim community.

Sincerely,



Ahmed Rehab  
Executive Director



**James & Grace Lee Boggs Center to Nurture Community Leadership**

**[www.boggscenter.org](http://www.boggscenter.org)**

**3061 Field Street, Detroit, MI 48214**

**313-923-0797**

**February 16, 2015**

**Honorable Judge Gershwin Drain,**

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know to be an outstanding community leader. My name is Richard Feldman and I am a board member of the James and Grace Lee Boggs Center to Nurture Community Leadership. The Boggs Center's mission is to nurture the transformational leadership capacities of individuals and organizations committed to creating productive, sustainable, ecologically responsible, and just communities.

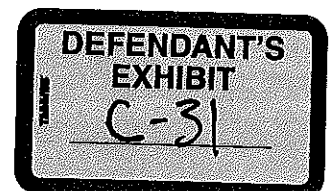
In addition, the Boggs Center is committed to supporting the work of aging activists, including our co-founder Grace Lee Boggs, who is a 99 year old philosopher and writer. Similarly, Rasmea has spent the majority of her life working to uplift communities, in particular through her recent decade of work with immigrant women in Chicago. She founded the Arab Women's Committee which does important work that embodies Martin Luther King Jr's definition of the "Beloved community". It is imperative that she is able to continue to contribute in a multitude of ways that transform hundreds of women's lives in Chicago and beyond.

I am writing to ask for empathy in your sentencing of Rasmea as a 67-year old woman who has given so much throughout her long life. It will be a huge detriment to her health if she is incarcerated again, considering that almost all prison facilities will be lacking medical services and accommodations to provide care for senior citizens. It will also be a huge loss to her communities in Chicago, Detroit, and beyond who are positively impacted by her collective approach to addressing the needs of the most vulnerable community members.

Thank you for your careful and compassionate consideration of leniency for Rasmea Odeh.

Richard Feldman, Sharon Howell

James and Grace Lee Boggs Center to Nurture Community Leadership



Arab American Anti-Discrimination Committee, Chicago Chapter  
Chicago, Illinois

February 2, 2015

Honorable Judge Gershwin Drain,

On behalf of the Arab-American Anti-Discrimination Committee, Chicago Chapter, I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who we know as community leader. Founded in 1980, the American-Arab Anti-Discrimination Committee (ADC) is the largest Arab American grassroots organization committed to protecting civil rights, promoting mutual understanding, and preserving the Arab American cultural heritage.

Rasmea Odeh has been a long-time community leader who has worked tirelessly for immigrants, women, and the under-privileged, not just in her community but for all those in Chicago. Most of us on the ADC Chicago Board have known and respected Ms. Odeh for many years, and throughout that time she has always shown a sense of caring for all those she has come in contact with.

She is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises now have a place to gain empowerment and community, and call home.

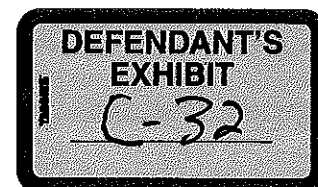
After the court ruling in November 2014, Ms. Odeh was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her. As a survivor of torture in the past and now a 67 year old woman, the recent incarceration in the St. Clair County Jail was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD). We feel compassion in her sentencing will serve justice in this case, and urge you to please consider leniency.

If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting her ties with family and community in Chicago. This punishment alone is so devastating, we hope that it would not be compounded by adding a prison term.

Also, keeping her out of prison during her appeal would allow her to continue as a contributing and productive person, during the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Respectfully yours,

Abder Ghouleh  
ADC Chicago Board Member



Loren D. Lybarger  
5807 S. Dorchester Avenue, Apartment 7F  
Chicago, IL 60637

January 15, 2015

Judge Gershwin Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

The Honorable Judge Gershwin Drain:

I write to request leniency in the pending March 12 sentencing of Rasmea Odeh. I am an associate professor of Classics and World Religions at Ohio University currently on research leave at the Martin Marty Center for the Advanced Study of Religion at the University of Chicago.

I have known Rasmea for nearly a decade. In 2011, I interviewed her about her work with Arab immigrant women for a book I am writing on Chicago's Palestinian community. During that interview and in multiple subsequent interactions, Rasmea has facilitated further interactions with some of the women who participate in her program. These women demonstrate deep love and respect for Rasmea, invariably describing to me how Rasmea has enabled them to gain a foothold in Chicago as they undergo the difficult process of starting new lives in the United States.

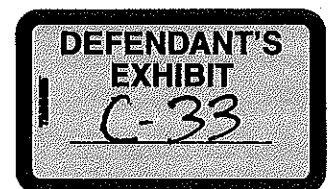
Rasmea is a 67-year-old woman who has had to endure torture in Israeli military prisons and nearly a month of punishing solitary confinement in the St. Claire County jail following her conviction in November 2014 on a charge of unlawful procurement of naturalization. She suffers from post-traumatic stress disorder. Further incarceration will only serve to traumatize her further. Should Rasmea lose her appeal, she might well be stripped of her US citizenship and forced to undergo deportation, an event that will destroy the life she has worked so hard to build in Chicago. Deportation will be punishment enough. Her appeal, however, might succeed, so I ask that she be allowed to remain free to live and work in Chicago, continuing to provide important leadership to the women she has done so much to help.

Regardless of her conviction, Rasmea has proven to be an exemplary citizen, winning awards for her work in Chicago. She has suffered enough. Does not society have a countervailing interest in helping immigrants to establish strong institutions and productive lives? The law must be served, but there are also considerations of mercy and recognition of a larger social good that should temper how we choose to enforce legal strictures.

I urge you to consider leniency in the sentencing of Rasmea Odeh.

Respectfully,

Loren D. Lybarger







February 5, 2015

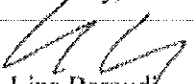
Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmia Odeh, who I know as a community leader and ally. I am the immigration attorney at the Arab Resource and Organizing Center's Arab American Legal Services in San Francisco, California, and have a long history of community involvement and activism through AROC, its predecessor (the American-Arab Anti-Discrimination Committee of San Francisco), and the Arab Women's Solidarity Association of San Francisco.

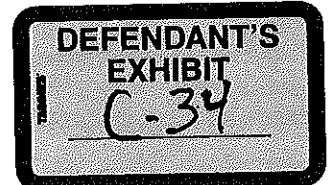
As an Arab-American immigration attorney who has assisted hundreds of clients in naturalization applications, all of whom did not speak English as a first language, Ms. Odeh's case has been of great interest to me personally and professionally. Based on first-hand experience, I can represent to the Court that the majority of naturalization applicants misunderstand the question on the application for naturalization relating to prior arrests and convictions – almost all of my clients understand the question as being exclusive to a criminal history in the United States. This is understandable because other immigration applications, such as the application for asylum, specifically ask whether the applicant has a criminal history in "any country other than the United States." Similarly, the application for adjustment of status (for a green card) asks whether the applicant has a criminal history "in or outside the United States." As demonstrated by Ms. Odeh's case, it is a common, understandable, and devastating mistake. In fact, since this case, I have been even more diligent in advising clients that, despite its vagueness, the application for naturalization is requesting information about their criminal history outside of the U.S. as well as within.

Your Honor, I have also represented innumerable clients who have suffered torture and severe persecution, including multiple Palestinians who endured indescribable sexual and physical abuse in Israeli prisons based on extremely questionable arrests and convictions within the Israeli judicial system. From my personal experience, I know that interaction with any law enforcement, as well as further incarceration, in the United States re-traumatizes these victims. As I have seen with my own clients, I strongly believe that the isolation Ms. Odeh withstood while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder. As with other survivors of torture, Ms. Odeh's continued engagement with her community – the people who rely on her – is critical to her emotional well-being. I respectfully urge you to consider allowing her to continue being a productive and respected community leader who has so generously devoted her energy and time to hundreds of Arab and Muslim immigrant and refugee women in Chicago.

Sincerely,

  
Lina Baroud  
Attorney at Law

[lina@araborganizing.org](mailto:lina@araborganizing.org)





# SASHA CENTER

SEXUAL ASSAULT SERVICES FOR  
HOLISTIC HEALING AND AWARENESS

Saturday, February 14, 2015

Honorable Judge Gershwin Drain,

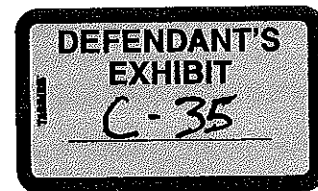
I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as an outstanding community leader. MY name is Kalimah Johnson and I am the founder of the SASHA Center in Detroit, Michigan. SASHA CENTER is a sexual assault service, prevention and educational agency which is designed to provide educational/support groups to survivors of sexual assault.

I am writing this letter as a survivor of assault and an advocate of change. Rasmea Odeh has constantly strived to better her community and has a 50 year history of supporting survival in urban settings. Our great country was built of the supporting and assistance of refugees. I couldn't image anything more un-American than Rasmea losing her appeal and possibly facing the loss of her citizenship and deportation. Her influence and impact has had a profound effect on those around her as well as those who know her story. I am asking for compassion in this appeal. As a survivor advocate, I have seen the negative and deteriorating effects of forced solitude and isolation away from familial and community ties. To take Rasmea out of her community would be like leaving a gaping wound unattended. As an award winning community leader, she has created institutions that have become a safe haven to those coming into this country who lack empowerment, confidence and security. IT is my hope that as my work continues I may have at least half the impact that her presence has had.

Thank you for your careful and compassionate consideration of leniency for Rasmea Odeh. Her community needs her and our world needs more women like her.

Healing is Possible!  
Kalimah Johnson, LMSW, ACSW, LCSW  
Executive Director/Founder

**SASHA Center, INC.**  
[www.sashacenter.org](http://www.sashacenter.org)  
313-214-2083  
888-865-7055



Bro. Brian McLaughlin, SVD  
832 Varnum St. NE  
Washington, DC 20017

January 28, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a community leader in Chicago. She has been very much involved with the Arab American Action Network (AAAN) and she collaborated with us when I was at the 8th Day Center for Justice, a Catholic organization that works toward social change.

Ms. Odeh is a very respected member of the activist community. If she were taken from the community, she would be sorely missed by many people. She has worked tirelessly at the AAAN and has done much in terms of education and giving a voice for oppressed members of our society.

In November 2014, Rasmea was convicted of Unlawful Procurement of Naturalization. Compassion in her sentencing will serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her.

If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term.

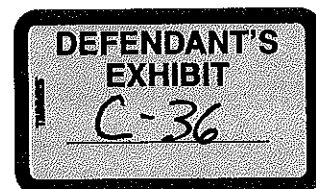
Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

Again, I ask that you please have leniency toward Rasmea Odeh in her March 12 sentencing.

Respectfully yours,

Bro. Brian McLaughlin, SVD



Rebecca Sanders  
3027 W. Eastwood Avenue  
Chicago, IL 60625

February 4, 2015

Dear Honorable Judge Gershwin Drain,

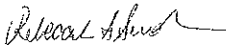
I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, whom I am fortunate to know through my work with the Arab American community in Chicago. For six years, I served as the Executive Director of the Chicago Cultural Alliance (CCA), a consortium of Chicago area ethnic museums and cultural centers with a mission of building cultural understanding across communities; the Arab American Action Network is one of the founding members of CCA. Though I no longer serve as the CCA's executive director, I remain deeply committed to supporting the communities I represented at CCA, and I am connected to many of these communities through both my professional, volunteer, and civic roles.

Rasmea is a dynamic and warm person, revered for her quiet and steadfast leadership - both within her community and beyond. She has forged positive, meaningful relationships among Chicago's diverse communities, and the leaders of the Chicago Cultural Alliance's membership selected Rasmea for one of two 2013 Outstanding Community Leader Awards for this commitment. I met Rasmea early in my tenure at the Chicago Cultural Alliance. She is a warm leader and revered in her community for her care and leadership. She is not only a trusted role model for Arab and Muslim women, but for women across immigrant and underserved communities. The City of Chicago is a better place because of her contributions, and, while I cannot comment on the specifics of her case, I strongly believe that a prison sentence will achieve nothing positive for the State or the community.

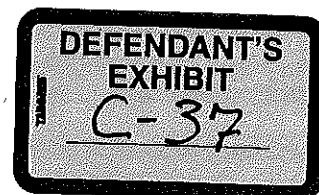
Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the United States from countries facing war and political crises - like Iraq, Palestine, Yemen, Syria, and beyond - now have a place to seek support, gain empowerment and community and call their home. The incarceration of Rasmea would be a painful and substantive loss for these women.

Thank you for your consideration and review of my letter. I appreciate your compassion in Rasmea's case.

Respectfully yours,



Rebecca A. Sanders



Naomi Wallace  
561 10th Ave  
New York, NY 10026

February 5/2015

Honorable Judge Gershwin Drain,

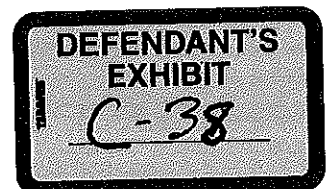
I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I have been reading about and following for some time now. Rasmea has been an important award-winning leader in the bettering of her community for decades now.

I am myself an award-winning playwright and screenwriter and member of the dramatists guild. My own work for film and theater has lead me to study and amplify those important workers in our community who have stood up for justice and protection for the most vulnerable. Rasmea's work is critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Myself and fellow playwrights beg you to grant leniency to Rasmea Odeh.

Yours sincerely,

Naomi Wallace  
[http://en.wikipedia.org/wiki/Naomi\\_Wallace](http://en.wikipedia.org/wiki/Naomi_Wallace)





AMERICAN MUSLIMS FOR PALESTINE

**EMPOWERMENT** through  
**EDUCATION** and **ACTION**

American Muslims for Palestine  
10101 S. Roberts Road  
Palos Hills, IL 6-465

February 9, 2015

Honorable Judge Gershwin Drain:

As an organization that advocates for human rights and social justice, the American Muslims for Palestine (AMP) has worked with Rasmea Odeh for many years. Chicago activists are a tightly knit community and we very often work on the same issues and attend the same events. It is in this capacity that I and several members of this organization have known Rasmea for several years. Therefore, I am writing to request mercy for Rasmea during her March 10, 2015 sentencing.

Rasmea is a beloved member of our community. We have a great deal of respect for her and the work she has done to help thousands of immigrant women to assimilate to their new homes in the United States. We have seen Rasmea help dozens of women from our communities to learn English, and to find resources so they can establish themselves as productive members of our society.

As Rasmea appeals her November 2014 conviction, we are asking you for mercy for the 67-year-old by allowing her to remain out of prison during the appeal process. When Rasmea was incarcerated immediately after her conviction, she spent three weeks out of four in solitary confinement. This was a major hardship for her; she lost at least 15 lbs., and began suffering from her diabetes and a back ailment. The isolation caused the Post Traumatic Stress Disorder, the result of brutal torture she endured in Israeli prison, to once again haunt her. The Chicago community offers Rasmea broad support, which is crucial to her emotional and physical health.

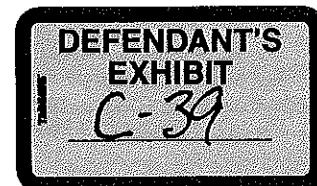
If Rasmea loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by incarcerating her during the appeal process.

Dear Judge Drain, we at AMP are appealing to you sense of mercy, compassion and justice by asking you to allow Rasmea to remain free during her appeal process. Society would be better served by allowing Rasmea to continue her work to help immigrant women find their place in the fabric of American life.

Thank you for your time and consideration of our request.

Respectfully yours,

Nida Sahouri  
AMP-Chicago Chairwoman



Sara Kershner  
P.O. Box 29724  
Oakland, CA 94604

February 8, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmia Odeh, who I know as a deeply respected and relied on community leader. As a American Jewish activist and member of California Coalition for Women Prisoners, Rasmia's work and commitment has inspired and been a compass in my work on peace and justice in Palestine and civil and human rights more broadly.

Rasmia is someone who deserves the appreciation and respect of the people and the government of the United States. She is a recognized leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmia's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

As a founder of Generation Five, an organization dedicated to preventing and responding to child sexual abuse, and one-time board member of the San Francisco Women Against Rape, I am very familiar with Post-Traumatic Stress Disorder. One of the most common experiences of those who have experienced the kind of trauma that Rasmia did as a survivor of torture and rape by the Israeli military is to compartmentalize information, memories and experiences. It is not at all surprising to me that when asked on her naturalization forms whether or not she was ever incarcerated that she replied "no." It would not be uncommon for someone with a traumatic memory of detainment to block a question that may force blocked or compartmentalized memories of profound trauma to the surface.

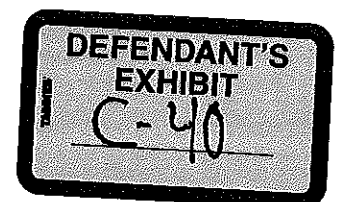
As a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens. Furthermore, I know from my work that one of the most important components of healing from such trauma is the ability to help others who have experienced similar experiences. Her work on behalf of her community is not only essential to those she serves, but also for her health and well-being.

If Rasmia loses her appeal, she will likely lose her citizenship and face deportation. This will end life as she knows it, cutting all her ties with family and community in Chicago. This punishment alone is so devastating, it should not be compounded by adding a prison term. Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Please do the right and compassionate thing and grant Rasmia Odeh leniency.

Respectfully yours,

*Sara Kershner*



February 9, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency in your sentencing of Ms. Rasmae Odeh on March 12th. I came to know of Ms. Odeh in her work with the Arab American Action Network, (AAAN) and her reputation as a respected community leader in Chicago. AAAN is a member organization of the Illinois Coalition for Immigrant and Refugee Rights (ICIRR), a statewide immigrant advocacy organization of which I am the executive director.

While I do not know Ms. Odeh very well on a personal level, many people that I hold in high regard have the utmost respect for her, her work, and the many people she has touched through her service. Her contributions go beyond the Arab and Muslim communities. She has influenced the broader immigrant rights, women's rights, and social justice movements in Chicago.

ICIRR has partnered with AAAN for over a decade not only for the push for immigration reform and immigrant-friendly state policies, but also to inform communities about a range of issues from the Census, to health care, to citizenship. Ms. Odeh has played a significant role in the partnership. Her accomplishments are directly related to the trust and respect she earned through many years of serving, caring, and simply being there for program participants and people who needed her.

Ms. Odeh has overcome many setbacks earlier in her life, and endured unspeakable things including torture. Rather than becoming another statistic, she chose to dedicate the past 50 years of her life to serving refugees wherever she has lived. And, because of Rasmae's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

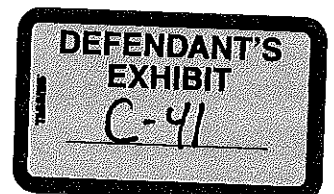
I hope these decades of service are not lost upon your deliberations in her case.

Thank you for your consideration.

Sincerely,



Lawrence Benito  
1454 E. 63rd St.  
Chicago, IL 60637





January 21, 2015

The Honorable Judge Gershwin Drain  
Theodore Levin U.S. Courthouse  
21 W. Lafayette Blvd., Room 123  
Detroit, MI 48226

RE: U.S. v. Rasmea Odeh

Dear Judge Drain,

My name is Khalil Meek, the current Executive Director and one of the co-founders of the Muslim Legal Fund of America since 2001. Today, I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as community leader.

I know Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

I strongly support her mission to put a human face on Palestinians so the public will come to know them as people with the same aspirations, hopes and dreams for freedom and justice that we as Americans hold dear.

To me she has been a role model who has a passion for helping others. She genuinely cares for people. She would never hesitate to do something good for others. Ms. Odeh is always talking about hope, peace and good will towards others. She lives by example. Rasmea is a warm, loving, thoughtful person who has never hurt or harmed anyone. She is a good hearted, God conscious humanitarian.

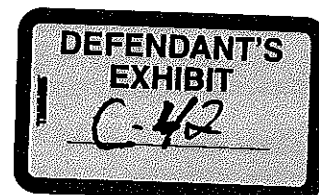
I pray for your Honor to be compassionate, merciful and lenient in your sentencing of Rasmea.

Thank you for your consideration.

Respectfully yours,

*Khalil Meek*

Khalil Meek  
National Executive Director  
Muslim Legal Fund of America  
833 E. Arapaho Road # 209  
Richardson, TX 75081



**CHICAGO COMMITTEE TO DEFEND THE BILL OF RIGHTS**

**1325 S. Wabash Avenue  
Chicago, IL 60605**

26 January 2015

Judge Gershwin Drain  
U.S. Courthouse  
231 W. Lafayette Blvd.  
Detroit, MI 48226

Re: RASMEA ODEH

Dear Judge Drain,

Rasmea Odeh's release on bail was a very positive step. And of course she has complied fully and faithfully with conditions.

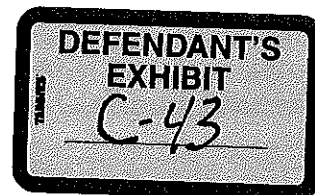
Now I want to urge leniency in sentencing. Rasmea is such an admired figure in Chicago, and has done so much for immigrant women and others in need, that her public record of service seems heavily to outweigh the relatively technical offenses for which she has been convicted.

We also believe that there are unaddressed issues of free expression and selective prosecution in the case that could be taken into account at this stage.

Given her health status and admirable struggle to make the world a better place, we hope she could be considered to have served already any incarceration time warranted.

Sincerely,

Robert Clarke  
President





February 4, 2015

**COMMITTEE FOR  
A JUST PEACE  
IN ISRAEL  
AND PALESTINE**

1044 Gunderson  
Oak Park, IL 60304  
www.cjpip.org

**STEERING  
COMMITTEE**

**CAREN LEVY  
VAN SLYKE**  
*Chair*

**JANET SETTLE**  
*Secretary*

**REBEKAH LEVIN**  
*Treasurer*

**JENNIFER  
BING**  
*Program Coordinator*

**GERRI BRAUNEIS**  
*Legislative Liaison*

**MARSHA LOVE**  
*Outreach  
Coordinator*

Honorable Judge Gershwin Drain,

On behalf of the Committee for a Just Peace in Israel and Palestine (CJPIP) in Oak Park, Illinois, I am writing to request leniency in the March 12<sup>th</sup> sentencing of Rasmae Odeh. Ms. Odeh is a compassionate leader and role model in human rights, who has dedicated her life to serving refugees who have endured harsh and brutal conditions in their home countries.

As a Chicago-area organization which promotes human rights in Israel and Palestine, CJPIP has long appreciated Ms. Odeh's remarkable work in Chicago with the Arab Women's Committee. Because of her commitment and indefatigable efforts, immigrant and refugee women who have fled war-torn countries in the Middle East can live in the U.S. in a community where they feel supported and can rebuild their lives. While there are others who do this essential work, those who know Rasmae recognize that her contributions are exceptional.

One of the reasons for her effectiveness is that Ms. Odeh has first-hand knowledge of these women's' experiences, both in their native countries and as immigrants. Additionally, her natural empathy has been enhanced through her personal suffering both as a past survivor of torture and most recently in her confinement in the St. Clair County Jail.

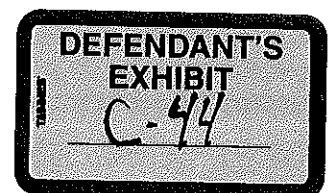
In fact, the conditions in the jail have compromised her physical and emotional health, and she needs every opportunity to be able to recover her strength.

We fervently hope that justice will prevail and that Ms. Odeh will be able to successfully appeal her conviction. We know that allowing her to remain in her community as her case proceeds through the courts would allow her to continue her invaluable work to empower hundreds of women in Chicago's Arab and Muslim community.

Thank you for considering this matter.

Sincerely,

Caren Levy-Van Slyke  
Chair, Committee for a Just Peace in Israel and Palestine



Imam Jamal Said  
Mosque Foundation  
7360 W. 93<sup>rd</sup> Street  
Bridgeview, IL 60455

January 27, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a community leader our community know well. I have known Rasmea and can attest to her positive characters and valuable contributions to her community.

Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

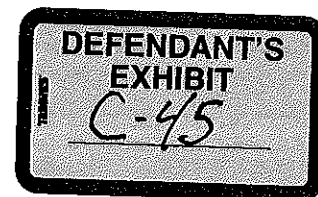
Rasmea was convicted of Unlawful Procurement of Naturalization. Compassion in her sentencing will serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her.

As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD).

Also, as a 67-year old woman, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens.

Respectfully yours,

Imam Jamal Said,  
Principal Imam & Director



LAW OFFICE OF

**STANDISH E. WILLIS, LTD.**

29 E. MADISON STREET • SUITE # 1802  
CHICAGO, ILLINOIS 60602

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TELEPHONE (312) 750-1950

FACSIMILE (312) 750-1958

SWILLIS818@AOL.COM

Honorable Judge Gershwin Drain  
United States District Judge  
U.S. District Court for the Eastern District of Michigan  
231 West Lafayette Street  
Detroit, Michigan 48226

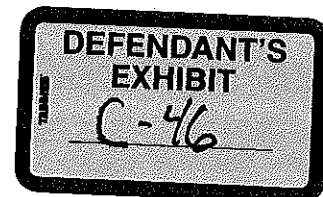
February 3, 2015

Re: United States v. Rasmea Odeh, Cr. 2:13 CR 20772

Dear Judge Drain:

A brief introduction is in order. I am an attorney in the City of Chicago specializing in criminal defense and federal rights cases. I am a member of The National Conference of Black Lawyers, The Cook County Bar Association, The National Lawyers Guild, The Illinois Bar Association and The Chicago Bar Association. My legal experience includes several years in private practice concentrating in state and federal criminal defense and federal civil rights litigation. During the course of my legal practice, I have tried many federal and state jury trials. I have also argued many cases before the Seventh Circuit Court of Appeals. Moreover, I have litigated dozens of civil rights lawsuits against many municipalities involving dozens of public officials. In 2002, I was honored to be named one of the "30 Tough Lawyers" by The Chicago Magazine.

I have been a faculty-lecturer for the annual civil rights seminar sponsored by the Illinois Institute for Continuing Legal Education (ICLE) and The Chicago Kent College of Law in the area of Section 1983 Civil Rights Liability and Litigation. I also maintain an active public speaking schedule on issues related



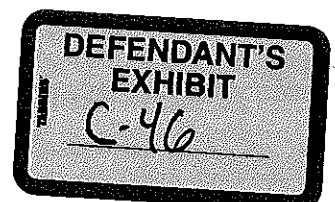
to the criminal justice system, the death penalty, police brutality, community-control of police, the prison-industrial complex, The mass incarceration of Black Men and Women, America's political prisoners, racism and the American legal system, and International Human Rights.

In September 2001, I was a member of the Durban 400, a group of African- Americans who participated in the United Nation's Conference on Racism held in Durban, South Africa. The Durban 400 successfully lobbied the United Nations to resolve that the Atlantic Slave Trade was a crime against Humanity.

During the summer of 2005, I joined a group of lawyers and community activist in an effort to focus international attention on police torture in Chicago. In September 2005, I presented evidence of police torture before the Organization of American States' Inter-American Commission on Human Rights. In May 2006, the UN Committee Against Torture sharply criticized the US for failing to bring the officers responsible for torture in Chicago to justice and called for a criminal prosecution in these cases.

During the summer of 2006, I co-chaired a group called Black People Against Police Torture "BPAPT", a grass-root, community based organization whose missions were to mobilize the African-American Community to insure justice in the Chicago police torture cases, and to build a Human Rights movement within the Chicago community. In February 2008, I presented evidence of police torture before the United Nations Committee to Eliminate Racial Discrimination "CERD" in Geneva, Switzerland. Upon my return from Geneva, BPAPT held town-hall meetings to report back to the community about how this trip helped advance the Human Rights Movement in the United States.

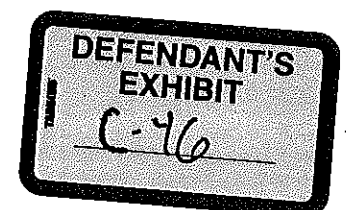
In January 2009, I drafted a bill titled "The Illinois Torture Inquiry and Relief Commission Bill." The Torture Commission, comprised of eight civilians, would have the authority to review the cases of those torture victims who remained in prison. BPAPT took two busloads of community activists to Springfield, Illinois to educate legislators about the Torture Bill, and held several town-hall meetings to educate the community about the legislation. On August 10, 2009, the Torture Bill was signed into law.



In April, 2010, I submitted a Report on "COINTELPRO Political Prisoners in the United States" to the United Nations as part of its Universal Periodic Review of the United States. The US was scheduled for review on November 5, 2010 in Geneva, Switzerland of its Human Rights compliance or lack thereof. More recently, I filed a Stake-Holder's Report to the U.N. Committee against Torture related to police torture in Chicago.

Judge Drains, I am writing you to urge leniency in the March 12, 2015 sentencing of Ms. Rasmea Odeh. Ms. Odeh has a reputation as a respected community leader in the Chicago Metropolitan Area. I am aware of the great work of the Arab American Action Network (AAAN) in the Chicago Area. Rasmea has served as the associate director of the AAAN since 2004. Sixty-six year old Rasmea Odeh is a Palestinian-American feminist, educator, activist and community leader. For the past 10 years, Ms. Odeh has built unprecedented community support for close to 600 Arab immigrant women on issues related to English literacy, gender violence, inter-generational cultural conflicts, racial profiling, immigrant rights, and access to social and economic resources. She has established community-wide education projects related to civil and human rights, social justice, and community economic development and workshops that allow Arab immigrant women to tell, write, and perform their immigration stories while improving their writing skills. In 2013, Rasmea received the "Outstanding Community leader Award" from the Chicago Cultural Alliance, which described her as a woman who has dedicated over 40 years of her life to the empowerment of Arab women, first in her homes of Palestine, Jordan, and Lebanon, where she was an activist and practicing attorney, and then the past 10 years in Chicago."

Your Honor, I further urge this Court to take into account that between 1969-1979, Rasmea Odeh served ten years in an Israeli prison. Her sentence was based on a confession she made in the midst of 45 days of sexual and physical torture while in detention. Following her release, she was exiled from her Palestinian homeland and eventually immigrated to the United States from Jordan in 1994 as a legal resident where she tried to put her memories of torture behind her. She later became a naturalized citizen.



It is my hope that Your Honor will consider, at the sentencing in this matter, Rasma's claims of torture in that the right not to be tortured is one of many human rights, but it is stronger than almost any other human right because the prohibition of torture is absolutely nonderogable and because the law recognizes no exceptions. What this means is that no one-ever, anywhere-has a "right" to torture, and that everyone-always, everywhere-has a right not to be tortured. It also means that anyone who engages in or abets torture is committing a crime. In the words of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984), "No exceptional circumstances whatsoever, whether a state of war or a threat of war, internal political instability or any other public emergency, may be invoked as a justification for torture."<sup>1</sup>

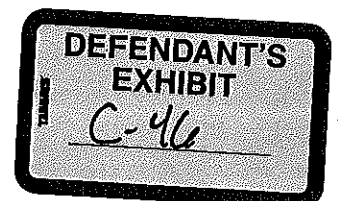
Finally, I urge and recommend the following:

I. A Non-Incarceration Sentence in consistent with The Intent of the Sentencing Reform Act of 1984

In enacting the Sentencing Reform Act of 1984, Congress intended that "prison resources [would be], first and foremost, reserved for those violent and serious criminal offenders who pose the most dangerous threat to society," and that "in cases of nonviolent and non-serious offenders, the interests of society as a whole as well as individual victims of crime can continue to be served through the imposition of alternative sentences, such as restitution and community service." See Pub. L. No. 98-473, §§ 217(a), 239, 98 Stat. 1987, 2039 (1984). Congress thus instructed the Commission to ensure "that the guidelines reflect the general appropriateness of imposing a sentence other than imprisonment in cases in which the defendant is a first offender who has not been convicted of a crime of violence or an otherwise serious offense," and the "general appropriateness of imposing a term of imprisonment on a person convicted of a crime of violence that results in serious injury." 28 U.S.C. § 994(j).

Congress believed that larger fines, probation with conditions, and alternatives to all or part of a prison term such as community service or intermittent confinement should be used more often, and that it would be up to the judge to determine whether the purposes of sentencing would best be served by

<sup>1</sup> Hajjar, Lisa, "Torture and the Future," Middle East Report Online (May 2004), available at [http://merip.org/mero.org/interventions/hajjar\\_inter.html](http://merip.org/mero.org/interventions/hajjar_inter.html).



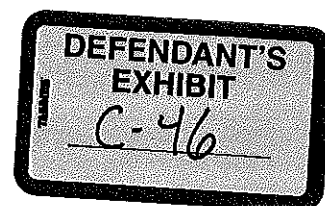


probation or imprisonment, except that imprisonment was not appropriate to achieve the purpose of rehabilitation. S. Rep. No. 98-225, at 50, 59, 92, 119 (1983); *See* 18 U.S.C. § 3582(a). Congress thus authorized judges to impose probation for most offenses, *i.e.*, any offense with a statutory maximum below 25 years unless expressly precluded for the offense, *see* 18 U.S.C. § 3561(a), § 3559(a), treated probation as a “form of sentence” in its own right, *see* 18 U.S.C. § 3551(b)(1), § 3561(a), § 3562-3564, and directed the Commission to promulgate a guideline for the use of the courts in determining whether to impose a sentence of probation or a term of imprisonment, 28 U.S.C. § 994(a)(1)(A), and to reflect the general inappropriateness of imprisonment for the purpose of rehabilitation, 28 U.S.C. § 994(k). S. Rep. No. 98-225, at 59.

This Court should consider granting a variance in determining Rasmaea’s sentence because her community responsibilities are extraordinary. According to the Supreme Court, the Guideline language does not preclude consideration of “discouraged” factors, but only that they should be considered in exceptional cases. *See Koon v. United States*, 518 U.S. 81, 96 (1996); *see also United States v. Canoy*, 38 F.3d 893, 906 (7<sup>th</sup> Cir. 1994) (“We hold that a district court may depart from an applicable guidelines range once it finds a defendant’s family ties and responsibilities or community ties are so unusual that they may be characterized as extraordinary”).

## II. Rasmaea Odeh’s Personal History and Characteristics and the Circumstances of the Offense Warrant a Non-Incarceration Sentence Under § 3553(a)(1).

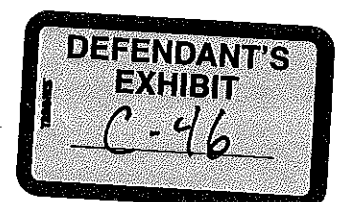
Under Supreme Court law, a defendant’s history and characteristics “is clearly relevant to the selection of an appropriate sentence,” and each sentence must “fit the offender and not merely the crime.” *Pepper v. United States*, 131 S. Ct. 1229, 1240 (2011) (citing § 3553(a)(1)). Our brief summary of Rasmaea’s personal history describes a leader in the international struggle to empower women and to end violence against women. She is widely recognized for her pain and suffering endured in Israeli prisons and her willingness to testify before a United Nations Committee in Geneva as a survivor of sexual torture. Her personal history also tells of a decades of feminist activism on behalf of Arab and Muslim immigrant women living in poverty in Chicago. Rasmaea built the Arab Women’s Committee and its base



of nearly six hundred Arab immigrant women from scratch when she went door to door as a recent immigrant herself and made phone calls to households with Arabic names from the white pages. Her contributions to humanity have been nothing less than outstanding!

**III. A Non-Incarceration Sentence is Sufficient to Protect the Public Under §3553(a)(2)(C) and Provide Just Punishment Under § 3553(a)(2)(A) Because Rasmea Odeh's Personal Characteristics Prove That She is a Low Recidivism Risk.**

Rasmea's personal characteristics—including his age, employment, education and lack of drug use—render him statistically unlikely to reoffend and thus further reduce the need to protect the public. The Seventh Circuit has consistently held that a district court may grant below-Guidelines sentences based on the fact that a defendant's age reduces the possibility that he will commit crimes in the future. See, e.g., *United States v. Carter*, 538 F.3d 784, 792 (7th Cir. 2008); *United States v. Holt*, 486 F.3d 997, 1004 (7th Cir. 2007) (affirming below-Guidelines sentence based entirely on fact that defendant's age made it unlikely he would reoffend). Indeed, as the Seventh Circuit has noted, the Guidelines ranges do not account for age. *United States v. Powell*, 576 F.3d 482, 499 (7th Cir. 2009) (remanding and requiring district court to consider arguments about defendant's advanced age). A sentence of Probation affords adequate deterrence to Ms. Odeh from engaging in any future criminal conduct. Moreover, Ms. Odeh is at a much lower risk of recidivism than the average defendant, as she has many factors recognized by the United State Sentencing Commission to lower the rate of recidivism. See U.S.S.C., "Measuring Recidivism: The Criminal History Computation of the Federal Sentencing Guidelines," at 12 & Ex. 10, available at [http://www.ussc.gov/Research\\_Publications/Recidivism/200405\\_Recidivism\\_Criminal\\_History.pdf](http://www.ussc.gov/Research_Publications/Recidivism/200405_Recidivism_Criminal_History.pdf). She is well educated having earned a law degree. (Recidivism decreases with increasing educational level). Furthermore, because Ms. Odeh is 66 years old, she is at an even lower risk of recidivism, as offenders over age 50 have a recidivism rate of only 9.5 percent. *Id.* at 12 & Ex. 9. Courts in the 7th Circuit have recognized these factors and their corresponding recidivism rates in departing downward from the sentencing guidelines. See *United States v. Urbina*, No. 06-CR-3362009, WL 565485 at \*3 (E.D. Wis. March 5, 2009) (finding defendant did not pose a significant danger or risk of re-offending based in



part on significantly lower recidivism rates for those employed in the year prior to arrest, and for those who are or were married but later divorced).

As a result, Ms. Odeh does not pose a significant threat of re-offending and the Court should enter a variance from the sentencing guidelines, as a sentence of probation will adequately deter her from any future criminal conduct.

IV. Rasmae Odeh's inevitable deportation will more than adequately reflect the seriousness of the offense, it would promote respect for the law, and provide just punishment.

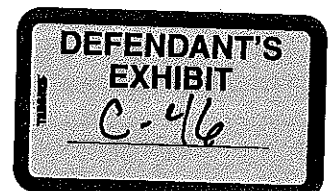
A variance is warranted as the purposes of sentencing have been satisfied prior to Ms. Odeh's sentencing. Again, a sentencing court must always consider the purposes of sentencing when imposing a sentence. In *Redemann*, as the court exercised its departure authority under § 3553(b), it ruled that "If the circumstances of the case reveal that the purposes of sentencing have been fully or partially fulfilled prior to the imposition of sentence, a sentence within the range set forth by the guidelines may be 'greater than necessary' to satisfy those purposes." 295 F. Supp. 2d at 895-96.

Ms. Odeh has suffered enough already. A felony conviction will lead to her deportation from the United States and from two-decades of work and leadership on behalf of Arab and Muslim immigrant women living in poverty in the Chicago Metropolitan Area. She has suffered enough. When the Israeli military arrested her, they also arrested her family members and destroyed her family's home. Her 1969 conviction in Israel was determined by a court system that systematically abuses Palestinians' due process rights. She will suffer from her deportation, and the hundreds of immigrant women that she has helped will suffer.

Respectfully yours,

Standish E. Willis

Attorney At Law





Southside Together Organizing for Power

602 E. 61<sup>st</sup> st - Chicago, IL 60637 - [www.stopchicago.org](http://www.stopchicago.org)

(773) 217-9598 [southsidesstop@gmail.com](mailto:southsidesstop@gmail.com)

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February 7, 2015

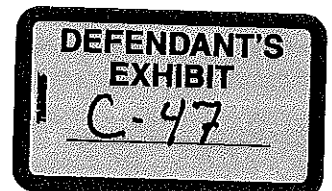
To Whom It May Concern:

I am writing on behalf of Southside Together Organizing for Power (STOP) in support of leniency in the sentencing of Rasmea Odeh. Our organization has had the pleasure of working with Rasmea and the organization that she co-directs, the Arab American Action Network, for many years now. Rasmea is a respected community leader who has selflessly given her time and energy for decades to help ensure the wellbeing of people in her community and other marginalized communities in and around Chicago and beyond. It is hard for us to understand how a woman who is a model for service, for giving, for responsibility, for integrity, for concern for those with the least and consistent and selfless pursuit of the common good could possibly be facing anything other than congratulations and awards for all she has done, much less be facing potential consequences from the justice system.

Looking at the details of Rasmea's case, it is hard to understand the original decision in the first place. She has faced unjust detention and torture, survived tremendous psychological damage, someone despite that found a way to re-establish herself in the United States and build up an organization in Chicago that now has a track record of decades of service. If there is no possibility of overturning the original unjust conviction, the very least this court can do is grant leniency to ensure this upstanding and valued community member be able to continue her essential service work.

Sincerely,

Matt Ginsberg-Jaeckle,  
Co-founder, Southside Together Organizing for Power (STOP)





6930 Carroll Avenue, Suite 419  
Takoma Park, Maryland 20912  
202.529.4225  
www.defendingdissent.org  
info@defendingdissent.org

Founded in 1960 as the National  
Committee to Abolish HUAC

February 6, 2015

Honorable Judge Gershwin Drain,

On behalf of myself and the Board of Directors of the Defending Dissent Foundation, I am writing to request leniency from you in the March 12 sentencing of Rasmae Odeh. DDF is a civil liberties organization founded in 1960 to promote and strengthen civic engagement in the United States.

Sue Udry  
Executive Director

Our request for leniency for Ms. Odeh is based on her role as a contributing and productive member of society, doing work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community. She is a leader and role model, having dedicated 50 years of her life to serving her community wherever she has lived. In Chicago, she built the Arab Women's Committee, which has some 600 members and provides support, empowerment and community to immigrant and refugee women from war-torn countries.

Woody Kaplan  
President

Fadi Saba  
Vice-President

Chip Berlet  
Secretary

Don Goldhamer  
Treasurer

We deeply appreciate your consideration of Ms. Odeh's contribution to her community, and not deprive those who have benefited, and could continue to benefit from her good work.

Timuel Black

Emily Berman

Emily Goodman

Arun Gupta

Connie Hogarth

Hussein Ibish

Victor Navasky

Suraj Sazawal

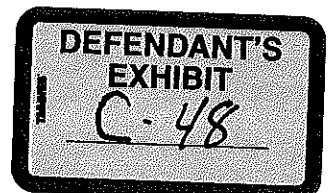
Chris Townsend

Reverend C. T. Vivian

Respectfully yours,

Sue Udry  
Executive Director

*In Memory of  
Frank Wilkinson,  
Director Emeritus &  
Chauncey Alexander,  
President Emeritus  
and all who went before...*



I am Area Vice President of the Minnesota AFL-CIO Retirees Council. I am writing to you to request leniency in the March 12 sentencing of Rasmae Odeh, who I know as a beloved community leader in the Chicago Arab American community. Rasmae is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmae's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

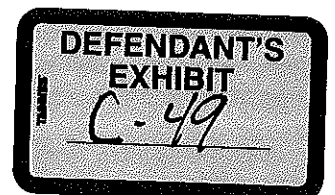
Compassion in her sentencing will serve justice. She is 67 years old and has already endured imprisonment after her sentencing in a cold, damp and uncomfortable cell in virtual isolation. Because she is a survivor of torture, this time may well have triggered her PTSD.

If she loses her appeal she likely faces deportation and the end of a rich, full and useful life she has built in Chicago over the last 20 years. She will be cut off from family, friends and the important work she has been doing. This is a difficult and heartbreaking prospect at any age but especially hard at her age. This should not be compounded by time in jail.

On the other hand, there is a possibility she will win her appeal. Keeping her out of jail will benefit her and her community. It would allow her to continue to be a productive person serving a community who needs and depends on her.

Respectfully yours,

Wayne Wittman, Mn. AFL-CIO Retiree Council Area Vice President





# DRUM

## DESIS RISING UP & MOVING

72-18 Roosevelt Ave, 2<sup>nd</sup> Floor, Jackson Heights, NY 11372  
Tel. (718) 205-3036 | Fax (718) 205-3037 | info@drumnyc.org | www.drumnyc.org

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February 4, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who we know as deeply respected community leader by immigrant communities in Chicago and across the country. As an organization of over 2,500 South Asian immigrants, workers, and youth in NYC, we look to the legacy and impact of Rasmea's work in her communities as the model for emulation in our own work.

We have had the privilege of working with Rasmea directly, as well as with the people who have been touched by her work, and without a doubt, a consistent theme in all encounters has been Rasmea's desire to help others and to work for justice for all communities. Rasmea's spirit and work is contagious. Every minute of Rasmea's separation from her communities is a loss to countless families, community institutions, and the city of Chicago as a whole.

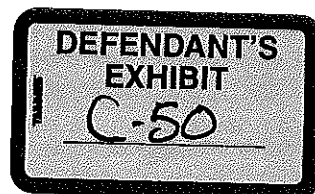
For Rasmea herself, as a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD). With firm expectation of her conviction being overturned on appeal, we believe that keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim communities. We are asking for leniency in her case so that Rasmea does not have to spend another day in prison.

We sincerely hope that you will consider our request for leniency in Rasmea's case.

Respectfully,

Fahd Ahmed  
Acting Director

DRUM - Desis Rising Up & Moving



Daniel L. Meyers  
Attorney-at-Law  
P.O. Box 909  
New York, New York 10009  
212-226-4106

January 30, 2015

Hon. Gershwin A. Drain  
U.S. District Judge  
Eastern District of Michigan  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd.  
Detroit, MI 48226

Re: U.S. v. Rasmea Odeh  
13 cr. 20772

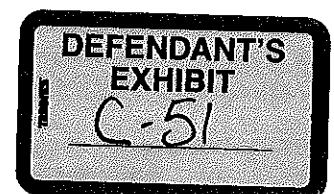
Dear Judge Drain:

Previously, I wrote this Court, along with many others, requesting reasonable bail for Ms. Odeh which was granted. I write now in support of a reasonable sentence, a sentence of leniency, a sentence of time-served for Ms. Odeh.

My familiarity with this matter has been gained by following the case with interest as reported in the media, having conversations with defense counsel whom I've known for decades; having met and conversed with Ms. Odeh in the fall of 2014; and having perused some of the litigants' papers and the decisions and orders of this Court.

I am of the opinion that a sentence of time served is reasonable and supported by the controlling sentencing laws found in 18 U.S.C. 3553(a) and 18 U.S.C. 3582. 3553(a) directs a sentencing court to "impose a sentence sufficient but not greater than necessary." Under 3582, in determining whether and to what extent imprisonment is appropriate based on the 3553(a) factors, a sentencing court is to "recognize[e] that imprisonment is not an appropriate means for promoting correction and rehabilitation."

Obviously counsel for Ms. Odeh will set forth all relevant factors under 3553(a) for a non-custodial sentence. I do know that the offense of conviction is non-violent, without harm to another person. Years ago Ms. Odeh, now 67, emigrated to the United States, her only home. She has lived openly and positively in the U.S. She is employed and works with people who need her guidance. She works selflessly for causes that she holds dearly, mostly in Chicago where she is well known and admired.





Allowing Ms. Odeh to be free under supervision in Chicago where she will continue to make a positive contribution to a community that needs her mature perspective, is a sentence properly exercised in accordance with U.S. sentencing laws.

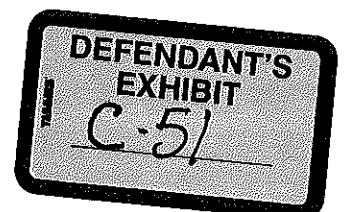
I am licensed to practice law in the state of New York (admitted in 1967). I am admitted to practice in multiple U.S. District Courts and Courts of Appeals.

Thank you for your kind attention to this matter.

Respectfully yours,

A handwritten signature in cursive script that reads "Daniel L. Meyers". The signature is written in black ink and is positioned above the typed name.

Daniel L. Meyers



KALMAN D. RESNICK  
Tel: 312-604-2608  
Fax: 312-604-2609  
kresnick@hsplegal.com

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February 4, 2015

Hon. Judge Gershwin Drain  
U.S. District Court  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd.  
Detroit, MI 48226

**Re: Request for Leniency for Rasmea Odeh**

Dear Hon. Judge Drain,

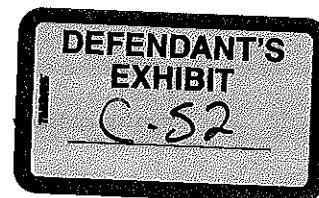
**Introduction**

I am writing this letter to request leniency in your sentencing of Rasmea Odeh. This letter will explain my professional and religious background, how I came to know Rasmea, and why I believe that Rasmea deserves leniency.

**My Background**

I am a 1973 graduate of the University of Michigan Law School. Following graduation, I received a Reginald Heber Smith Fellowship to work at the Legal Assistance Foundation of Chicago. While employed at the Legal Assistance Foundation of Chicago, I founded the Legal Services Center for Immigrants and served as its first director. The Center, which continues to operate as part of the Legal Assistance Foundation of Chicago today, is dedicated to defending the legal rights of low income immigrants in the Chicago metropolitan area. Since 1980, I have been engaged in the private practice of law, concentrating in the areas of immigration, labor, employment, and civil rights law. I am a shareholder with the law firm of Hughes Socol Piers Resnick & Dym, Ltd., where I have directed the Firm's immigration and nationality practice since 1990.

Since 1956, I have been a member of Beth Emet Synagogue in Evanston, Illinois. I have served on the Beth Emet Board of Trustees. I have also been a member of the Board of Directors and Vice President of the Jewish Council on Urban Affairs, a Chicago-based non-profit dedicated to the involvement of Chicago's Jewish community in social justice advocacy. In addition, I have served as a member of the Board of Directors of the Illinois Coalition for Immigrant and Refugee Rights and the Spanish Coalition for Jobs (since renamed the National Latino Education Institute). In 2012, the Jewish Council on Urban Affairs awarded me the Rabbi Robert J. Marx Social Justice Award for my advocacy of justice for immigrants. I am also a member of the Arab Jewish Partnership for Peace and Justice in the Middle East, a non-profit organization dedicated to bringing



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together Jewish and Arab Americans seeking a peaceful and just solution to the conflict between Israel and Palestine through education and advocacy.

#### How I Met Rasmea

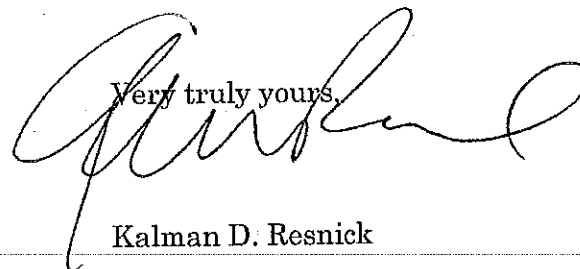
I first met Rasmea through my advocacy of immigrant rights and my involvement with Arab Jewish Partnership for Peace and Justice in the Middle East. In her positions as Associate Director of Arab American Action Network and as founder of Arab Women's Committee, Rasmea has advocated for immigrant and refugee rights and the rights of Arab American women. I have also appeared with Rasmea at a number of meetings between Jewish and Palestinian Americans advocating for a non-violent and just resolution of the Israeli Palestinian conflict.

#### Why Rasmea Merits Leniency

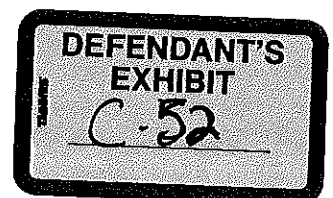
I strongly urge you not to sentence Rasmea to prison. First, Rasmea's imprisonment will prevent her from continuing her advocacy for the rights of immigrants, refugees, and women and will harm the communities served by the Arab American Action Network and the Arab Women's Committee, organizations on whose leadership team she serves. Second, Rasmea's imprisonment will prevent her from continuing her work with Arab and Jewish Americans seeking to achieve through nonviolence a peaceful and just solution to the Israeli Palestinian conflict. Third, Rasmea's imprisonment will adversely impact her emotional and physical health. Rasmea, who is 67 years old, is just a year older than me. As a 66 year old, I am in a particularly good position to understand how harmful imprisonment would be for Rasmea's emotional and physical well-being. I am particularly concerned over the impact of imprisonment on Rasmea's health because she was a victim of torture while imprisoned in Israel and as a result, suffers from Post-Traumatic Stress Disorder. As a lawyer who frequently represents victims of torture seeking asylum in the United States, I am well aware of the impact on victims of torture of incarceration and other hardships.

For all the reasons set forth above, I strongly urge you to show leniency to Rasmea in your sentencing of her and to avoid any sentence which would require her to be incarcerated.

Very truly yours,



Kalman D. Resnick



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Department of Sociology  
COLLEGE OF LETTERS and SCIENCE

SANTA BARBARA, CALIFORNIA 93106-4015  
(805) 893-2318 FAX (805) 893-5532

January 16, 2015

Honorable Judge Gershwin Drain,

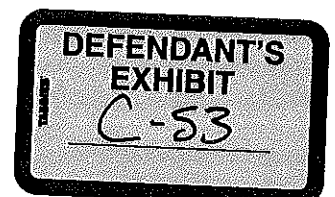
I write to urge you to be lenient when you sentence Rasmae Odeh on March 12. My interest in this case is not that of a passive observer or close acquaintance of Ms. Odeh. Rather, I was contacted by her attorney after charges were brought to provide an affidavit relating to her torture by Israeli security forces and subsequent conviction in an Israeli military court (these issues fall within my areas of academic expertise) and, possibly, to testify as an expert witness at her trial. You declined both of these offerings.

Although you decided to exclude testimony and evidence about Ms. Odeh's experience of torture at trial, at the sentencing phase I urge you to regard this as a mitigating factor. In a context where torture was prevalent and systemic (i.e., the Israeli-occupied West Bank and the military court system used to prosecute and convict Palestinians), Ms. Odeh's experience was among the very worst on record. The effects of this experience have colored her entire life, and affected her mental health. The experience itself and the resultant effects are legitimate grounds for mitigation. I urge you to take this into consideration on March 12.

Sincerely,  
Lisa Hajjar

**Lisa  
Hajjar**

Digitally signed by Lisa Hajjar  
DN: cn=Lisa Hajjar, o=UCSB,  
ou=Sociology Department,  
email=lhajjar@soc.ucsb.edu,  
c=US  
Date: 2015.01.16 13:18:59  
+02'00'





# NATIONAL COALITION TO PROTECT CIVIL FREEDOMS

*Established October 2010*

National Coalition to Protect Civil Freedoms  
P.O. Box 66301  
Washington, DC 20035

February 4, 2015

Re: Rasmea Odeh

Dear Honorable Judge Gershwin Drain,

As an organization that protects and promotes the civil liberties on which our country was built, the National Coalition to Protect Civil Freedoms is writing to request leniency from you in the March 12 sentencing of Rasmea Odeh. Our coalition is composed of 18 organizations with a wide variety of members including those who have known and worked with Rasmea and who support her and her work as a pillar of the community.

Those who had the privilege of working with Rasmea, were touched by her commitment to improving lives for immigrants and refugees and helping them adjust to life in the United States. Rasmea was a foundational member in her community and built bridges between various groups and populations in Chicago. Rasmea's desire to help others and to work for justice for all members of her community has inspired members of our coalition to improve our work, and dedication. Rasmea's positive spirit is contagious. She approaches life with passion and zeal to lift up the community in which she works. .

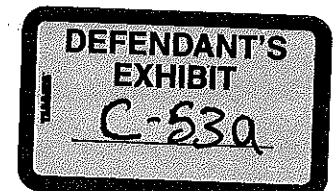
We are aware that if Rasmea's conviction is not reversed on appeal, she faces possible deportation that would sever the strong ties that she has built with individuals and communities during her time in the United States. However, we hope that Rasmea will be able to continue pursuing her award winning work in support of the Chicago communities Arab and Muslim community. We are asking for leniency in her case so that Rasmea does not have to spend another day in prison.

Thank you for considering our request for leniency in Rasmea's case.

Respectfully,

A handwritten signature in cursive script that reads "Stephen F. Downs".

Stephen F. Downs  
Executive Director of The National Coalition to Protect Civil Freedoms, and Former  
Chief Counsel to the New York State Commission on Judicial Conduct



Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh. I do not know Ms. Odeh personally but ask for leniency for her both from my perspective as a Chicagoan deeply connected to community movements in the city and as a Jewish woman who, concerned with Israel, Palestine, the Middle East and the impact of the conflict on the United States.

From friends in the Palestinian community in Chicago I know of Ms. Odeh's consistent and thoughtful leadership in the community – her dedication to bettering lives and of the leadership that has earned her great respect. From my numerous visits to and investigations in Israel and the West Bank I am only too fully aware of a court system that in the most Kafkaesque ways turns innocent people into criminals through the use of intimidation and torture.

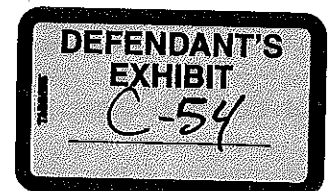
Ms. Odeh has suffered greatly from her ordeals in Israel and in the U.S.. No good purpose would be served ; rather greater harm would be done should she be confined to prison while the determination of her appeal is pending. Knowing that she is an asset, not a danger, to the community, I respectfully request that she be allowed to resume her life with the family and friends she needs to support her.

Thank you for your consideration

Marilyn Katz

Chicago

Marilyn Katz  
President  
MK Communications  
350 West Hubbard Street  
Chicago, Il. 60654  
312-822-0505 (o)  
312-953-1225 (c)



Joining Hands for Justice  
in Israel and Palestine



596 Kenilworth Circle  
Stone Mountain, GA 30083

February 2, 2015

Honorable Judge Gershwin Drain

Dear Judge Drain:

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a community leader in the Chicago Palestinian-American Community.

I am Chair of Joining Hands for Justice in Israel & Palestine (JHJIP), a Partnership of the Greater Atlanta Presbytery. JHJIP is comprised of member Presbyterian congregations of the Greater Atlanta Presbytery. We have been involved in speaking out to support a just decision in Rasmea Odeh's case since October 2014, when we learned that she would have a hearing on immigration fraud, and the circumstances which led to her initial arrest.

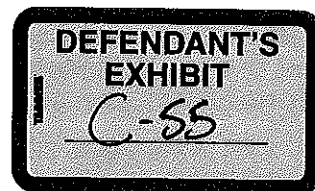
Rasmea Odeh was convicted in a federal court in November on one count of immigration fraud based on her failure to indicate on her naturalization application that she had been arrested, charged and convicted by an Israeli military court of a crime she maintains she didn't commit. She was severely tortured into signing a confession, and spent 10 years in an Israeli prison. She nor her attorney were allowed to share details of this conviction experience during her trial.

Rasmea came to the U. S. in 1995, and has worked for social and economic justice for those in her community, serving as Associate Director of the Arab American Action Network. She received the Mosaid Award for outstanding community service from the Chicago Cultural alliance, which speaks further to her great work in the community.

This forty year old incident has greatly affected her life, but should not control what happens to her going forward. I ask that you consider the person she is today.

Sincerely,

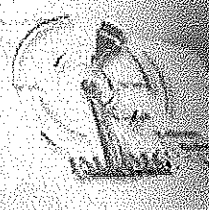
Mary H Smarr, Chair





**International Middle East  
Media Center**

**مركز الشرق الأوسط الدولي للإعلام**



Tuesday, January 20, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a respected organizer for Palestinian human rights.. In my capacity as North American Spokesperson and Media Liaison for the International Middle East Media Center, I understand deeply the cruelty which Mrs. Odeh has tirelessly addressed through her activism.

I greatly respect Mrs. Rasmea Odeh for her commitment to championing for Palestinians who have lived under a brutal occupation for over fifty years. Mrs. Odeh has been a voice for the voiceless and her courage inspires me. Aside from her community organization, Mrs. Odeh is an icon for Arab American communities in the United States at a time when many feel marginalized and discriminated against.

By further punishing Mrs. Odeh you will be sending a loud and clear message to the Arab American community that the United States is not their home.

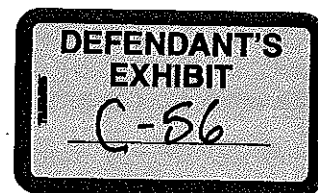
Mrs. Odeh is a survivor of torture endured during her administrative detention in Israeli prisons. Much of her time in the Israeli prison system was spent in solitary confinement. Now, at the age of 67, Radmea Odeh once again faces prison in the country she immigrated to for asylum.

I appeal to you on behalf of Rasmea Odeh, and my employer, the International Middle East Media Center, to show mercy and leniency to this cherished member of our community.

Respectfully yours,

Alexandra Halaby

North American Spokesperson & Media Liaison | International Middle East Media  
Center | [alexandra@imemc.org](mailto:alexandra@imemc.org) | Tel: 847-497-8478 | Mobile: 618-559-3477





Monday, February 2, 2015

Stan West  
P.O. Box 1294  
Oak Park, IL 60304

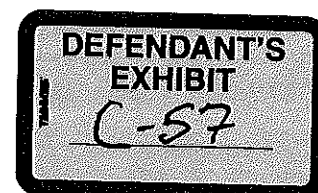
Honorable Judge Gershwin Drain,

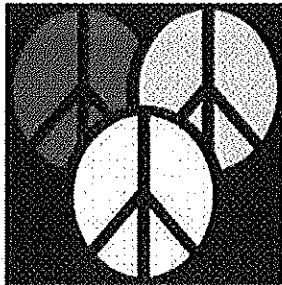
The first thing they teach us as journalists is to seek the truth. We're also taught to seek balance, proportion, accuracy and use as many reliable, credible sources as possible. I'm writing to request leniency from you in the March 12 sentencing of Rasmae Odeh, an award-winning community leader. While I don't actually know her, I do know her Palestinian-American family – the Odehs, and have know them for a couple decades since I was the morning talk show host on WVON-AM Radio, Presently, I'm a columnist with the Wednesday Journal in Oak Park where the president(Mayor) here is also a law-abiding Palestinian-American, Anan Abu-Taleb. Here's a link to a story about him.

[http://www.oakpark.com/News/Articles/12-30-2013/Oak-Park-Villager-of-the-Year:-Village-President-Anan-Abu\\_Taleb/](http://www.oakpark.com/News/Articles/12-30-2013/Oak-Park-Villager-of-the-Year:-Village-President-Anan-Abu_Taleb/)

Here's what I know. Rasmae Odeh's case is supported by an Oak Park-based group of Jewish, Christian, Muslim and Buddhist citizens called The Committee for a Just Peace in Israel and Palestine. I know the Odeh family to be intelligent, law-abiding, compassionate people. I've learned through them and others that, Rasmae, whom I've seen in a documentary about Palestinian-American women, was indicted in October, 2013 for allegedly falsifying information on her immigration papers. This November, she received a guilty verdict after a trial, in which the core of her defense was not allowed to be presented in court. That included evidence of torture and rape in the Israeli military prison system and subsequent post traumatic stress disorder. In light of this new information that you should include in your sentencing March 12. Reasonably people suggest you be lenient, Honorable Judge Gershwin Drain.  
Thanks in advance for your consideration.

Very truly yours,  
Stan West





Unity

# United National Antiwar Coalition

UNACpeace@gmail.com or UNAC at P.O. Box 123, Delmar, NY

518-227-6947 www.UNACpeace.org

1/29/2015

Honorable Judge Gershwin Drain,

Rasmea Odeh has been an inspiration to our coalition and to so many others. We therefore request leniency at her March 12 sentencing.

UNAC is the largest anti-war coalition in the United States representing groups in cities all across the country. We are very disturbed that Rasmea, at this time in her life, faces the possibility of jail and deportation. In no way can she be considered a threat to the United States and in so many ways she represent the kind of person we all should be. She is one who puts her needs second to the needs of those who are oppressed and are suffering.

Please be lenient during your senteneing of her.

Sincerely,

Joe Lombardo and Marilyn Levin

Co-coordinators

United National Antiwar Coalition (UNAC)

DEFENDANT'S  
EXHIBIT

C-58

Dear Honorable Judge Drain,

We write to you on behalf of Ms. Rasmae Odeh, who was recently convicted in your court of unlawfully procuring naturalization. We understand that Ms. Odeh faces deportation and up to ten years in prison. Your Honor, we implore you to show Ms. Odeh, a 67-year-old woman who has been a grandmother to many of us, mercy in determining her sentence. We believe such mercy is deserved by Ms. Odeh's age, spotless record during her time in the United States, and her selfless devotion to the Chicago community, making one of America's greatest cities a better place to live, particularly for Arab Americans and recent Arab immigrants.

Ms. Odeh grew up in Palestine, where she and her family endured tremendous trauma; it is no secret that she suffered weeks of sexual assault and torture in 1968 at the hands of the Israeli military. As you recognized in one of your pre-trial orders, Ms. Odeh's claims of sexual assault and torture in Israeli custody are "credible." Indeed, we know these claims to be more than credible: they actually bear testament to Ms. Odeh's strength, courage, and steadfastness.

While we understand that Ms. Odeh was found to have violated US law by a jury of her peers, we know that Ms. Odeh is much more than this conviction alone. And it is our hope that you see Ms. Odeh not as a convicted felon, too but as a proud woman who has served as an inspiration to hundreds of similarly situated women, some of whom are also survivors of sexual assault and torture. She is our matriarch and we adore her.

We are reaching out to you because we are confident that you will see Ms. Odeh as a person, one who made a mistake, but who is not a hardened criminal deserving of harsh punishment and lengthy incarceration. Ms. Odeh is not only a beloved member of the Chicago and US Palestinian community, she is also a productive US citizen and a critical member of the broader Chicago progressive community. Despite the hardship she has faced throughout her life, Ms. Odeh is a force for social change, peace, and love toward everything and everyone around her. Ms. Odeh has positively influenced us as students, having proved that it is possible to rise above the ashes and achieve.

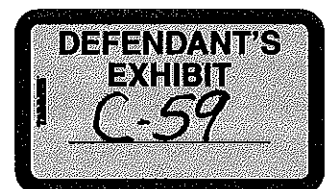
Ms. Odeh is also sixty-seven years old and on medication. We believe she is in no physical condition to endure a prison sentence.

We are asking you to consider all of the above when determining Rasmae Odeh's sentence. We plead for as much leniency as possible.

We thank you for your time and consideration.

Respectfully,

National Students for Justice in Palestine Steering Committee



February 4, 2015

4032 12th Ave. S.  
Minneapolis, MN

Honorable Judge Gershwin Drain:

We are writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, a strong community leader who has dedicated her life to the empowerment of the Palestinian people and to women in particular. As trade unionists, we understand the history of political repression against those who organize for economic and social justice, and because of that, we have long been on the frontlines of defending freedom of speech and freedom of association. We believe that Rasmea Odeh is the subject of political persecution for the work that she has done in organizing on behalf of Palestinian people, and in particular for Palestinian and other Arab immigrant women. Justice will not be served by a harsh sentence of Ms. Odeh.

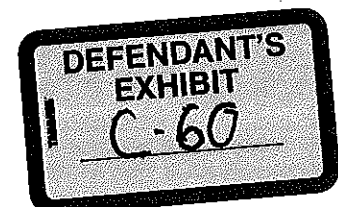
Rasmea Odeh is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and community, and call their home.

Ms. Odeh has already suffered from extreme torture at the hands of the Israeli government, including being forced into a confession while being subjected to physical and sexual torture perpetrated in front of her now deceased father. As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while recently incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD).

It is very clear that Ms. Odeh is a deeply loved and valued member of her community, for whom she has worked tirelessly. A harsh sentence for Ms. Odeh will not only punish her, but will also punish the 600 women who rely on her for leadership and inspiration. It will also have a chilling effect on all who organize for social and economic justice.

Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Respectfully yours,  
Cherrene Horazuk, President, AFSCME 3800  
Patrick Kearns, RN, President, AFGE 2547  
Mark Froemke, President, West Area Labor Council, MN AFL-CIO  
Joe Burns, Labor Negotiator and Author  
David Riehle, Local Chairman, United Transportation Union 650 (retired)  
Gladys McKenzie, AFSCME Council 5 Field Representative (retired)



February 9, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as valued community leader in Chicago. For the past eight years, I have lived and worked in Chicago while completing a PhD at the University of Chicago. During this time, I have worked as a community organizer and adult education instructor, first with Southside Together Organizing for Power and, more recently, with the Chicago Anti-Eviction Campaign.

While working with these organizations, I've gotten to meet the Odeh family and have developed a deep appreciation and respect for their humility, generosity, and commitment to addressing the needs of those marginalized, particularly refugee immigrant women, within our society. In a city as racially segregated as Chicago, these values are in short supply and Rasmea's ability to live these values and instill them in others continues to be vitally important.

With Ramsea currently faces sentencing for a conviction of Unlawful Procurement of Naturalization, I ask that you consider leniency in determining a final sentence. The loss of citizenship and a subsequent deportation would cut all her ties with family and community in Chicago. As a person of Palestinian origin, she would be unable to return to her homeland, but would instead have to restart her life in a new country at 67-years old.

Furthermore, as an elderly woman, she would face particular hardship if sentenced to a long prison term. During the time period following the guilty verdict, her health suffered under the cold, damp, and uncomfortable conditions in the St. Clair County Jail, as they surely would in any facility lacking medical services and accommodations to provide for senior citizens.

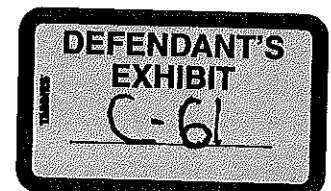
As there is a strong possibility of her conviction being taken up on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrants, particularly refugee women, here in Chicago.

While you have a number of factors and competing interests to weigh in the course of sentencing proceedings, I hope you consider the profound impact she has had on some of Chicago's most vulnerable citizens in choosing leniency in your final decision.

Respectfully yours,

Toussaint Losier, PhD

Toussaint Losier  
4940 S. East End Ave #6F  
Chicago, IL 60615





The Palestinian Youth Movement  
52 North Broadway, White Plains, NY 10603  
Pym.usa.gc@gmail.com

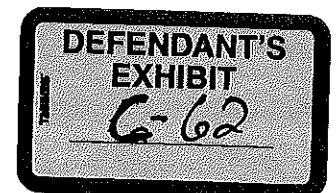
February 4, 2015

Honorable Judge Gershwin Drain,

We are a grassroots collective of Palestinian youth in the United States committed to justice, human rights and freedom for our people and homeland as well as for all people in struggle in our local communities and across the world. We are writing to request leniency from you in the March 12, 2015 sentencing of Rasmae Odeh who is a beacon of hope, strength, dedication, resilience and honesty for our community.

We have come to know Rasmae through her many years of community service both locally in Chicago and nationally. Her role as a social justice and anti-war activist, a violence prevention and intervention case manager, and a women and youth leadership mentor, has positioned her among the most respected, loved and cared for people in the Arab and Muslim community nationally. She is not just a community member. For many of us youth, Rasmae is family. We think of her in the same way we think of our mothers and grandmothers. She is someone to talk to when we are feeling alone, someone we can always depend on to defend us or even broker sensitive conversations in our very own families, and someone who always encourages us to explore our creativity and the opportunities afforded to us as a new generation.

As a new generation of Palestinians, we continue to witness the rapidly deteriorating conditions in our homeland, constant death, and the ongoing criminalization, censorship and alienation of our communities here in the US. We are a stateless people and even in our refuge here in the US, we are constantly reminded we do not belong. With these conditions, it is difficult to encourage our youth that they mean something and that if they work hard they have the power and opportunities to make change. Many elders in our community find it difficult to understand our struggles as second-generation youth in a post-9-11 US social and political climate. However Rasmae is unlike many others. She listens and understands our struggles. She goes out of her way to support and encourage us even if our cultural, spiritual and political practices stray from the traditions of our elders. Her experience as a woman, stateless person, survivor of gendered and sexual violence, and community service leader have all contributed to the unique



composition of her character. Her character is self-less, honest, giving, kind, principled and resilient.

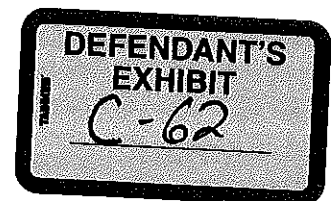
She has dedicated her whole life and heart to standing on the side of justice when others too often fear to speak truth to power. There is no one with more of a moral compass than Rasmea Odeh and the care that she demonstrates for her community and for the world should be celebrated and honored, not criminalized.

In November 2014, Rasmea was convicted of Unlawful Procurement of Naturalization. Compassion in her sentencing will serve justice in this case. She was detained for a month immediately following the verdict, including almost 3 weeks in solitary confinement, which was extremely difficult for her.

As a survivor of torture, engagement for the betterment of her community in Chicago is critical to her emotional health; the isolation she endured while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder (PTSD). Without being lenient on her sentence, the US court system will demonstrate yet again a complete disregard for and failure in supporting women who are survivors of violence. A prison term sentence rather would demonstrate that US law and the judicial system at large willingly participates in the cycles of violence that have stolen the lives of so many women through history and today and in particular, women of color. Additionally, the poor treatment Rasmea received in the St. Clair County Jail highlights the complete disregard for accommodations made for survivors of violence and for senior citizens. Such state repression should be not tolerated and utterly unacceptable by a judicial system that claims itself to be fair and balanced.

Judge Drain, on your appointment to the United States District Court, President Obama made the following statement, "Judge Gershwin A. Drain will bring an unwavering commitment to fairness and judicial integrity to the federal bench. His impressive legal career is a testament to the kind of thoughtful and diligent judge he will be on the U.S. District Court." We are asking that you stand on the side of justice by offering your upmost respect and compassion for Rasmea Odeh. We are calling on you to support her conviction being overturned by an appeal. Keeping her engaged in her community would benefit all people in society and in particular the many immigrant and refugee families Rasmea serves daily. If her appeal were to be denied, Rasmea would lose her citizenship and thus face deportation. This would not only be devastating for her, but for all members of our community. It would be a stain on the legacy of our criminal justice system and an example of the structural injustice laced through our federal and immigration courts and policies. The community finds that these charges in and of themselves are completely unfounded, unfair and motivated by political bias and a racial social current that continues to demonize Palestinians, Arabs and Muslims in the US. The charges have already devastated Rasmea and our community and should absolutely not be compounded by adding a prison term.

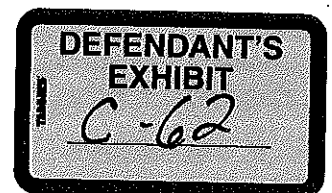
Rasmea is an award-winning leader of Chicago's immigrant community who has dedicated 50 years of her life to serving refugees wherever she has lived. In Chicago, she built the Arab Women's Committee, with some 600 members. Because of Rasmea's work, immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – now have a place to seek support, gain empowerment and



community, and call their home. By stripping Rasmea from our community, the US court system would be enacting a level of state racial violence and repression against a survivor of torture who despite all odds, remains the strong pillar that our community so desperately relies on in these trying times. A harsh decision in her case would not only be an unfair persecution of one individual, but also to the millions of people across this country from all backgrounds who see themselves and experiences in Rasmea's life and values.

Respectfully yours,

The Palestinian Youth Movement (PYM)





Jigna Desai  
3229 Colfax Ave. S.  
Minneapolis, MN 55408

31 January 2015

Dear Honorable Judge Gershwin Drain:

I am writing with great urgency to urge you to apply compassion in the March 12 sentencing of Rasmea Odeh.

Ms. Odeh is a highly respected leader in the international struggle to empower women and end violence against women. She has been active nationally (strengthening vibrant communities through her work developing women's leadership in Chicago) and internationally (importantly providing testimony to the United Nations about the sexual torture she experienced and survived). Additionally, she has built the Arab Women's Committee, an organization that empowers women through creating safe culturally sensitive spaces from violence within refugee and immigrant communities where isolation can otherwise have a devastating impact on women and their families. These organizations have a tremendous impact on immigrant and refugee women's lives by providing them the opportunity to be safe and build successful and independent lives in the United States. As Chair and Professor of the Department of Gender, Women, and Sexuality Studies at the University of Minnesota, I greatly respect Ms. Odeh's contributions to American society. I know that many of my students aspire to do just what she is doing in transforming the lives of vulnerable immigrant and refugee women.

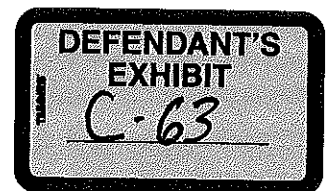
Ms. Odeh and her legal team have said they plan to appeal her conviction for Unlawful Procurement of Naturalization. So long as there is a possibility of her conviction being overturned on appeal, keeping Ms. Odeh out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago.

If Ms. Odeh is not successful in an appeal, I understand that she will likely lose her citizenship and face deportation. To be uprooted from her home and community in Chicago will be devastating. I urge you not to compound the punishment of this traumatized 67-year old woman, a survivor of sexual and physical torture, by sentencing her to prison. The risk to Ms. Odeh's physical and emotional health would not serve the cause of justice.

In hopes that Ms. Odeh does not spend one more day in prison, I ask you for leniency in her sentencing. Thank you for your time.

Respectfully yours,

  
Jigna Desai, PhD



January 31, 2015

Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, a dedicated community leader. As the retired, longtime Executive Director of the Jewish Council on Urban Affairs in Chicago, and now as President of Just Ventures, LLC, and lecturer and field work coordinator at the University of Chicago's School of Social Service Administration, I greatly appreciate and value the work Ms. Odeh has done and led on behalf of many Chicago area families and communities.

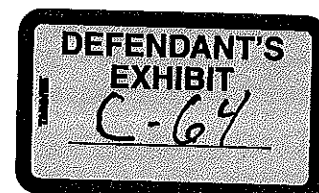
Ms. Odeh's work through AAAN, promoting multi-cultural and multi-ethnic alliances, is critical to solving Chicago's intransigent social and economic challenges. The afterschool and leadership programs she fostered enable youth to have positive channels through which to learn and develop. Initiatives such as the Domestic Violence Program help to reduce the problem of violence and provide avenues to direct services to survivors of domestic violence. Her work with the Arab Women's Committee was vital for hundreds of immigrant and refugee women who came to the US from countries facing war and political crises – like Iraq, Palestine, Yemen, Syria, and beyond – who now have a place to seek support, gain empowerment and community, and call their home. In fact, for her "Outstanding Community Leadership", Ms. Odeh received the Chicago Cultural Alliance's Mosaic Award. Indeed, it is with great appreciation that I join in celebrating her achievements, dedication and commitment in particular to our youth, women, and communities.

I am cognizant, too, about the conditions Ms. Odeh endured following her conviction in November. Being in solitary confinement for three weeks was a crushing blow and may have re-triggered her PTSD as a survivor of torture. If she loses her appeal, she will likely lose her citizenship and face deportation which will not only be a great loss and hardship for her but for all of us as well who benefit from her work. If this occurs, her ties to her family and community in Chicago will be severed, a punishment devastating enough without a prison term as well. Since there is a possibility of her conviction being overturned on appeal, keeping her out of prison would allow her to continue as a contributing and productive person, doing the work that is so critical to hundreds of immigrant and refugee women in Chicago's Arab and Muslim community.

Along with so many others from diverse communities who have been so positively impacted by Ms. Odeh, I wish, again, to thank you for your thoughtful consideration and urge leniency in her sentencing.

Sincerely,

Jane Ramsey  
President  
Just Ventures LLC  
1136 W. Morse Avenue  
Chicago, IL 60626



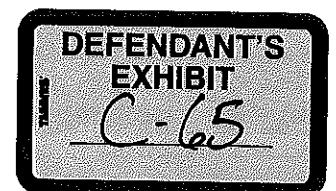
To the Honorable Judge Gershwin Drain,

As a Holocaust survivor living in St. Louis, I am writing to ask you to grant leniency in the March 12, 2015 sentencing of Rasma Odeh. Rasma Odeh is a dedicated, committed community leader, much loved and needed by the community she has been serving, and wishes to continue to serve.

In anticipation, I thank you for your thoughtful and compassionate consideration.

Sincerely,

Hedy Epstein  
5547 Waterman Blvd.  
St. Louis, MO 63112



## West Town Law Office

2502 West Division Street • Chicago, Illinois 60622  
(773) 278-6706 • Fax (773) 278-0635

Melinda Power  
Attorney at Law

Sandeep Basran  
Attorney at Law

February 23, 2015

The Honorable Gershwin A. Drain  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd, Room 123  
Detroit, Michigan 48226

RE: Rasmae Odeh

Dear Judge Drain:

I have been quite attentive to the case of Ms. Odeh. I have had the pleasure of knowing her for several years. Every time I see her, I am so impressed by what a warm, loving and kind person she is.

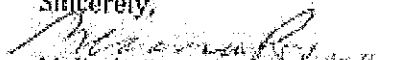
I know that she has worked very hard here in Chicago to improve the lives and conditions of Palestinian women. Her work has made a difference in the lives of Palestinian women in Chicago.

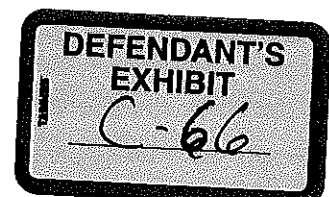
I think it's very significant that Israel, knowing the facts of her case, released her. It's significant because that was recognition that she posed no threat to the state of Israel and an acknowledgment that she had served her time. It is punitive and mean-spirited for the U.S. Attorney to now try to incarcerate her again. She has suffered enough.

Based on the above, I request that you grant her probation and not force her to spend more time in jail.

Thank you for your attention.

Sincerely,

  
Melinda Power



February 17, 2015

Dear Honorable Judge Gershwin Drain,

We are writing to request leniency from you in the March 12, 2015, sentencing of our aunt Rasmae Odeh. Our names are Khalid Mashal, Osama Mashal, and Mohammad Mashal. We are writing on behalf of our entire family.

Rasmae is more than just our beloved aunt; we feel as if she is our mother. She has always stood beside us, especially during difficult times in Jordan, Palestine, and the U.S., when our mother, her sister, was diagnosed with breast cancer, blood clots, diabetes, high blood pressure, and much more. At the same time, our father passed away suddenly after the doctors discovered that he had advanced stage leukemia. Since then, Aunt Rasmae has played the role of mother and father in our lives. She is our main supporter, the person who protects us from negative influences, and the one who takes care of all our needs. She has always done everything in her power to help us become successful young adults.

Aunt Rasmae has suffered enough. We are concerned about her health. She was tortured and raped in prison years ago, as you know, when you acknowledged that her claims of torture were "credible." Despite all the pain that she has suffered, she transformed her experiences into a life of meaning, love, and support to her family, her community, and everyone who needs help.

Aunt Rasmae suffers from Post-Traumatic Stress Disorder, and if she gets locked up in a jail cell, it will only aggravate the physical and psychological symptoms of her condition. In fact, her jail stay after the conviction was another difficult and traumatic experience, from which she is still struggling. She does not deserve this pain. She is almost 68 years old, and her health matters to us greatly.

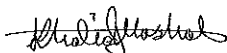
Aunt Rasmae might face deportation, which would mean the end of her ties and relationships to her family, friends, and community. This punishment alone would bring her a significant amount of suffering. Jail time would add unnecessary pain that could be spared with a merciful judgment from Your Honor.

We know that Aunt Rasmae and her legal counsel plan to appeal her conviction. Keeping her out of jail would allow her to be with us, her family, as she continues the valuable work she does for her community, which makes a positive impact on her adopted country that she loves so much.

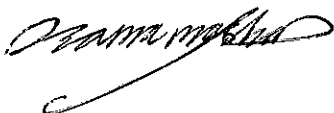
Lastly, although our aunt was found guilty by the jury last year, she is no threat to society. She is a great person who loves this country and her community. She has empowered all of us, as immigrants who came from the Middle East, to call the U.S. home.

Respectfully yours,

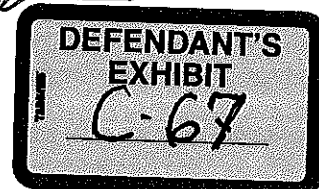
Khalid Mashal



Osama Mashal



Mohammad Mashal



Dear Honorable Judge Gershwin Drain,

My name is Mariam Obaid, and I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh. I know her very well because I am a new immigrant to this country, a member of the Arab Women's Committee that Rasmea established. I would like to say that I am very proud to know Rasmea and to have someone like her in my community.

I never went to school in my life. I don't know how to read or write, even in my native language of Arabic. I used my fingerprint as a signature for years. I never left my house alone. I was dependent first on my father, and then after marriage, my husband. They both always spoke on my behalf. I arrived here with my husband over 25 years ago, spending the first 20 years in California, where all I did was cook and clean, rarely leaving the house. I lived in panic and fear all the time. I never even opened the door when the bell rang.

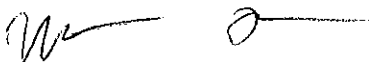
Five years ago, we moved to Illinois, and I met Rasmea three years ago. She encouraged me to participate in the Arab American Action Network (AAAN) English as a Second Language classes and the other activities of the AWC. Rasmea provides us a safe space where we can discuss the difficulties, contradictions, and challenges we face in this country. I learned to read and write in English. I was encouraged to express my feelings and thoughts, and to learn how to reduce the cultural gap between mothers and their American-born children. In addition, we had political discussions that focused on issues like immigrant rights and civil liberties. The program builds active and effective leaders, and I now feel that I am one of them.

Rasmea changed my life and the lives of hundreds of other women in the committee. She pulled me from the darkness to the light, bringing meaning to my life. She has a great sincerity and loyalty to her community and beyond. She is always prepared to help anyone who needs it.

Rasmea is a beloved and respected leader in our community. Her advocacy for us is an example of the work she does for all communities. That is why she is so popular, and why her work in Chicago is considered a model for women's work in the Arab community across the U.S. She is important to all of us, including our families, and that is why we need her to stay with us.

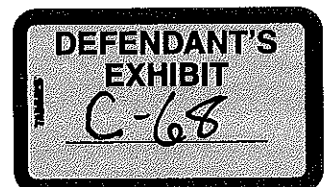
Please take all this into consideration and grant leniency. Thank you.

Sincerely,



Mariam Obaid

February 16, 2015



Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmae Odeh, whom I know well as the Associate Director of the Arab American Action Network (AAAN) in Chicago, and as the best community organizer I have ever met. She is the one who created the AAAN's Arab Women's Committee (AWC), the community project that changed my life and the lives of hundreds of other Arab immigrant and Arab American women.

My name is Maysoon Gharbieh. My family and I participate and benefit greatly from the AAAN and AWC. I first met Rasmae when she held a meeting for parents to discuss the challenges that our children were facing in school. I learned about the AAAN's programs that empower families, and my whole family became members and participants that very day. My teenagers joined the high school youth leadership development program; my youngest joined the after school homework assistance and tutoring program; and I joined the AWC, as well as registering in English as a Second Language classes.

Rasmae provided a safe environment and family atmosphere that is based on mutual understanding and respect, helped me and the others to protect our children from the risk of joining gangs or other dangerous activities, and helped us to better communicate with our children. She structured the AWC to provide leadership development for us, as well as promoting self-reliance and self-esteem. She helped us understand how to work with our children to help reduce the cultural gap between immigrant parents on one hand and the American-born children on the other. All of this is training for us to become active and productive citizens of our new country.

Rasmae is a valuable and lovely icon for us and for the entire community. She works hard without reward or personal profit. All she cares about is supporting and protecting us and our families. Her ultimate goal is to help develop families that are educated, active, and effective in contributing to keeping the community and the country safe for all who live here.

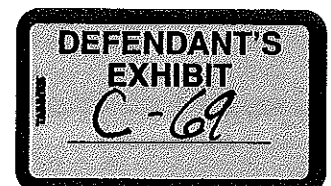
Honorable Judge Drain, Rasmae helps everyone who needs it, and even those who do not ask for it. She is almost 68 years old and has major health issues, which worry us who love and respect her. She has suffered greatly, faced torture and rape, and in spite of that, she converted her cruel experience into humanitarian work in our community. None of us would have been able to accomplish what she has if we had lived her history.

Rasmae suffers from Post-Traumatic Stress Disorder, and being locked in an isolation cell, when she was arrested last year, aggravated the physical and psychological symptoms of her condition. She may face deportation, which would mean the end of her relationships with her family, friends, and the women of the AWC. This punishment alone would bring her a significant amount of suffering. Please do not add to the suffering with jail time.

We know that Rasmae and her legal counsel plan to appeal her conviction, so keeping her out of jail while that happens would allow her to continue her valuable work for all of us and extend her positive impact on our country. She is no threat to society; she is an incredible person who has empowered all of us as immigrants to be the best residents and citizens of the U.S. that we can be. Please show her leniency in your sentencing.

Respectfully yours,

*Maysoon.m*  
Maysoon Gharbieh  
February 16, 2015



Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, whom I have know well since 2004, when she visited from Michigan and decided to stay in Illinois to help and support the community. My name is Halima Ahmad, and I am writing on behalf of the Arab Women's Committee (AWC) and all the women who know Rasmea in our community. I am now over 40 years old, and a single mother to 5 children after my husband passed away from a heart attack. When I first came to the U.S. over 20 years ago with my husband, I felt miserable and lonely; I didn't have family or friends. Everything around me was strange; the city, the people, the culture, and the language. I couldn't do anything for myself. Even when my first child was born, I couldn't take him to the doctor until my husband got home.

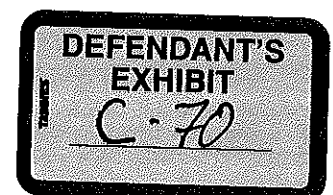
When I met Rasmea, everything in my life changed. She offered her support to help other women and me identify our needs. She provided support and assistance to help break our isolation, and to become independent, active members in the community and in society as a whole.

Ever since the Arab Women's Committee was created by Rasmea in 2004, it has provided us a safe environment and a family atmosphere that is based on understanding and respect. She is amazing, never tiring of giving us all her time, effort, and experience, so that we can become empowered as leaders, and meet our personal and community goals. She knows that strengthening women and mothers is the basis for strengthening the Arab American community in general.

On a personal level, I enrolled in English as a Second Language (ESL) and civics classes that the Arab American Action Network (AAAN) offered, which helped me to pass the citizenship exam. At the same time I participated in all the training and activities that Rasmea provided to us. The women built relationships with each other, and engaged in active and constructive discussions about U.S. society and how to communicate with people outside my community. These conversations led to the Arab Women's Writing Project, which trained 10 women in writing, reading, editing, and performance.

Rasmea has incredible charisma and strong leadership characteristics. She lives very modestly and devotes almost all her free time and energy to the AWC. Rasmea affects all members of the community positively. She is a lovely, kind, and empathetic person. She is a mother, sister, and daughter to all of us. We can't imagine how our lives would be without her and her support.

Rasmea gives me the foundation and confidence to go forward in my life, as she does for everyone that knows her. I learned how to drive, received my driver's license, graduated from ESL classes, and then enrolled in classes at Moraine Valley Community College.





Rasmea has impacted me as a student, mother, housewife, and woman participating in the broader community. The AWC created a bridge into society and opened up so many opportunities for myself and the other women. She changed my life and my understanding of what it means to be an active woman. I learned how to take care of my family, my community, and myself. I became encouraged and motivated to learn the skills to become a leader, which fulfills some of my goals and objectives.

All the women in the committee gain strength from one another; we share stories of our difficulties, pain, laughter, and transitions to American society. Through the workshops, we learned our rights as women and wives, how to build communities, and how to make sure that we are part of the decisions that affect our lives.

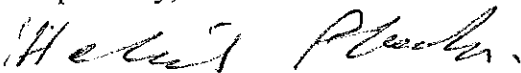
With Rasmea, I have been given "wings" to make myself be heard. I gained strength, and as a result, became a new person who cared so much for health issues, like breast cancer, heart disease, and emotional issues as well. In addition, I learned about the community and city, and how we have an important voice of change in society.

Rasmea has changed my life for the better. I have the full responsibility of five children, without a husband. I appreciate that Rasmea wasn't judgmental of me as a single mother. She wanted me to be strong and lead, and I did just that, connecting with other communities, such as the African American, Latino, and Asian ones, and helping to lead exchanges.

Please Judge Gershwin, grant leniency to Rasmea. If she loses her appeal, she will likely be stripped of her citizenship and deported, resulting in an elderly woman having to start her life over and permanently separate from family, friends, community, and us. This is devastating enough without compounding it with a prison term.

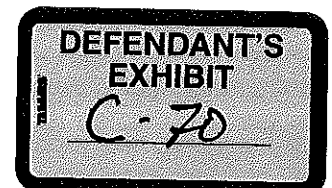
The members of the AWC believe that Rasmea has suffered enough, and we ask you to consider this when imposing your sentence.

Respectfully,



Halima Al-Rashdeh

February 12, 2015



To Whom It May Concern,

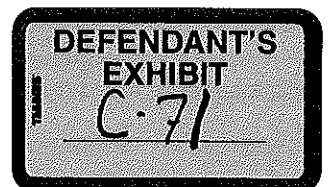
I am writing in support of Rasmia Odeh and to suggest that decisions about her future should be based on a full understanding of her situation and, therefore should be lenient. I am a professor and scholar of criminology and my work has focused on issues of incarceration and criminalization of women who have faced abuse and torture. It is from that perspective that I offer this advice.

Ms. Odeh is an aging woman whose life has been characterized by tensions associated with political conflict and injustice. There are hundreds of thousands like her around the world (including in the US) in similar situations; entrapped and used as pawns in political dramas. In fact, it could be said that Ms. Odeh was "made an example of" to deter other Arab women from being involved in work to better their community in their home country. And then persecuted in the US. Despite her important work in Chicago with several social agencies and community based organizations, she was harassed and arrested for her involvement years earlier in Palestine prior to her arrival in the US. Not unlike other women of her generation who were active in that region, her treatment prior to coming to the US was characterized by physical, mental and sexual torture that resulted in a coerced confession for crimes that she did not commit. This kind of activity on the part of the police, the military and others who work for state governments is unfortunately not atypical. There is an impressive amount of data on just how frequently women are forced to confess to crimes or exaggerate their involvement in illegal activities during political conflict. In my own research, I have found solid evidence that women whose situation is like that of Ms. Odeh are filling jails and prisons NOT because of what they actually did, but because they are victims of aggressive force by police and/or the military. Her case is a clear example of how women are coerced and tortured. Still, she was found guilty and now facing punishment that is out of proportion to the risk that she poses.

Ms. Odeh is not a threat to public safety; in fact she is a model citizen who made important contributions to US society through her community work. She has strong beliefs and uses those to inspire others NOT to cause harm. She is compassionate, not dangerous. Ms. Odeh is an honest woman of strong character and deserves to have that taken into account at this stage in her criminal case. Excessive fines, further incarceration or sanctions, and/or deportation are excessive and unjust punishment. Instead, I am hopeful that she will be granted leniency at this point. She has suffered enough and there is no evidence that she will ever pose a risk or create harm in the future.

Thank you for your effort to interrupt the injustices that Rasmia Odeh has faced.

Beth E. Richie, PhD  
Professor and Author  
Chicago, Illinois





DETROIT AND MICHIGAN CHAPTER  
**NATIONAL LAWYERS GUILD**  
ESTABLISHED 1937



February 25, 2015

Honorable Gershwin Drain  
United States District Court  
for the Eastern District of Michigan  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 673  
Detroit, MI 48226

RE: United States vs. Rasmia Odeh  
Case No. 13-20772

Your Honor:

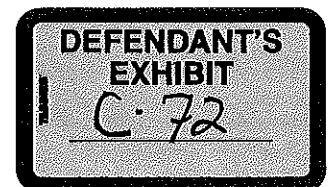
I write in my capacity as the President of the Detroit/Michigan Chapter of the National Lawyers Guild (NLG). This letter has been approved by a majority of the Board of Directors of our Chapter, and I believe it to be supported by a majority of our membership.

The NLG is an organization that has been dedicated to the principles and values of human rights and social justice for over 75 years. Based upon our history, we wish to bring to your attention several factors with regard to Ms. Odeh's sentencing which we believe are significant.

Of course her conviction presupposes her guilt. However, the Court can and should take into account several critical equitable factors when it imposes its sentence:

First and foremost is her history of oppression and indignity. Driven from her birthplace as a very young child, she struggled to overcome that legacy through education and devotion to family. Then, in 1969, she was arrested and tortured by Israeli military forces. As this Court acknowledged, "(t)he Court of course agrees that the use of torture and rape are antithetical to the concepts of fairness, due process and basic human rights. Moreover, the Court accepts as credible Defendant's claims of torture and is not unaffected by the inhumane circumstances of her detention in the West Bank." (Doc #117 at 7);

Second, since she has lived in the United States, Ms. Odeh has served as an inspiration to countless women, particularly Arab women who have been the victims of domestic violence. She has also been both a role model and guide for countless other Arab women immigrants to the United States who have struggled with a new and strange society; and

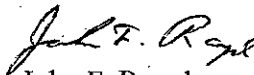


Finally, she is 67 years old and in frail health. She is without family nearby, other than her two nephews, and if sent to prison, she will suffer from an unusual and acute form of solitude.

Consequently, we ask that this Court exercise the leniency that is within its authority. Ms. Odeh neither needs nor should be asked to serve any additional time behind bars. Her sentence can be effectively and productively served under Government supervision, as she continues to serve the community she has served so effectively for so many years.

Thank you for your attention to our concerns.

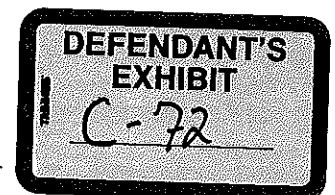
Respectfully,



John F. Royal

President

Detroit/Michigan Chapter, National Lawyers Guild



**Dr. Lisa Hajjar**  
Sociology Department  
University of California-Santa Barbara  
Santa Barbara, CA 93106  
805-236-4144; [lhajjar@soc.ucsb.edu](mailto:lhajjar@soc.ucsb.edu)

**RE: Statement about Israeli military courts in the occupied territories**

I am a full professor in the Sociology Department at UCSB. I have been asked to provide an expert statement about the Israeli military justice system in the occupied territories for a case involving Rasmia Odeh, who was arrested in 1969 and convicted in 1970. This statement is based on my extensive research on the Israeli military court system. My book, *Courting Conflict: The Israeli Military Court System in the West Bank and Gaza* (University of California Press, 2005), is the only book-length scholarly study on the subject.

Historical Background and Basics

The Israeli military court system in the West Bank and Gaza was established three days into the Six Day War in 1967. It is the criminal/legal component of the military administration that Israel has used to govern Palestinians in these regions occupied during the war with the surrounding Arab states. After the 1967 war, one-third of the population living under Israeli rule was Palestinians from the occupied territories.

For the first several years of the occupation, there was little resistance to the occupation among Palestinians. Nevertheless, as early as 1969, the Israeli military employed militarized violence and collective punishment across the territories (see <http://unispal.un.org/UNISPAL.NSF/0/7813B07830BDC77705256560006A7CB0>). In 1970 – 1971, the Israeli military undertook a “pacification” campaign. The imposed quiescence provided the authorities with the latitude to expand the use of the military court system.

Three bodies of legislation are enforced through the military courts: original Israeli military legislation, the British Defense (Emergency) Regulations of 1945 (promulgated during the British Mandate of Palestine), and local criminal laws (Jordanian in the West Bank and Egyptian in Gaza). Israeli military orders constitute the main body of law regulating the operation of the military courts. They also designate specific offenses. Between 1967 and the early 1990s, the Israeli military had legislated over 1,300 orders for the West Bank and over 1,000 for Gaza. The criminal provisions of the British Defense Regulations outlaw membership in an “illegal organization,” which, in this context, has included all Palestinian nationalist organizations.

Military courts of the first instance are distinguished by the number of judges (one or three) and the maximum sentencing power. Three-judge courts are empowered to pass sentences up to the maximum of life in prison or the death penalty. There are also

DEFENDANT'S  
EXHIBIT

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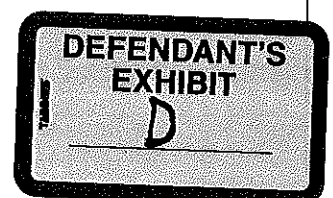
military courts attached to prisons and detention centers to handle hearings for extension of detention and appeals against administrative detention. There was no military court of appeals until 1989; prior to that, convicted Palestinians' only recourse was to appeal to the military governor of the region (West Bank or Gaza). No decision of a military court has status as a legally binding precedent. Consequently, there is a great deal of disparity in the sentences issued for similar crimes.

In terms of its function as a *legal* system, the military courts have never met the baseline standards of due process, and certainly not during the first years of the occupation. Problems include the use of soldiers in a policing capacity, and the complexities, contradictions, and vagaries of the laws enforced through the courts. Moreover, there is no basis in law or practice for the presumption of innocence. Rather, the three-pronged practice of arrest, interrogation and prosecution is premised on a presumption of guilt. This is evident in the fact that any soldier can arrest any Palestinian for the slightest suspicion or cause without warrant, and once arrested, people can be held for prolonged periods incommunicado before being granted access to an attorney. There is no legal requirement that a Palestinian's arrest be preceded by a detention order, or that a person be informed of the reason for arrest at the time he or she is taken into custody.

The presumption of guilt is further confirmed by the pervasiveness of torture and abuse, as well as a general pattern of prolonged denials of lawyer-client meetings, judicial concession to prosecutors' requests for extension of detention, and refusal to release detainees on bail. While, technically, there is a provision for *habeas corpus* (challenging the lawfulness of an arrest and the necessity of detention), in practice this is treated by Israeli military authorities as a request for release on bail, and bail is almost never granted. In most cases, people are detained throughout the entire duration of proceedings until their case is concluded.

A Palestinian who is arrested can be held in custody for up to 18 days without charges before being brought before a judge. This breaks down as follows: 96 hours of detention on the order of any soldier, and two seven-day extensions of detention on the order of police officers, usually at the request of the GSS. Following the initial 18 days, detention can be extended by order of a judge. Extension-of-detention hearings usually take place at court facilities in prisons, although sometimes extension hearings take place in regular military courts. Typically, prosecutors request an extension of detention when the interrogation has not been completed (i.e., the person has not confessed), or when the authorities have not had time to act on the confession (e.g., arresting people implicated in the detainee's statement).

Although in principle, detained Palestinians have the right to meet with a lawyer, lawyer-client meetings tend to be prohibited as long as the person is undergoing interrogation. Provisions in military legislation can prohibit detainees from any access to lawyers for up to 90 days. Interrogators have the authority to prevent a lawyer-client meeting for up to 30 days (two 15-day periods, the second on the order of someone of higher rank than the person who ordered the first period). Following that, a military judge



can issue another 30-day order barring the meeting, and a third 30-day order can be issued by the president or acting president of a military court.

Since 1967, hundreds of thousands of Palestinians have been arrested by the Israeli military. Not all Palestinians who are arrested are prosecuted in the military court system; some are released following interrogation, others are administratively detained without trial. According to a widely acknowledged rule-of-thumb, approximately fifty percent of Palestinians who are arrested are released or administratively detained without charges, and the other fifty percent are charged with crimes and prosecuted. Of those who are charged, approximately 90-95 percent are convicted. Over 97 percent of all cases in which charges are brought are concluded through a plea bargain rather than a trial.

While plea bargaining is common in many criminal justice systems, in this system it must be understood in light of the interrogation process and the evidentiary weight of confessions. The primary or only evidence in the vast majority of military court convictions are confessions (first- and/or third-party) extracted during interrogation. The Israel Defense Forces and the police conduct some interrogations, but the main agency responsible for interrogation of Palestinians is the General Security Service (GSS, also known by its Hebrew acronyms Shin Bet or Shabak). Interrogations feed the legal process by procuring confessions that are then turned over to police and prosecutors.

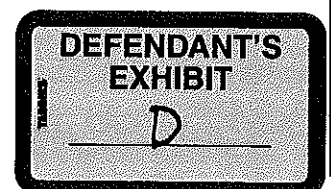
#### Israeli torture and cruel treatment in the interrogation process

With the expansion of the military court system after the “pacification” campaign, demands for forms of evidence that would hold up in court increased. Consequently, interrogation was increasingly aimed at producing confessions. By 1970, the complete isolation—and thus effectiveness—of interrogation as a component of the legal process had been achieved.

Since 1968, Israeli and Palestinian defense lawyers working in the military court system reported claims by their clients of beatings, electric shock, death threats, position abuse, cold showers, sexual abuse, sleep deprivation, and denied access to toilets. In 1970, the Israeli publication *Zu Ha-Derech* reported a new policy to discourage military courts from investigating the conduct of interrogators: “Noting the importance and vitality of [the GSS’s] security responsibilities in this area, it is the duty of the court to avoid disturbing them in their tasks” (quoted in Amad 1973: 19).

Reports about Israeli interrogation methods that claimed the routine use of torture and ill-treatment were condemned by officials as anti-Israel lies and smears, and refuted by arguing that such claims were based on pernicious fabrications by Palestinians and other “enemies of the state.”

Although the number of Palestinian women and girls who have been arrested and interrogated is miniscule in comparison to the number of men and boys, it nevertheless numbers in the thousands (see Antonius 1980; Fahum 1984; Ghanem 1995). Palestinian females who are arrested are subjected to many of the same interrogation methods as

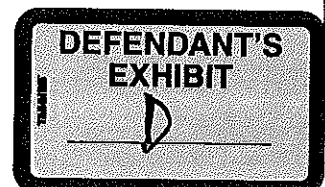


males. They also can be subjected to special methods that capitalize on their gender, such as sexual harassment and abuse, rape, and techniques that manipulate notions of “female honor” and women’s feelings for their family members, especially their children (Thornhill 1992). From the beginning of the occupation, the threat of interrogation as a “dishonoring” experience was exploited by the Israeli military authorities to inhibit Palestinian women’s participation in national politics. Many incidents have been reported of women and girls being detained and brought to interrogation centers where they are threatened or abused to pressure male family members to confess.

Women prisoners also have been used instrumentally in the interrogation of male prisoners. Torturing women in front of men is a means of pressuring men to confess to “save” women from further abuse. This dates back to the early resistance by *feday'in*. Fadl Yunis, in his prison memoir titled *Cell Number 7*, describes an experience of a Palestinian woman commando, stripped naked being interrogated in front of him. He writes, “Tears came to my eyes, but she said, addressing me in a collected voice: ‘Don’t worry brother. It doesn’t matter that you see me naked. After all, you’re my brother... and I’m your sister’” (quoted in Harlow 1992: 36).

Both the discourse and practices of interrogation underwent a qualitative change following the 1977 publication in *The Sunday Times* (London) of a detailed inquiry into “Arab allegations and official Israeli denials of the use of torture.” The *Times* reported, “Torture of Arab prisoners is so widespread and systematic that it cannot be dismissed as ‘rogue cops’ exceeding orders. It appears to be sanctioned as deliberate policy.” The Israeli government, through its embassy in London, ridiculed the findings and conclusions of the article as “fantastic horror stories” in a response on July 3, 1977. But Prime Minister Menachem Begin ordered a curtailment of violent interrogation tactics in Israeli prisons and detention centers. As a result, for the next several years, allegations of torture declined. To compensate, beginning around 1979 the GSS developed a new technique to gather information and extract confessions: the procurement and use of Palestinian collaborators (*‘asafir*, literally “birds”) in prisons.

In 1987, new and conclusive information about the history of Israeli interrogational torture came to light. It began in the aftermath of two scandals involving the GSS—the summary execution of captured Palestinians who had hijacked a bus, and a charge by a Circassian Israeli soldier that he had been tortured to elicit the confession that had been used to prosecute him (for treason). These events prompted the government to appoint an official commission of inquiry to investigate illegal activities by the GSS. The commission was headed by Moshe Landau, a retired justice of the High Court of Justice (HCJ). Among its findings, the Landau Commission report confirmed that GSS agents had used violent interrogation methods routinely on Palestinian detainees since at least 1971, and that they had routinely lied about such practices when confessions were challenged in court on the grounds that they had been coerced. The Landau Commission was harsh in its criticism of GSS perjury, but adopted the GSS’s own position that coercive interrogation tactics are necessary in the struggle against “hostile terrorist activity.” The Landau Commission accepted the broad definition of terrorism utilized by





the GSS, which encompasses not only acts or threats of violence, but virtually all activities related to Palestinian nationalism.

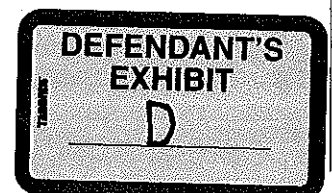
The Landau Commission argued that Israeli penal law could be interpreted to give interrogators license to continue the use of "moderate amounts of physical pressure" as well as various forms of psychological pressure as part of the fight against terrorism. The legality of such "pressure," the Commission reasoned, could be justified under the "necessity defense," which permits people to use violence in "self-defense," thereby mitigating criminal liability on the grounds that they are acting to prevent grievous harm. The specific interrogation methods that the Landau Commission recommended were contained in a classified appendix to the report.

In November 1987, the Israeli government adopted the Landau Commission's recommendation to authorize the use of "moderate physical pressure," making Israel the first state in the world to publicly sanction interrogation methods that constitute torture according to international law.

Following the publication of the Landau Commission report in 1987, lawyers mounted a protracted litigation campaign in the HCJ to challenge the legality of violent interrogation tactics used on Palestinians. In 1990, a group of Israeli lawyers and human rights activists formed the Public Committee against Torture in Israel (PCATI) to spearhead a campaign to end the use of torture. This litigation, along with the hundreds of petitions by lawyers representing Palestinian prisoners, forced the state to admit or acknowledge that permissible methods included the routine use of threats and insults, sleep deprivation, hooding and blindfolding, position abuse, physical violence (including "shaking" which produces a whiplash effect and leaves no physical marks), solitary confinement (including in refrigerated or overheated closet-like cells), and subjection to excessively filthy conditions. In 1993, in response to the litigation, the Israeli government reported that the GSS had modified its longstanding interrogation procedures, although these changes remained classified.

In January 1998, the HCJ combined a number of petitions pertaining to interrogation tactics, and convened a panel of nine justices to consider the matter. On September 6, 1999, the HCJ rendered a decision in *PCATI v. State of Israel* (HCJ 5100/94) prohibiting GSS agents from routinely using physical "pressure," although the decision neither called these tactics "torture," nor completely closed the window of opportunity for their continued use under exceptional circumstances. After the ruling, some methods all but disappeared (e.g., violent shaking, covering a detainee's head with a thick cloth sack, exposure to extremely loud and constant music, and tying to small tilted chairs). But other methods, including sleep deprivation, position abuse and painful shackling, exposure to extremes in temperature, and intense pressure applied to various body parts remain common practice.

Approximately 85 percent of arrestees are interrogated, and interrogation places Palestinians into conditions of discomfort, pain, humiliation and threats, from which there is no exit until the interrogation ends or the detainee provides information to the



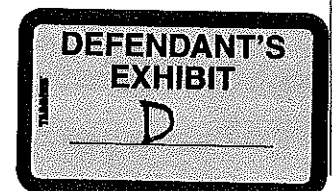
interrogators' satisfaction. In 1993, the Gaza Community Mental Health Programme published findings of a survey study based on a sample of 477 ex-prisoners who had spent between six months and ten years in prison. Of this total, 91.7 percent had spent five years or less in prison, meaning that they were convicted of minor crimes. The findings revealed the incidence of specific interrogation methods on the following percentages of the sample: beatings (95.8); exposure to extreme cold (92.9); exposure to extreme heat (76.7); prolonged standing (91.6); applied pressure on the neck (68.1); food deprivation (77.4); solitary confinement (86); sleep deprivation (71.5); intense noise (81.6); verbal humiliation (94.8); threats against personal safety (90.6); forced witnessing of torture of other detainees (70.2); applied pressure on testicles (66); electric shock (5.9); tear gas (13.4); pushing instruments into the penis or rectum (11.1); witnessing torture of family members (28.1); threats of torture or rape of female family members (27.9). Other studies and investigations of interrogation tactics have generated similar findings.

### Prosecution

Once the interrogation is finished, if there is a confession and/or other forms of evidence to charge the detainee, the prosecutor prepares the charge sheet and the legal process begins. If a confession is the main evidence, the prosecutor needs an additional *scintilla* (*dvar ma* in Hebrew). In this court system, the *scintilla* could be the protocol of the extension of detention hearing; if a detainee did not tell the presiding judge that s/he is "innocent," the prosecutor could use this as an admission of guilt. Given that detainees often are not represented by counsel at extension-of-detention hearings, many are unaware that declaring their innocence is an option. Corroborating evidence also can include the testimony of an arresting soldier, general information that a particular event for which the defendant is being charged actually occurred, or secret evidence.

Whereas in the domestic Israeli criminal justice system a confession must pass certain logical tests to ensure that it was not "invented" by the accused, such as a *scintilla* that the accused had the opportunity to commit the crime, or that the confession does not contradict other types of evidence, in the military court system the *scintilla* does not have to corroborate the confession or even to implicate the accused directly. All it has to show is a *possible* connection between the accused and the crime. Even if a defendant subsequently rescinds a confession on the grounds that it was coerced, or other exculpatory information becomes available, according to the rules of evidence that apply in this system, the court has the option to retain--and prefer--the confession over other evidence.

In principle, a defense lawyer can challenge a confession that a client claims was coerced by calling for a *zuta* (*voir dire*; often called a "mini-trial" or a "trial-within-a-trial"). This entails a hearing *in camera* in which a judge hears testimony from the defendant, the interrogators, and any others who might have relevant information (e.g., police, prison guards and doctors). But for such a challenge to succeed, the judge would have to consider the testimony of the defendant more credible than that of the interrogators. Since 1967, there are almost no instances in which a judge threw out a confession as a result of a *zuta*, and most defense lawyers are disinclined to utilize this



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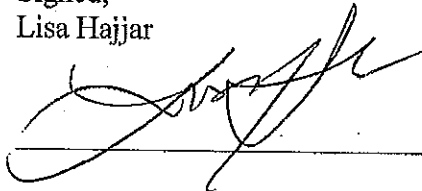
procedure because the client can face greater punishment as reprisal for "wasting the court's time."

Secret evidence is always the basis for extra-judicial incarceration (i.e., administrative detention). Within the military court system, prosecutors can use secret evidence as a basis for charges. Much of the evidence classified as "secret" comes from Palestinian collaborators. The collaborator network forms an integral part of the state's resources to gather incriminating information that can be used to detain, charge and prosecute suspects. Secret evidence is unavailable to either the defense lawyer or the defendant, which means that the defense is afforded no opportunity to know the contents or contest the veracity of the evidence directly.

Overwhelmingly, the legal work that transpires in the military court system involves plea bargaining. Defense lawyers and prosecutors negotiate over the charges and the merits of evidence in a case in an effort to come to an arrangement on the sentence. For the defense, the incentive to plea bargain is a negative one: it assumes the likelihood of defeat at trial with the consequence of a higher sentence. For the prosecution, the incentive is a positive one: it provides an assured conviction of the accused, saving the time, effort and resources that a trial would entail. In many criminal court systems, plea bargaining is the routine and predominant way to resolve most cases. However, the prevalence of plea bargaining in this system must be understood to derive, in large part, from the myriad advantages that prosecutors enjoy. These advantages include administrative and legal provisions that permit the holding of detainees incommunicado for prolonged periods and impede lawyer-client meetings, the prevalent and routine use of coercive interrogation tactics to obtain confessions, the evidentiary weight of confessions and difficulties in challenging them in court, the use of "secret evidence" that is unavailable to defense lawyers or defendants, and a general tendency on the part of judges to accept prosecution evidence and prefer it to exculpatory evidence or contradictory testimony from defendants and defense witnesses.

In my expert opinion, during the period between 1967 and 1975, the Israeli military courts in the occupied territories did not operate in a manner consistent with basic due process or fundamental fairness.

Signed,  
Lisa Hajjar



Date

7/22/14

Subscribed and sworn to before me

this 22<sup>nd</sup> day of July 2014



Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

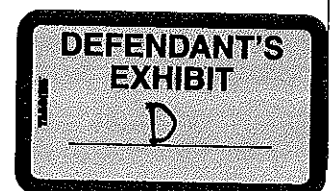
TAMICA C. GOODSON, Notary Public  
Susquehanna Twp., Dauphin County  
My Commission Expires October 6, 2014

DEFENDANT'S  
EXHIBIT

D

## Bibliography

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February 9, 2015

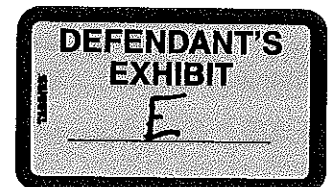
Addendum to the Affidavit of Mary Fabri, PsyD  
July 18, 2014

**Qualifications:**

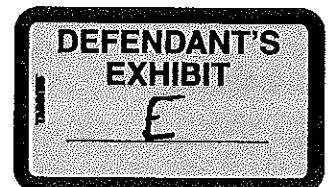
1. Please refer to original affidavit of July 18, 2014.

**Background Information:**

2. Mr. Michael Deutsch, attorney for Ms. Rasmea Odeh, requested a follow up assessment of Ms. Odeh's mental health functioning following a month long detention (11/10/2014-12/11/2014).
3. A two-hour Skype interview with video was conducted on January 9, 2015 between this evaluator in Chinle, AZ and Ms. Odeh in Chicago, IL.
4. The assessment included a diagnostic interview and the readministration of the Posttraumatic Stress Checklist (PCL-5).
5. During the diagnostic interview, Ms. Odeh related the following information about the recent detention following the guilty verdict in the unlawful procurement of naturalization on November 10, 2014.
6. Ms. Odeh stated that she had not expected to be taken into custody immediately following the guilty verdict. She expressed feeling overwhelmed when hearing the verdict and then having handcuffs and feet restraints placed on her wrists and ankles. She described being treated roughly and was bruised by the treatment.
7. She recounted being transported to the jail in a van with other prisoners, arriving late, and being subjected to what she called an "inhumane body search," describing that it was demanded that she take all her clothes off and to bend over so that her body cavities could be examined. Ms. Odeh stated, "I could not accept that, it affected me a lot."
8. Ms. Odeh stated she was eventually taken to her cell where only the top bunk was unoccupied. She told the guard that it would be difficult to get to the top bunk and recalled the guard told her to pull the mattress onto the floor.
9. After several days, Ms. Odeh reported that a guard came to her and expressed concern about a newspaper article about her case. She was then moved to another section of the jail being told that there was concern about how prisoners might behave towards her.



10. Ms. Odeh described the new area as "very, very cold" and that the toilet and seating was made of metal and was also cold and uncomfortable. She described at her age, it is difficult to tolerate such cold. She stated she was allowed to purchase an extra t-shirt and blanket, but it was not enough to fight the cold.
11. She was moved a second time and told her cell was needed and was brought to yet another section of the jail where she did not know anyone. Ms. Odeh described a situation that took place when she was in the new section's dayroom with other prisoners. She stated she was still feeling cold and that she did not want to sit down and preferred to keep walking. She stated she saw something on a glass window and went to look, she reached to touch it and a guard began "yelling" at her. She described asking the "guard not to scream" at her and being returned to her cell and locked in.
12. Ms. Odeh stated a prison "sergeant" came to her cell and held a piece of paper up to the "glass" and told her to read it, saying, "This is court for you, read the accusation." She reported she could not read the handwriting on the paper and requested that it be read to her. She was told that she was not respectful of the prison rules or the guards and she was being punished, receiving a 2 on a 1 to 4 scale, with 1 being the most serious.
13. Ms. Odeh declared she felt confused, stating she had been given the rules when she entered and that she had read them carefully. She stated she was told that she did not go to her cell immediately when ordered and did not go to the common room when told.
14. Ms. Odeh reported that she asked the "sergeant" to listen to her side along with the guard's. She stated she tried to explain that she saw something on the window and went to investigate, asked the guard not to "scream" at her, and then did go to her cell, but had to walk around groups of people to get there. The "sergeant" then changed her punishment rating from a 2 to a 3, and told her she would be confined to her cell for six days.
15. She stated that she protested to the sergeant, calling it unfair, but he had her open her cell door and removed all her belongings with the exception of the mattress, sheet, and blanket. Ms. Odeh declared, "This is punishment, I don't agree."
16. She reported the punishment went beyond six days and she did not understand. She stated she asked a guard why she was still "locked up" and described not being allowed to communicate with anyone, she could not send letters or make phone calls, and was not allowed to have her usual soap and shampoo. Ms. Odeh stated that no one responded to her inquiry, so she told the guard she would refuse food and medicine, and she wanted to speak to someone.
17. Ms. Odeh stated a different "sergeant" came to speak with her and that she was told that she had been given an extra three days by a guard who had the right to evaluate her behavior. Ms. Odeh reported she asked what she had done, the "sergeant" did not know, and asked the present guard who also said she did not know.
18. Ms. Odeh reported yet another three days passed and that she demanded to talk with someone. She stated a different "sergeant" came and left without explaining why she was remaining in her cell without contact with others.



Ms. Oden described feeling like she was "going crazy, [I] cannot speak to anyone, [I] cannot write to anyone, [I] cannot communicate with anyone."

She stated she felt "very, very cold, could not eat or sleep," and felt "pain all over, even in my bones." She described that at times she felt that she "cannot breathe."

19. She also reported that another prisoner placed in a cell in the same area "screamed constantly," and stated it was making her feel agitated. She called to a guard and told her, "We are human. No one is helping us. You want to destroy me. Okay, I will help you, I will kill myself." Ms. Odeh declared to this evaluator, "I felt as bad or worse than in the Israeli jail."
20. Ms. Odeh stated a "sergeant" came after that and opened her door and came inside to talk with her. She stated he listened to her for a long time. He told her he would come back because he did not know why she was given extra days.
21. Upon his returned, she reported she was told that she is "high profile and in isolation for her own protection." She stated she told him that it was a "big lie," and his response was that she is talked about in social media, the prison is receiving calls about her, and there are articles in the newspaper. Ms. Odeh reported that she asked, "How are you protecting me in isolation? I am not sleeping. I cannot eat anything. If you want to help me, you have to let me out." She stated his response was to tell her, "Whatever happens to you in the cell is not my responsibility. If a prisoner does something to you, it is my responsibility." Ms. Odeh stated she asked to call her lawyer, Mr. Deutsch.
22. Ms. Odeh reported she remained in isolation until she was released, that she was not sleeping, and felt like there was a "fire in my head, like it would explode."
23. She described being in the cell for 23 out of 24 hours and that usually between midnight and 2:00 a.m. she would be allowed access to a shower and to be out of the cell for one hour. She stated, "It was when others are locked in their cells."
24. Ms. Odeh continued to describe feeling "very, very cold all the time" and that she would try to "warm" herself with thoughts of others, to try and feel something. She stated, "I felt like I was going mad and I would have done anything to stop the pain." When asked what kind of pain, she responded, "psychological and physical." She stated, "This [isolation] was overwhelming." She continued, "I felt like they wanted to lock me up and destroy me."
25. Ms. Odeh reported that she had no notice prior to her release, they told her to get her things together, was given clothes, and escorted to the van. She stated she did not understand what was happening and protested because she feared having to be subjected to the body cavity search upon her return.
26. She stated she was told she was going to court, and remembers feeling like she will not be able to deal with the process again, "I felt like I was going to explode," and had difficulty breathing.
27. Since returning to Chicago, her home, and work, Ms. Odeh stated, "I was dying there [jail cell] and now to come back to loved ones. It is not normal to go to hell. I was in hell."
28. Ms. Odeh posed the question, "What did I do? Twenty years here [in United States] as a good woman, what is happening?"

DEFENDANT'S  
EXHIBIT

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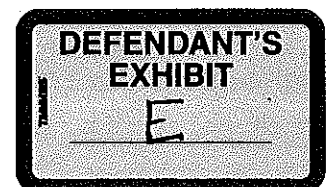
29. Ms. Odeh reported that she has scheduled appointments to see her physician and dentist for follow up regarding her health. She stated she has difficulty falling asleep at night; she cannot relax. She tries praying to help and it does sometimes. She also reported that she has returned to work and that it provides distraction during the day, but evenings are very difficult because that is when everything comes back to her.

**Behavioral Observations:**

30. Throughout the retelling of her experiences, Ms. Odeh was tearful and at times she appeared to be hyperventilating or having a difficult time getting her breath. Her affect was appropriate to the content of her words.

**Psychological Assessment:**

31. Ms. Odeh continues to manifest symptoms consistent with the diagnosis of Post Traumatic Stress Disorder, chronic type.
32. Ms. Odeh meets the criteria for Post Traumatic Stress Disorder. She had multiple direct exposures to traumatic events over her lifespan [Criterion A]; she describes intrusive thoughts and memories about the traumatic experiences, has physiological reactivity to distressing events including hyperventilation and difficulty breathing, and remains agitated for long periods activated by distressing events [Criterion B]; avoidance continues to be one of Ms. Odeh's primary strategies in coping with her history of trauma and describes work as being an activity where she "can lose" herself and the experience of isolation in the jail cell and being home alone at night are times of vulnerability for activation of PTSD symptoms [Criterion C]; Miss Odeh continues to have negative alterations in cognitions and mood which strikingly manifested during isolation in jail when she became mistrustful and convinced she was "being destroyed" and began to have suicidal ideation, and refusal of food and medication. Additionally, she manifests negative emotions directly related to past traumatic experiences, comparing her recent detention to her imprisonment in Israel [Criterion D]; Miss Odeh continues to have multiple symptoms related to arousal and reactivity with feelings of irritability and angry outbursts, difficulty concentrating, and a severe sleep disturbance [Criterion E].
33. The Posttraumatic Stress Disorder Checklist (PCL-5), a 20-item self-report measure that assesses the Diagnostic and Statistical Manual of Mental Disorders (DSM-5) was readministered. Ms. Odeh endorsed items based on the DSM-5 diagnostic rule which requires at least: 1 B item (questions 1-5), 1 C item (questions 6-7), 2 D items (questions 8-14), 2 E items (questions 15-20) that suggest PTSD. The results support a diagnosis of PTSD.
34. DSM 5 Diagnosis: 309.81 Posttraumatic Stress Disorder, Chronic

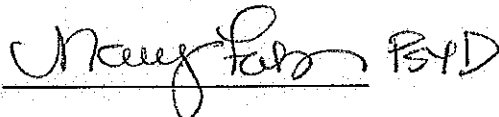




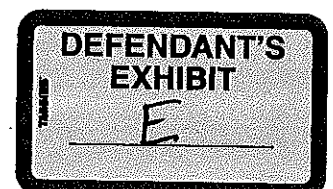
**Summary:**

35. Ms. Odeh continues to suffer from PTSD symptoms related to a history of trauma that includes forced displacement of family as a child, exposure to conditions of war and violence, arrest, interrogation, torture, and imprisonment in 1969 in Israel.
36. The recent arrest, trial, conviction, and imprisonment related to charges of providing false information on her naturalization application has resulted in a reactivation of PTSD symptoms. As previously stated, this is consistent with the findings of longitudinal studies in the regarding trajectories of PTSD and reactivation of symptoms over the lifetime. (Mollica, Caridad&Massagli, 2007; Solomon & Mikulincer, 2006; Marshall, Schell, et al, 2005; Eisenman, Gelberg, et al, 2003; Silove, Steel, et al, 2002).
37. PTSD is an enduring condition that has profound implications for emotional and physical health. Reactivation of symptoms result in severe stress reactions in the body and has been demonstrated in multiple studies that PTSD contributes to a higher prevalence of mental illness, hypertension, heart disease, and diabetes. [Ahmadi, Hajsageghi, et al, 2011; McFarlane, 2010; Kinzie, Riley, et al, 2008].
38. It is this evaluator's opinion, to a reasonable psychological certainty, that someone with chronic PTSD has a higher risk to develop serious health conditions that impact psychological and physical health as they age. Ms. Odeh falls in this category as a 67 year-old woman [DOB: 05/22/1947] with a history of multiple traumas and a diagnosis of chronic PTSD.

Respectfully submitted by:



Mary Fabri, PsyD  
IL License #071-003776



Northwestern University  
Feinberg School of Medicine

Division of General Internal Medicine  
Department of Medicine  
750 North Lake Shore Drive  
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Chicago, IL 60611-2927



February 23, 2015

To the United States District Court Eastern District of Michigan Southern Division,

I am writing this letter on behalf of Rasmieh Odeh who has been a patient under my care. I am a primary care physician who has been in practice for 13 years. I have evaluated Ms. Odeh twice, most recently on February 19, 2015.

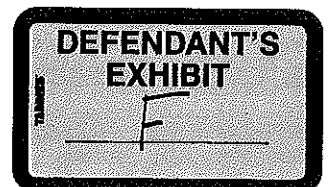
From my examination, it is evident that Ms. Odeh has posttraumatic stress disorder resulting from the time she spent incarcerated in Israel. Her emotional and physical health have also been negatively affected by her recent trial in Detroit, Michigan. During my examination of her, it was clear that she is experiencing significant mental and physical symptoms related to posttraumatic stress disorder. It is my opinion that if she is incarcerated, her mental and physical health will further deteriorate.

Please do not hesitate to contact me if you have further questions.

Sincerely,

A handwritten signature in black ink that reads "Namratha R. Kandula".

Namratha R. Kandula, MD, MPH  
Northwestern University  
750 N. Lake Shore Drive, 10th Floor  
Chicago, IL 60611  
Phone: 312- 503-6470  
Fax: 312-503-2755  
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(708)952-0000

February 4, 2015

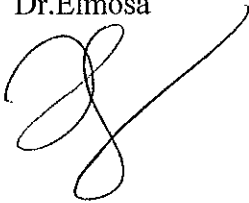
Re: Rasmae Steve

To Whom It May Concern:

Patient is undergoing full mandibular implant reconstruction. This will involve placement of four implant and alveolar reconstruction. As of today, this process will take six months to a year to complete.

Thank you,

Dr.Elmosa

A handwritten signature in black ink, appearing to be 'Dr. Elmosa', written in a cursive style.