
amnesty international

UNITED STATES OF AMERICA

Proclamations are not enough, double standards must end

More than words needed this Human Rights Day

2 December 2004

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10 December 2004 will mark the 56th anniversary of the Universal Declaration of Human Rights (UDHR). If recent history is any guide, President George W. Bush will issue a proclamation on or around that date, international Human Rights Day, in which he will reaffirm the USA's enduring commitment to fundamental human rights principles. He did so on 9 December 2001, 9 December 2002, and 10 December 2003.

If and when President Bush comes to sign his Human Rights Day proclamation this year, Amnesty International believes that an honest appraisal would require him to acknowledge that the USA has violated and undermined basic human rights principles and the rule of law during his first term in office and continues to be far from the global human rights champion it proclaims itself to be.

On 10 December 1948, the United Nations (UN) General Assembly proclaimed the UDHR as "a common standard of achievement for all peoples and all nations". The USA was one of the main movers behind the Declaration, and to this day claims to remain committed to the principles of this visionary document, from which today's body of international human rights law and standards has developed. The Department of State describes the USA's position thus:

"The protection of fundamental human rights was a foundation stone in the establishment of the United States over 200 years ago. Since then, a central goal of US foreign policy has been the promotion of respect for human rights, as embodied in the Universal Declaration of Human Rights. The United States understands that the existence of human rights helps secure the peace, deter aggression, promote the rule of law, combat crime and corruption, strengthen democracies, and prevent humanitarian crises."

The State Department explains that the USA seeks to "hold governments accountable to their obligations under universal human rights norms and international human rights instruments" as well as to promote the rule of law and greater respect for human rights.

Seeking to hold the USA accountable to its international obligations, meanwhile, is an uphill task. Over the years, this is a country that has repeatedly ignored or rejected resolutions and findings of international and regional bodies and experts, including the UN Commission on Human Rights, the UN Committee against Torture, the UN Human Rights Committee, the International Court of Justice, the UN Working Group on Arbitrary Detention, various UN Special Rapporteurs, and the Inter-American Commission on Human Rights. It has lodged unprecedented conditions to its ratifications of some human rights treaties and failed to ratify others. For example, although the State Department lists the promotion of children's rights as

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one of the USA's central policy goals, it is the only country apart from Somalia not to have ratified the UN Convention on the Rights of the Child.

In 2002, the USA sought to block adoption of the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment which will establish a system of international and national monitoring of detention facilities. The hiding by US agents of detainees from the International Committee of the Red Cross (ICRC) in Iraq, and the USA's denial of access to others held in secret locations or even some of those held without charge or trial at the US naval base at Guantánamo Bay in Cuba, suggest a government that does not look favourably on external scrutiny of its own actions. Yet it was President Bush who said in June 2003 that it is "notorious human rights abusers" who seek to "shield their abuses from the eyes of the world" by "denying access to international human rights monitors". Both before and after his statement, detainees in US custody were subjected to torture or other cruel, inhuman or degrading treatment in Afghanistan, Guantánamo and Iraq, with international human rights monitors, including Amnesty International, denied access.¹

The USA is the only state that is actively opposed to the International Criminal Court (ICC), while 97 countries have now ratified or acceded to the Rome Statute of the ICC which will seek to prosecute people accused of genocide, crimes against humanity and war crimes, where their home state is unwilling or unable to try them. Under the administration of President Bush, the USA has conducted a worldwide campaign to weaken the ICC and to obtain immunity for all US nationals from its jurisdiction. Under this campaign, the USA approaches governments around the world and asks them to enter into illegal immunity agreements. These agreements provide that a government will not surrender or transfer US nationals accused of genocide, crimes against humanity or war crimes to the ICC, if requested by the Court. The agreements do not require the USA or the other state concerned to investigate and, if there is sufficient evidence, to prosecute such a person in US Courts.

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In April 2003, the final report of a Pentagon Working Group on Detainee Interrogations in the Global War on Terrorism advised that some states with whom the USA had not entered into such agreements may "perceive certain interrogation techniques to constitute torture or inhuman treatment". Such states, the Working Group says, "may attempt to use the Rome Statute to prosecute individuals found in their territory responsible for such interrogations. In such cases, the US Government will reject as illegitimate any attempt by the ICC, or a state on its behalf, to assert the jurisdiction of the Rome Statute over US nationals without the prior express consent of the United States." In July 2003, the USA announced the withdrawal of military assistance to 35 states that are parties to the Rome Statute and have refused to sign an immunity agreement with the USA exempting US nationals from the jurisdiction of the ICC. Now Congress is threatening legislation that could cut development aid to governments that have not entered into immunity agreements with the USA.

In another of the US administration's now notorious "torture memos" that have come into the public domain since the publication of photographic evidence of war crimes committed by US soldiers in Abu Ghraib prison in Iraq, the Justice Department reminded the White House in August 2002 that "[a]lthough President Clinton signed the Rome Statute, the

¹ See *USA: Human dignity denied: Torture and accountability in the 'war on terror'*. AI Index: AMR 51/145/2004, October 2004, <http://web.amnesty.org/library/Index/ENGAMR511452004>.

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United States has withdrawn its signature from the agreement... effectively terminating it. The United States, therefore, cannot be bound by the provisions of the ICC Treaty nor can US nationals be subject to ICC prosecution.” The memorandum advised that, even if the ICC “could in some way act upon the United States and its citizens, interrogation of an al Qaeda operative could not constitute a crime under the Rome Statute.” The memorandum argued that “[e]ven if certain interrogation methods being contemplated amounted to torture”, the ICC would not have jurisdiction because the crimes would not amount to crimes against humanity and would not constitute war crimes because President Bush “has appropriately determined that al Qaeda members are... not entitled to the protections of any of the Geneva Conventions.”

President Bush’s refusal to apply the Geneva Conventions to those captured during the international armed conflict in Afghanistan and transferred to Guantánamo has caused widespread international concern, including from the ICRC, the leading authority on the provisions of international humanitarian law. The USA remains unapologetic, despite compelling evidence that its selective disregard for the Geneva Conventions contributed to the torture and ill-treatment of detainees in Iraq and elsewhere. Indeed, one of the architects of this policy, White House Counsel Alberto Gonzales, has been nominated by President Bush to be the next Attorney General without any indication that the administration has had second thoughts about its approach.

Five months after the US Supreme Court ruled that the federal courts have jurisdiction of the Guantánamo detainees – puncturing a central tenet of the administration’s “war on terror” detention policy – no detainee has appeared in court, a strong indication of a government stalling and applying a less-than-progressive interpretation of the Supreme Court’s decision. The administration reacted to the 8 November 2004 ruling by US District Judge James Robertson by lodging an immediate appeal. Judge Robertson’s order in *Hamdan v Rumsfeld* resulted in the suspension of US trials by military commission and concluded that all those picked up in Afghanistan should have been presumed to be prisoners of war until a “competent tribunal” determined otherwise, as required under the Third Geneva Convention. The outgoing Attorney General John Ashcroft subsequently condemned what he characterized as a “profoundly disturbing trend” of “intrusive judicial oversight and second-guessing of presidential determinations”.

The US administration has not only shown disdain for the courts but has also given short shrift to the concerns of international human rights bodies unless such concerns fit with its strategic aims or domestic political goals. For example, in its report, *A decade of defiance: Saddam Hussein’s Defiance of the United Nations*, released as a background paper for President Bush’s September 2002 address to the UN General Assembly during the USA’s build-up to the invasion of Iraq, the White House cited Amnesty International’s findings on torture in that country. When the alleged abuse has involved US agents involved in Iraq and the wider “war on terror”, the government’s response has been one of denial and disregard for the organization’s concerns.

In *A decade of defiance*, the White House listed “extended solitary confinement in dark and extremely small compartments” among the torture techniques used under the Iraqi regime. By the second half of 2003, the occupying US forces were employing the same technique. In its leaked February 2004 report on abuses by occupying forces in Iraq, the ICRC found that:

“Several military intelligence officers confirmed to the ICRC that it was part of the military intelligence process to hold a person deprived of his liberty naked in a completely dark and empty cell for a prolonged period to use inhumane and degrading treatment, including physical and psychological coercion, against persons deprived of their liberty to secure their cooperation...”

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Since June 2003, over a hundred ‘high value detainees’ have been held for nearly 23 hours a day in strict solitary confinement in small concrete cells devoid of daylight... Most had been subject to this regime for the past five months.”

Each year the US State Department issues reports on human rights practices in other countries, drawing on information published by non-governmental organizations and other sources. Under each entry there is a section on “torture and other cruel, inhuman or degrading treatment or punishment”. These entries show that the USA has been practicing what it condemns in other countries. The latest State Department report includes reference to the following techniques:

- China: “prolonged periods of solitary confinement, incommunicado detention, beatings, shackles, and other forms of abuse.”
- Egypt: “Principal methods of torture reportedly employed by the police and the SSIS included victims being: stripped and blindfolded...”
- Indonesia: “psychological torture cases reportedly included food and sleep deprivation, sexual humiliation”.
- Iran: “Some prisoners were held in solitary confinement or denied adequate food or medical care to force confessions.”
- Jordan: “The most frequently reported methods of torture included beatings; sleep deprivation, extended solitary confinement, and physical suspension.”
- Burma (Myanmar): “They routinely subjected detainees to harsh interrogation techniques designed to intimidate and disorient. There were reports in past years that prisoners were forced to squat or assume stressful, uncomfortable, or painful positions for lengthy periods.”
- Pakistan: “sexual assault; prolonged isolation...denial of food or sleep...”

Amnesty International welcomes the yearly human rights reports of the US State Department – under the UDHR the USA and other countries should engage themselves in promoting human rights and denouncing abuses wherever they occur. Such reports, however, are drained of moral power when the government making the criticism is itself sanctioning or turning a blind eye to human rights violations within its own jurisdiction. The same or similar techniques as those listed above have been alleged as having been used by US agents in the “war on terror”. The State Department’s latest entry on Cuba might draw particular accusations of hypocrisy. It notes for example, that:

“Prisoners sometimes were held in “punishment cells”, which usually were located in the basement of a prison, were semi-dark all the time, had no water available in the cell, and had a hole for a toilet. No reading materials were allowed, and family visits were reduced to 10 minutes from 1 or 2 hours. There was no access to lawyers while in the punishment cell”.

In the US Naval Base in Guantánamo Bay in Cuba during the same year, 2003, hundreds of men were held without access to lawyers or to families. Many detainees are reported to have been placed in isolation in punishment cells and had their “comfort items”, including religious items, removed.

On 30 November 2004, the *New York Times* reported that it had obtained a copy of a memorandum that quotes from an ICRC report of a visit to Guantánamo in June. The memorandum states that the ICRC had found a system in the Guantánamo prison camp under

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which detainees had been subjected to “humiliating acts, solitary confinement, temperature extremes, use of forced positions”, and the use of loud and persistent noise and music and “some beatings”. According to the New York Times, the report said: “The construction of a system, whose stated purpose is the production of intelligence, cannot be considered other than an intentional system of cruel, unusual and degrading treatment and a form of torture”. Although the Pentagon has denied the allegations of torture and ill-treatment raised by the ICRC, they have had added further weight to earlier allegations made by released detainees.

In July 2004, for example, released Guantánamo detainee, Swedish national Mehdi Ghezali, described to Amnesty International the pain of “short shackling” in interrogations: “There was a ring attached to the floor. They chained your hands and feet to this ring. You had to sit chained with your arms between your legs from underneath. In this way, they could let you sit for hours”. He has described harsh interrogations, including the manipulation of air conditioning to make interrogation rooms very cold or very hot. He said that during interrogations rap and heavy metal music was played loud, or sometimes loud un-tuned radio noise, which was “very unpleasant”. Mehdi Ghezali told Amnesty International that he was subjected to sleep deprivation in April 2004, three months before he was released:

“They kept doing it for about two weeks around 11 April 2004. The Americans took me to an interrogation that lasted 14-16 hours. Then they brought me back to my cell. Shortly thereafter, just as I was going to bed, the guards came and said that I was going to be moved to another cell. One hour later I was moved once more to another cell. I once saw how the guards treated an Australian prisoner in this way, by moving him from cell to cell and thus preventing him from getting any sleep. At the end, there was blood coming from both his nose and his ears. He was so tired.”

In July 2004, Guantánamo detainee Moazzam Begg wrote in a letter copied to Amnesty International and others that he had been held in solitary confinement since 8 February 2003. He was reportedly only moved out of his isolation cell in Guantánamo’s Camp Echo in October 2004 after the case of a fellow Camp Echo detainee was brought up for judicial scrutiny before District Judge James Robertson in Washington, DC. Until then, Moazzam Begg had been held in a reportedly windowless cell under 24-hour video surveillance. His isolation began almost a year to the day after the White House gave assurances that, despite President Bush’s decision not to apply the Geneva Conventions to the Guantánamo detainees, they would “not be subjected to physical or mental abuse or cruel treatment”. Six hundred days in isolation, without charge, trial or judicial review, cannot be considered either humane or lawful under international norms.

“Amnesty International welcomes the yearly human rights reports of the US State Department – under the UDHR, the USA and other countries should promote human rights and denounce abuses. Such reports, however, are drained of moral power when the government making the criticism is itself sanctioning or turning a blind eye to human rights violations within its own jurisdiction.”

The US government has not rejected the interrogation techniques and detention conditions it has authorized that violate international law and standards. At the same time, it has continued to proclaim its unswerving commitment to basic human rights principles. It cannot have it both ways.

On 26 June 2003, President Bush proclaimed that the USA is “committed to the worldwide elimination of torture and we are leading this fight by example”. This proclamation came a matter of weeks after a Pentagon Working Group had produced its report on Detainee Interrogations in the Global War on Terrorism, classified “secret” by Secretary of Defense Donald Rumsfeld until 2013, contending that as Commander-in-Chief of the armed forces the President was not bound by US and international law prohibiting torture and suggesting legal defences against criminal liability for any officials accused of torture.

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On the eve of President Bush's proclamation against torture, the General Counsel of the Department of Defense wrote to a US Senator concerned about allegations of torture and cruel, inhuman or degrading treatment against "war on terror" detainees. The Pentagon letter said that "we can assure you that it is the policy of the United States to comply with all of its legal obligations in its treatment of detainees, and in particular with legal obligations prohibiting torture. Its obligations include conducting interrogations in a manner that is consistent with the Convention against Torture". These assurances came just six months after Secretary Rumsfeld approved, for use at Guantánamo, a number of interrogation techniques which violated the USA's obligations under the UN Convention against Torture, and variations of which emerged not long afterwards in Abu Ghraib prison in occupied Iraq. The techniques included stress positions, sensory deprivation, isolation, hooding, stripping and the use of dogs to inspire fear.

It is clear that the US administration's assurances and proclamations on its commitment to human rights must be treated with caution. It is clear that the administration will have to offer more than just words if it is to persuade the international community that it will apply the standards to its own conduct that it so often says it expects of others.

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In an address on 21 September 2004, President Bush told the UN General Assembly that "the United Nations and my country share the deepest commitments. Both the American Declaration of Independence and the Universal Declaration of Human Rights proclaim the equal value and dignity of every human life."

At the core of the Universal Declaration is the recognition of the "inherent dignity and of the equal and inalienable rights of all members of the human family [as] the foundation of freedom, justice and peace in the world". Over the past three years, "human dignity" has been one of the stock phrases of the US administration. The National Security Strategy mentions it no less than seven times in its 31 pages, and devotes an entire chapter to promising that the USA will "stand firmly for the non-negotiable demands of human dignity". In all three of his State of the Union addresses, as well as in his inaugural speech, President Bush asserted that the USA was founded upon and is dedicated to the cause of human dignity. It was a theme of his speech to the UN General Assembly on 21 September 2004. In a statement three months earlier to mark the UN International Day in Support of Victims of Torture, the President said that the "non-negotiable demands of human dignity must be protected without reference to race, gender, creed, or nationality. Freedom from torture is an inalienable human right, and we are committed to building a world where human rights are respected and protected by the rule of law."

In a central policy memorandum issued on 7 February 2002, President Bush suggested that there were detainees "who are not legally entitled to [humane] treatment". This position, which flies in the face of the unconditional legal prohibition on torture and other cruel, inhuman or degrading treatment, suggested that his administration views fundamental human rights as privileges that can be granted, and therefore taken away, by the state. The US administration's definition of "human dignity" and the "rule of law" would also appear to differ from more common understandings of such terms within the international community. On this question, just a glimpse at some of the principles of the UDHR is instructive:

- Article 3: "Everyone has the right to life..." Since 1977, consistent with the UDHR, more than 60 countries have abolished the death penalty, a punishment that is an affront to human dignity and a symptom of a culture of violence. Today, 118 countries are abolitionist in law or practice. In contrast, the USA has conducted more

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than 940 executions since resuming judicial killing in 1977, some 72 per cent of which have been carried out in the past decade. Federal executions resumed in 2001 after nearly four decades without them. The USA has regularly contravened international safeguards in its pursuit of judicial killing – executing child offenders, the mentally impaired, the inadequately represented, the possibly innocent and foreign nationals denied their consular rights. The cases of three prisoners who were scheduled for execution on 1, 2 and 3 December – Frances Newton in Texas (who received an executive 120-day reprieve a few hours before being killed), George Banks in Pennsylvania, and Charles Walker in North Carolina – provide further evidence of the arbitrariness and error that mark the US capital justice system.² Studies have also consistently shown that race plays a role in who is sentenced to death in the USA.

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- Article 5: *“No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”*. The US administration’s “torture memos” which have come into the public domain since the emergence of photographs of war crimes by US soldiers in Abu Ghraib prison in Iraq reveal that the administration has been far from committed to the prohibition on torture and cruel, inhuman or degrading treatment since launching the “war on terror”. The April 2003 report of the Pentagon’s Working Group on Detainee Interrogations in the Global War on Terrorism, which recommended interrogation techniques which the UN Committee against Torture has said violate the prohibition on torture or cruel, inhuman or degrading treatment, noted that the UDHR “is not itself binding or enforceable against the United States”. The US administration has still not denounced such techniques, and continues to hold people in conditions that either amount to cruel, inhuman or degrading treatment in themselves or facilitate such treatment. President Bush has said out that “the victims [of torture] often feel forgotten, but we will not forget them”. To Amnesty International’s knowledge, no one who has been subjected to torture or ill-treatment by US forces during the “war on terror” has received compensation or other reparations from the USA.
- Article 6: *“Everyone has the right to recognition everywhere as a person before the law”*. In the “war on terror”, the USA has resorted to secret detentions, in some case amounting to “disappearance”. Such people have been placed outside the protection of the law. The USA is alleged to have engaged in numerous “renditions”, transfers of prisoners between itself and other countries which bypass fundamental human rights safeguards.
- Article 7: *“All are equal before the law and are entitled without any discrimination to equal protection of the law”*. Under a Military Order signed by President Bush in November 2001, foreign nationals can be tried by military commission – executive bodies not independent or impartial courts – with the power to admit coerced evidence and hand down death sentences against which there would be no right of appeal to any court. The military commissions do not apply to US citizens. The Military Order violates international law by providing for the discriminatory application of fair trial rights on the basis of nationality.

² <http://web.amnesty.org/library/Index/ENGAMR511632004>,
<http://web.amnesty.org/library/Index/ENGAMR511642004>,
<http://web.amnesty.org/library/Index/ENGAMR511652004>.

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- Article 8: “*Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law*”. President Bush’s Military Order of 13 November 2001 stated that no one named under it would be “privileged to seek any remedy or maintain any proceeding, directly or indirectly, or to have any such remedy or proceeding sought on the individual’s behalf, in (i) any court of the United States, or any State thereof, (ii) any court of any foreign nation, or (iii) any international tribunal”. It has been a clear thrust of this administration’s detention policies to attempt to remove detainees from the reach of the judiciary. As far as Amnesty International is aware, no detainee released without charge or trial from Guantánamo Bay after months or years in custody have been compensated for arbitrary arrest or detention, as provided for under Article 9.5 of the International Covenant on Civil and Political Rights.
- Article 9: “*No one shall be subjected to arbitrary arrest, detention or exile.*” The USA continues to hold hundreds of foreign detainees without charge or trial in the US Naval Base in Guantánamo Bay in Cuba. The refusal of the US authorities to allow detainees access to legal counsel or the courts has violated international law and standards, and caused serious suffering to detainees and their families.
- Article 10: “*Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him*”. None of those captured in the course of the international armed conflict in Afghanistan was brought before a “competent tribunal” as required under the Third Geneva Convention. Despite the US Supreme Court’s ruling in June 2004 that the US courts have jurisdiction over the Guantánamo detainees, not one has yet been brought before a court. The administration instead continues to want to try selected detainees by military commission, and to justify continuing to hold the Guantánamo detainees on the basis of the outcomes of Combatant Status Review Tribunals, administrative proceedings for which the detainee has no access to legal counsel or to secret evidence against him.
- Article 18: “*Everyone has the right to freedom of thought, conscience and religion*”. The USA’s National Security Strategy asserts that “the United States must defend liberty and justice because these principles are right and true for all people everywhere.” On 3 June 2004, US Army Sergeant Abdullah Webster was sentenced to 14 months in prison for refusing to participate in the war on Iraq on the basis of his religious beliefs. Two weeks earlier, Staff Sergeant Camilo Mejía Castillo had been sentenced to one year’s imprisonment for desertion after refusing to return to his unit, citing moral reasons, the legality of the war, and the conduct of US troops towards Iraqi civilians and prisoners. Amnesty International believes both men are prisoners of conscience, and should be immediately and unconditionally released.³ Liberty and justice.

In the absence of the necessary human rights leadership at the highest levels of the US government, it is up to others to encourage the USA to live up to the standards it so often says it expects of others. As the UN General Assembly proclaimed on 10 December 1948, “every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance”. Amnesty International urges President Bush to make respect for human rights and international law a hallmark of his second term in office.

³<http://web.amnesty.org/library/Index/ENGAMR510922004>,
<http://web.amnesty.org/library/Index/ENGAMR511182004>, and
<http://web.amnesty.org/library/Index/ENGAMR511372004>

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TAKE ACTION FOR HUMAN RIGHTS

Please write to President Bush, in your own words, calling on him to put respect for human rights and international law at the heart of government, and to:

- Support a full commission on inquiry into all the USA's "war on terror" detention and interrogation policies and practices. Such a commission should be independent of government and have the powers to investigate all agencies and levels of government;
- Bring an end to the USA's use of secret and incommunicado detentions in the "war on terror", clarify the identity, fate and whereabouts of all detainees in US custody, and work to end torture and cruel, inhuman and degrading treatment in compliance with international law and standards;
- Work to ensure that all US agents implicated in war crimes, "disappearances", secret detentions, torture or other cruel, inhuman or degrading treatment are brought to justice;
- Revoke the Military Order of 13 November 2001 and to drop all efforts to bring anyone to trial by military commission, including by dropping all appeals against District Judge James Robertson's 8 November 2004 order in *Hamdan v Rumsfeld*;
- Ensure that all detainees in Guantánamo are brought to trial in accordance with international standards, without resort to the death penalty, or else are released;
- Do all in his power and influence to obtain the immediate and unconditional release of Sergeant Abdullah Webster and Staff Sergeant Camilo Mejía Castillo;
- Impose a moratorium on federal executions, and promote abolition of the death penalty nationwide;
- Work to have the USA withdraw its reservations and other limiting conditions attached to its ratification of human rights treaties, including the International Covenant on Civil and Political Rights and the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
- Work to have the USA ratify the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women, the American Convention on Human Rights, the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, the Rome Statute of the International Criminal Court, and Additional Protocols I and II to the Geneva Conventions.

President George W. Bush, The White House, 1600 Pennsylvania Avenue NW
Washington, DC 20500, USA.

Fax: +1 202 456 2461. Email: president@whitehouse.gov. Salutation: Dear Mr President

If possible, please copy your appeals to President Bush's nominees for (1) Secretary of State and (2) Attorney General:

(1) Condoleezza Rice
National Security Adviser
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500, USA.

(2) Alberto Gonzales
White House Counsel
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500, USA

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