MC-54-19 ASSANGE-CROSBY AFFIDAVIT OF SONDRA S. CROSBY

- 1. I am a licensed physician in the Commonwealth of Massachusetts and am board certified in the specialty of Internal Medicine. I graduated from the University of Washington School of Medicine, and received my clinical training at the Boston City Hospital (now Boston Medical Center) residency program in Internal Medicine. Currently, I am an Associate Professor of Medicine and Public Health, at the Boston University Schools of Medicine and Public Health, in the Departments of Medicine, and Center for Health Law, Ethics, and Human Rights, and a member of the Section of General Internal Medicine at Boston Medical Center.
- 2. My clinical practice focuses on care of asylum seekers and refugees, most of whom have experienced torture. I have taught extensively on the medical care and evaluation of refugees and survivors of torture, and I have given invited presentations throughout the United States and internationally on various topics related to caring for survivors of torture. I have taught and mentored Istanbul Protocol evaluation and documentation in Bishkek, Kyrgyzstan; Dushanbe, Tajikistan; Istanbul, Turkey; Reyhanli, Turkey; Almaty, Kazakhstan; Erbil, Iraq, and Amman, Jordan as a medical consultant for Physicians for Human Rights. I have given workshops on the preparation of medical affidavits and have lectured in the Asylum Officers Basic Training Course in Lansdowne, VA and in the Boston Asylum office, on medical forensic findings in asylum cases.

- 3. I have recently been invited to participate in the Istanbul Protocol Supplement (IPS)

 Project, as part of an international committee to update and write a supplement for the

 Istanbul Protocol. The Istanbul Protocol is the international standard for the investigation
 of torture.
- 4. In addition, I have published scholarly papers in *The New England Journal of Medicine*,

 The Journal of the American Medical Association (JAMA), Annals of Internal Medicine,

 The British Medical Journal, The Journal of General Internal Medicine, The

 Laryngoscope, The British Journal of Ophthalmology, and Urology among others, on my

 work in caring for survivors of torture.
- 5. I have been qualified as an expert witness in United States Immigration Court in Boston, Federal District Court for the District of Columbia, and the Military Commission Court in Guantánamo Bay, Cuba (United States v. Al-Nashiri). I have written over 500 affidavits documenting medical and psychological sequelae of torture.
- 6. I have evaluated and examined nearly 1000 survivors of torture in my medical practice. I am consultant to Physicians for Human Rights, and have evaluated the effects of torture, cruel, inhuman, and degrading treatment and displacement on Darfuri women living in a Refugee Camp in Chad, and former detainees in US detention at Guantánamo Bay, and at other sites in Iraq and Afghanistan. Furthermore, I have served as a medical forensic expert for the Bahrain Independent Commission of Inquiry, investigating allegations of torture.
- 7. I am co-founder and director of the Forensic Medical Evaluation Group, a multidisciplinary group at Boston University School of Medicine and Boston Medical Center, providing evaluation and documentation of physical and psychological evidence of torture and abuse.

- 8. I met Mr. Julian Assange for a medical evaluation at the Ecuadorian embassy on February 23, 2019, at approximately 1300. This was a Saturday, and the only people in the embassy were Mr. Assange and a security guard. Our visit took place in a conference room within the embassy.
- 9. Mr. Assange explained the intensified surveillance in the embassy: We spoke over the noise of a radio playing to decrease the amount information intercepted by listening devices in the room, and the entire medical visit was monitored by two cameras. The hostile, nonconfidential, and intimidating environment was palpable.
- 10. At approximately 1600, I stepped out of the room, and left the embassy temporarily to obtain some food, as Mr. Assange had not eaten. Upon returning to the embassy, I returned to our meeting room and discovered that my confidential medical notes had been removed. The notes were located in a space utilized by embassy surveillance staff (and had presumably been read). Mr. Assange's right to doctor-patient confidentiality was violated, and his confidential information had been breached.
- 11. In addition, upon my return to the embassy after obtaining food for Mr. Assange, I was questioned by the security staff, and was forced to write a statement as to who I was and the purpose of my visit (which had already been established). I was asked for a copy of my medical license, which was taken and photocopied (my passport and phone had been taken earlier). The embassy security guard then told me he had to "make a call" before I would be allowed back in the embassy to complete my evaluation. I was not informed who he was calling or why. The experience was intimidating.

Signed under the pains and penalties of perjury under the laws of the Commonwealth of Massachusetts and the United States of America.

Dated: March 1, 2019

Dr. Sondra S. Crosby
Associate Professor of Medicine
Boston University School of Medicine
Associate Professor of Health Law, Ethics, and Human Rights
Boston University School of Public Health

Sondia Gosby M.D.