## JUSTICE COURT, LAS VEGAS TOWNSHIP CLARK COUNTY, NEVADA

THE STATE OF NEVADA,	,
Plaintiff,	)
-VS-	)
BRADFORD J. LYTTLE #2706672	CASE NO: 09M15073A-N  DEPT NO: 5  disclosure of lists of witnesses relating to expert testimony, pursuant to Nevada Revised Statutes Sect. 174.234
MARIAH DAY KLUSMIRE #2706673	
KATHLEEN F. KELLY #2706675	
STEPHAN MICHAEL KELLY #2706674	
JUDITH ANN HOMANICH #2706677	
RENEE LYNN ESPELAND #2706676	
JEROME A. ZAWADA #2706678	
MEGAN GILLESPIE RICE #2706680	
BRIAN DAVID TERRELL #2706682	
ELIZABETH LANEY PAPPALARDO	
#2706681	)
DENNIS DUVALL #2706684	)
JOHN STEPHEN DEAR #2706683	)
EVE LEONA TETAZ #2706685	)
LUIS JOHN VITALE, aka,	)
Louis Anselmo Vitale, #0200109	)
	)

Bill Quigley is the Legal Director for the Center for Constitutional Rights, a national legal and educational organization dedicated to advancing and defending the rights guaranteed by the United States Constitution and the Universal Declaration of Human Rights. Bill joined CCR on sabbatical from his position as law professor and Director of the Law Clinic and the Gillis Long Poverty Law Center at Loyola University New Orleans. He has been an active public interest lawyer since 1977. He has served as counsel with a wide range of public interest organizations on issues including Katrina social justice issues, public housing, voting rights, death penalty, living wage, civil liberties, educational reform, constitutional rights and civil disobedience. Bill has litigated numerous cases with the NAACP Legal Defense and Educational Fund, Inc., the Advancement Project, and with the ACLU of Louisiana, for which he served as General Counsel for over 15 years. Bill received the 2006 Camille Gravel Civil Pro Bono Award from the Federal Bar Association New Orleans Chapter. Bill received the 2006 Stanford Law School National Public Service Award and the 2006 National Lawyers Guild Ernie Goodman award. He has also been an active volunteer lawyer with School of the Americas Watch and the Institute for Justice and Democracy in Haiti. Bill is the author of Ending Poverty As We Know It: Guaranteeing A Right to A Job At A Living Wage (2003) and Storms Still Raging: Katrina, New Orleans and Social Justice (2008). In 2003, he was named the Pope Paul VI National Teacher of Peace by Pax Christi USA and is the recipient of the 2004 SALT Teaching Award presented by the Society of American Law Teachers.

At a misdemeanor trespass trial in Washington D.C., on June 14<sup>th</sup>, 2010, Bill Quigley presented to Judge Canon the reasons why defendants were exercising their first amendment right to assemble peaceably for redress of grievance. He has presented similar testimony as a defense lawyer in numerous trials. He is also qualified to testify about responsibilities of U.S. citizens to act in accord with international law.

Bill will demonstrate to the court that U.S. citizens must familiarize themselves with the requirements of international law which state that "it is incumbent on pilots, whether remote or not, to ensure that a commander's assessment of the legality of a proposed strike is borne out by visual confirmation that the target is in fact lawful, and that the requirements of necessity, proportionality and discrimination are met." --Human rights Council, Fourteenth session, Agenda item 3, Report of Philip Alston, the Special Rapporteur on extrajudicial, summary or arbitrary executions. These pilots are among those based and/or commanded at Creech Air Force Base, where the charges pending against us allegedly took place.

Address: Bill Quigley, 298 Mulberry Street, Apt. 7, NY, NY 10012

Colonel Ann Wright, US Army (Ret.), U.S. Diplomat

"I have served my country for almost thirty years in some of the most isolated and dangerous parts of the world. I want to continue to serve America. However, I do not believe in the policies of this Administration and cannot --- morally and professionally --- defend or implement them. It is with heavy heart that I must end my service to America and therefore resign."

Ann Wright has been a career military woman, a State Department diplomat, and for the past few years an influential spokesperson in the anti-war movement. Ann Wright grew up in Bentonville, Arkansas, and attended the University of Arkansas, where she holds a Master's and a Law Degree. She also has a Master's Degree in National Security Affairs from the US Naval War College.

She spent 13 years in active duty with the U.S. Army, with another 16 years in the Army reserves, retiring as a Colonel. Part of her work was in special operations, particularly in civil and humanitarian operations, in the event of troop invasions into countries like Iraq. Ann helped to develop, as she explained, "plans about how you interact with the civilian population, how you protect the facilities – sewage, water, electrical grids, libraries...It's our obligation under the law of land warfare." Colonel Wright requested a release from active duty from the Army and joined the State Department. For the next 16 years, she served as a foreign diplomat in countries such as Nicaragua, Somalia, Uzbekistan, and Sierra Leone. She was on the team that reopened the US Embassy in Kabul, Afghanistan in December, 2001, after the fall of the Taliban to US forces.

In all those years, Ann Wright was proud of her representation of America. However, on

March 13, 2003, the eve of the US invasion of Iraq, Ms. Wright sent a letter of resignation to then Secretary of State Colin Powell. In an interview, she explained that, in the Foreign Service, "Your job is to implement the policies of an administration...if you strongly disagree with any administration's policies, and wish to speak out, your only option is to resign. I understood that and that's one of the reasons I resigned – to give myself the freedom to speak out."

Col. Ann Wright will clarify that it is the responsibility of U.S. officials, under the law of land warfare, to protect facilities needed by civilian populations. Drawing from expertise required in her capacity as a U.S. diplomat responsible for reopening the U.S. Embassy in Kabul, Afghanistan in December, 2001, she will show the vulnerability of the civilian population to aerial attacks. Such attacks are facilitated or enacted by drone surveillance and combat aircraft based and/or commanded at Creech Air Force Base.

Ann Wright 2333 Kapiolani Blvd #3217, Honolulu, HI 96826

**Ramsey Clark** served in the U.S. Marine Corps in 1945 and 1946, then earned a Bachelor's Degree from the <u>University of Texas</u> at Austin in 1949, and thereafter a Master's Degree as well as a J.D. from the University of Chicago.

During the presidential administrations of John F. Kennedy and then Lyndon Johnson, Clark served as Assistant Attorney General of the Lands Division from 1961-65; Deputy Attorney General from 1965-67; and finally U.S. Attorney General from 1967-69. Throughout his tenure as Attorney General, Clark focused on social issues and civil rights. He set up the first federal narcotics addict-treatment unit. He restructured federal prisons to stress the importance of rehabilitation, early release, education, and job training rather than punishment. And he was the first Attorney General to call for the elimination of the death penalty.

After his years in the Justice Department, Clark worked as a law professor and became a prominent figure in the anti-Vietnam War movement. In 1974 he was the <u>Democratic Party</u>'s candidate for a U.S. Senate seat representing New York, but lost to Republican Jacob Javits. In 1976 Clark again sought the Democratic nomination for U.S. Senate but was defeated by Daniel Patrick Moynihan.

For decades, Clark has studied and critiqued American foreign policy and its related military campaigns, from the Vietnam War, to the Iraq War, to the broader War on Terror. His clients have included Slobodan Milosevic and Saddam Hussein.

Ramsey Clark will testify about the duties of U.S. citizens under international law and U.S. constitutional law, and how our alleged actions at Creech Air Force Base are consistent with these duties. As a former U.S. Attorney General, he was responsible to enforce U.S. law including citizen obligations under international treaties, such as the

Geneva Conventions, to which the U.S. has been a signatory and which therefore become the law of the land.

Under international humanitarian law, one question that needs to be resolved is whether those targeted are combatants. The Geneva Conventions on the Law of War, particularly common Article 3, prohibit the intentional killing of civilians. Common Article 3 prohibits:

"(a) violence to life and person, in particular murder of all kinds, mutilation, cruel treatment and torture;" and "(d) the passing of sentences and the carrying out of executions without previous judgment pronounced by a regularly constituted court, affording all the judicial guarantees which are recognized as indispensable by civilized peoples."

Other international human rights instruments, such as the International Covenant on Civil and Political Rights, state that arbitrary execution is unlawful. Ramsey Clark will demonstrate that usage of Unmanned Aerial Vehicles based at Creech Air Force Base to kill "high value targets" constitutes extrajudicial executions and fails to afford all the judicial guarantees that are recognized as indispensable by civilized peoples.

Ramsey Clark, 37 West 12th Street New York, NY 10011

## CERTIFICATE OF SERVICE

I certify that I, Kathleen F. Kelly, served a copy of this document to: Clark County Office of the District Attorney
Clark County Assistant District Attorney Rob Stephens
200 Lewis Avenue 9th floor
Las Vegas, NV 89101
via:

\_\_\_ US Postal Service overnight mail August 20, 2010