

**HEARTLAND  
ALLIANCE**  
MARJORIE KOVLER CENTER

Marjorie Kovler Center  
1331 West Albion Avenue  
Chicago, IL 60626

P 773.381.4070  
F 773.381.4073  
Kovlercenter.org

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.

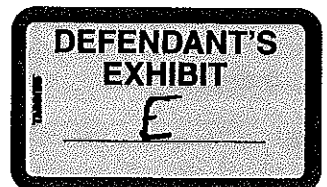
**Background Information:**

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.

DEFENDANT'S  
EXHIBIT

E

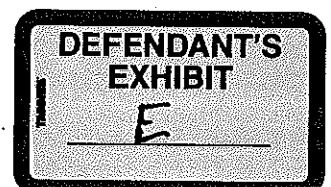
10. Ms. Odeh described the new area as "very, very cold" and that the toilet and seating was made of metal and was also cold and uncomfortable. She described at her age, it is difficult to tolerate such cold. She stated she was allowed to purchase an extra t-shirt and blanket, but it was not enough to 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?"



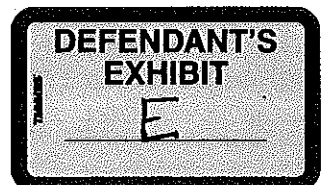
29. Ms. Odeh reported that she has scheduled appointments to see her physician and dentist for follow up regarding her health. She stated she has difficulty falling asleep at night; she cannot relax. She tries praying to help and it does sometimes. She also reported that she has returned to work and 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

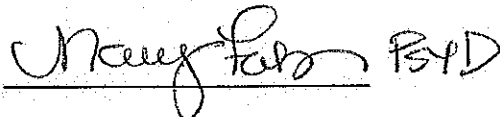




**Summary:**

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

Mary Fabri, PsyD  
IL License #071-003776

