



employees and co-conspirators Steven Stefanowicz (“Big Steve”), Daniel Johnson (“DJ”) and Timothy Dugan directed and caused some of the most egregious torture and abuse at Abu Ghraib.

### **JURISDICTION AND VENUE**

2. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1332 (diversity jurisdiction); 28 U.S.C. § 1350 (Alien Tort Statute); and 28 U.S.C. § 1367 (supplemental jurisdiction).

3. Venue is proper pursuant to U.S.C. § 1391(a)(3) and § 1391(b)(2).

### **PARTIES**

4. Plaintiff Suhail Najim Abdullah Al Shimari resides in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by Defendants CACI International Inc. and its wholly-owned subsidiary CACI Premier Technology (hereinafter collectively “CACI”) and their co-conspirators. He suffered and continues to suffer from physical and mental injuries caused by the torture.

5. Plaintiff Taha Yaseen Arraq Rashid resides in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by CACI and its co-conspirators. He suffered and continues to suffer from physical and mental injuries caused by the torture.

6. Plaintiff Asa’ad Hamza Hanfoosh Al-Zuba’e resides in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by CACI and its co-conspirators. He suffered and continues to suffer from physical and mental injuries caused by the torture.

7. Plaintiff Salah Hasan Nsaif Jasim Al-Ejaili resides in Qatar. He is an innocent Iraqi who was badly tortured by CACI and its co-conspirators. He suffered and continues to suffer from physical and mental injuries caused by the torture.

8. Defendant CACI International Inc. is a publicly-traded Delaware corporation with headquarters located at 1100 North Glebe Road, Arlington, Virginia 22201.

9. Defendant CACI Premier Technology, Inc. is a wholly-owned subsidiary and alter ego of CACI International Inc., and is also located at 1100 North Glebe Road, Arlington, Virginia 22201.

10. CACI received hundreds of millions of dollars from the United States in exchange for providing the United States Army with services, including interrogation services.

### **THE TORTURE OF SUHAIL NAJIM ABDULLAH AL SHIMARI**

11. Mr. Al Shimari was imprisoned at the Abu Ghraib hard site for approximately two months after being arrested on or about November 7, 2003.

12. Mr. Al Shimari was subjected to electric shocks.

13. Mr. Al Shimari was struck with a baton-like instrument.

14. Mr. Al Shimari was beaten.

15. Mr. Al Shimari was deprived of food.

16. Mr. Al Shimari was deprived of sleep for extended periods of time.

17. Mr. Al Shimari was threatened with dogs.

18. Mr. Al Shimari was subjected to sensory deprivation and to extreme temperatures.

19. Mr. Al Shimari was stripped naked and kept naked in his cell.

20. Mr. Al Shimari was threatened with death.

21. Mr. Al Shimari was kept naked and forced to engage in physical activities to the point of exhaustion.

22. Mr. Al Shimari was forcibly shaved.

23. Mr. Al Shimari was kept in a cage.

24. Mr. Al Shimari was forced to watch as CACI and its co-conspirators choked another detainee.

25. Mr. Al Shimari was released on or about March 27, 2008, without ever being charged with any crime.

#### **THE TORTURE OF TAHA YASEEN ARRAQ RASHID**

26. Mr. Rashid was imprisoned at the Abu Ghraib hard site for approximately three months after being arrested on or about September 22, 2003.

27. Mr. Rashid was stripped and kept naked.

28. Mr. Rashid was deprived of oxygen.

29. Mr. Rashid was subjected to sensory deprivation.

30. Mr. Rashid was placed in stress positions for extended periods of time.

31. Mr. Rashid was deprived of food and water.

32. Mr. Rashid was forcibly subjected to sexual acts by a female as he was cuffed and shackled to cell bars.

33. Mr. Rashid was beaten with wooden sticks.

34. Mr. Rashid was repeatedly shot in the head with a taser gun.

35. Mr. Rashid was subjected to electric shocks.

36. Mr. Rashid suffered from a broken arm, broken leg, inability to walk and loss of vision as a result of the beatings.

37. Mr. Rashid was dragged by a rope where part of it was tied tightly to his penis.

38. Mr. Rashid was hung from the ceiling by a rope tied around his chest.

39. Mr. Rashid was subjected to mock execution.

40. Mr. Rashid was subjected to having woman's underwear placed over his head while handcuffed.

41. Mr. Rashid was subjected to being detained naked in the same cell as a female detainee.

42. Mr. Rashid was forced to watch as the conspirators raped a female detainee.

43. Mr. Rashid was removed from his cell by stretcher and hidden from the International Committee of the Red Cross ("ICRC"), who visited Abu Ghraib shortly after Mr. Rashid had been brutally and repeatedly beaten.

44. Mr. Rashid was released on or about May 6, 2005 without ever being charged with any crime.

#### **THE TORTURE OF ASA'AD HAMZA HANFOOSH AL ZUBA'E**

45. Mr. Al-Zuba'e was imprisoned at the Abu Ghraib hard site for approximately one year after being arrested on or about November 1, 2003.

46. Mr. Al-Zuba'e was repeatedly beaten.

47. Mr. Al-Zuba'e was stripped and kept naked.

48. Mr. Al-Zuba'e was subjected to extremes of temperature and to having cold water poured over his naked body.

49. Mr. Al-Zuba'e was hooded and chained to the bars of his cell.

50. Mr. Al-Zuba'e was threatened with unleashed dogs.

51. Mr. Al-Zuba'e was beaten on his genitals with a stick.

52. Mr. Al-Zuba'e was imprisoned in a solitary cell in conditions of sensory deprivation for almost a full year.

53. Mr. Al-Zuba'e was released from Abu Ghraib on or about October 24, 2004, without ever being charged with a crime.

#### **THE TORTURE OF SALAH HASAN NSAIIF JASIM AL-EJAILI**

54. Mr. Al-Ejaili was imprisoned in the Abu Ghraib hard site after being arrested on or about November 3, 2003.

55. Mr. Al-Ejaili was subjected to repeated beatings.

56. Mr. Al-Ejaili was stripped and kept naked.

57. Mr. Al-Ejaili was imprisoned in a solitary cell in conditions of sensory deprivation.

58. Mr. Al-Ejaili was subjected to extremes of temperature, with both hot and cold water thrown on his naked body.

59. Mr. Al-Ejaili was placed in stress positions for extended periods of time.

60. Mr. Al-Ejaili was threatened with unleashed dogs.

61. Mr. Al-Ejaili was deprived of food.

62. Mr. Al-Ejaili was deprived of sleep.

63. Mr. Al-Ejaili was released from Abu Ghraib on or about February 1, 2004, without ever being charged with a crime.

#### **THE TORTURE CONSPIRACY**

64. All of these harms were inflicted on Plaintiffs by groups of persons conspiring together to torture detainees kept at the Abu Ghraib hard site. Among the conspirators were CACI employees Steven Stefanowicz, Daniel Johnson, and Timothy Dugan. Reasonable discovery likely will establish that other CACI employees also participated in the ongoing conspiracy to torture Plaintiffs and other detainees. CACI employees instigated, directed,

participated in, aided and abetted conduct towards detainees that clearly violated the Geneva Conventions, the Army Field Manual, and the laws of the United States.

65. These and other CACI employees conspired with military personnel to harm Plaintiffs in the various manners and methods referred to above. Major General George R. Fay's AR15-6 Investigation of the Abu Ghraib Detention Facility and 205th Military Intelligence Brigade ("Fay Investigation") found that CACI employees, along with military intelligence personnel, military police, and medical soldiers, had "responsibility or complicity in the abuses that occurred at Abu Ghraib."

66. The Fay Investigation concluded, "What started as nakedness and humiliation, stress and physical training (exercise), carried over into sexual and physical assaults by a small group of morally corrupt and unsupervised Soldiers and civilians." The civilians identified by the Fay Investigation included CACI employees.

67. Major General Antonio Taguba's Article 15-6 Investigation of the 800th Military Police Brigade ("Taguba Investigation") concerning the abuse at Abu Ghraib identified CACI employee Big Steve Stefanowicz alongside military personnel and the employee of another contractor working at Abu Ghraib, as directly or indirectly responsible for the abuses at Abu Ghraib.

68. CACI employees had unsupervised access to the detainee areas of Abu Ghraib, causing confusion among military police personnel, particularly those convicted of abuse at the prison, as to whether CACI employees were military intelligence personnel or civilian contractors. CACI employees gave orders to and supervised military personnel (and military personnel followed their orders) in direct violation of CACI's Statement of Work as well as the controlling military regulations.

69. Sworn and unsworn testimony from military co-conspirators describe CACI employees Steven Stefanowicz and Daniel Johnson as among those interrogators who most frequently directed that detainees be tortured.

70. CACI employees used the term “special treatment” and related code words to signal to their military co-conspirators to employ torture and other abusive techniques of the kind Plaintiffs suffered at the hard site.

71. For example, CACI employee and co-conspirator Daniel Johnson interrogated an Iraqi policeman held at Abu Ghraib with the assistance of Staff Sergeant Ivan L. Frederick II. Johnson directed Sergeant Frederick to give the policeman the special treatment. During the interrogation, Johnson instructed Sergeant Frederick to inflict severe pain upon the Iraqi detainee in order to induce him to answer Johnson’s questions.

72. CACI co-conspirators also permitted and/or instructed military police to “set the conditions” for interrogations. The CACI co-conspirators knew that “setting conditions” for interrogations equated to serious physical abuse in an attempt to make detainees more responsive to CACI interrogators.

73. For instance, co-conspirator Big Steve Stefanowicz would direct military police to intimidate detainees with military working dogs to soften the detainees for future interrogations.

74. Private Charles Graner, who was sentenced by court martial to ten years imprisonment for his participation in torture in Abu Ghraib, gave sworn testimony to the U.S. Army Criminal Investigation Division that he tortured detainees on the instructions of CACI interrogators Stefanowicz and Johnson.

75. Private Ivan Frederick, who was sentenced by court martial to eight years imprisonment for his participation in torture in Abu Ghraib, testified that he tortured and abused

detainees as a result of instructions given to him by CACI co-conspirators Stefanowicz and Johnson.

76. The Taguba Investigation recommended official reprimand and termination of Stefanowicz for his role in the conspiracy, including for giving instructions to military personnel that Stefanowicz knew were physically abusive and prohibited. The Taguba Investigation also revealed that Big Steve made a false statement to the investigation team regarding location and conduct of interrogations, as well as abuses that occurred, which was done in order to cover up his role in the conspiracy to abuse detainees at Abu Ghraib.

77. The Fay Investigation likewise concluded that Stefanowicz lied to government investigators, that CACI employees Dugan and Johnson abused detainees, and that Johnson had encouraged and directed Private Frederick to abuse detainees.

78. The conspiracy intentionally failed to record persons as detained at Abu Ghraib in order to try to prevent the Red Cross from visiting with them and learning of the torture.

79. The conspiracy also intentionally hid detainees, including Plaintiff Rashid, from the Red Cross to prevent the Red Cross from learning of their abuse.

80. The acts of CACI employees constitute acts of CACI. CACI conveyed its intent to join the conspiracy, and directly and indirectly ratified its employees' participation in the conspiracy, by making a series of verbal statements and by engaging in a series of criminal acts of torture alongside and in conjunction with several co-conspirators. CACI attempted to cover up misconduct of its employees, and thereby perpetuate and prolong the conspiracy, by destroying or concealing evidence implicating CACI, and misleading U.S. government and international officials regarding CACI's role in detainee abuse. In addition, CACI acquiesced in its employees' misconduct, turning a blind eye to reports of employee abuse and failing to

adequately train and supervise employees to prevent reasonably foreseeable abuses of detainees at Abu Ghraib.

81. When a military officer, Staff Sergeant Neal, attempted to report to CACI management that CACI employee and co-conspirator Timothy Dugan was bragging that he had frightened a detainee badly enough to make him vomit, CACI ignored Sergeant Neal and did not conduct an inquiry into this misconduct or otherwise discipline this employee.

82. CACI employees alerted the CACI Managers about the prevalence of abuse of detainees at Abu Ghraib. Despite knowledge of the seriousness of the situation at Abu Ghraib, CACI Management failed to report this abuse to the military or to take additional steps to ensure its own employees discontinued detainee abuse.

83. CACI failed to follow the recommendation of Major General Taguba to reprimand “Big Steve” Stefanowicz for his role in detainee abuse. Instead, it launched an “internal investigation” into CACI employees’ involvement in detainee abuse which absolved Stefanowicz from all wrongdoing.

84. CACI failed to promptly discipline or terminate co-conspirator Johnson despite being informed that Johnson appeared in photographs depicting torture and abuse of detainees.

85. CACI interrogators’ encouragement, facilitation, direction, and conspiracy to engage in torture and abuse the detainees at Abu Ghraib was undertaken with the hope of creating “conditions” in which they could extract more information from detainees to please their U.S. government client.

86. Despite having knowledge of abuses, and the authority and duty to prevent them, CACI willfully ignored reports of CACI employees’ participation in the conspiracy, failed to discipline those conspirators who engaged in detainee abuse, and otherwise kept quiet about

CACI's role in the conspiracy in order to continue to earn millions of dollars from its contract with the United States government.

**CACI COULD HAVE PREVENTED AND STOPPED  
THEIR EMPLOYEES FROM TORTURING PLAINTIFFS**

87. CACI Premier Technology is an alter ego of CACI International Inc., not a separate fully capitalized business governed and controlled by independent executives with full autonomy.

88. CACI International Inc. wholly owns and controls CACI Premier Technology, and operates CACI Premier Technology as one of its corporate divisions. CACI International Inc. executives controlled how and whether CACI Premier Technology did business in Iraq.

89. CACI admitted in litigation in the District of Columbia that it had the ability to control, direct and influence the actions performed by employees.

90. CACI had the ability to prevent employees from torturing Plaintiffs.

91. CACI at all times were obliged by the terms of its contract and by applicable military regulations to directly train, supervise and discipline their employees. CACI directed its employees to report all problems they confronted to CACI Management, rather than to the U.S. military.

92. CACI placed a Site Lead Manager at Abu Ghraib prison, who himself reported to higher-level CACI Management. The Site Lead Manager had full access to information about the conduct and performance of CACI interrogators, including CACI co-conspirators.

93. CACI was put on notice of detainee abuse occurring at Abu Ghraib by CACI employees and U.S. military personnel alike.

94. CACI at all times retained the ability to stop employees from torturing and abusing Plaintiffs, but did not do so.

95. CACI is responsible for the actions taken by their employees towards pPaintiffs.

**CACI AND ITS CO-CONSPIRATORS TOOK STEPS TO  
COVER UP THE SCOPE AND EXTENT OF TORTURE**

96. Reasonable discovery will establish that, in addition to participating in the actual physical and mental abuse of Plaintiffs, CACI participated in other conspiratorial misconduct, including, but not limited to:

- (a) destroying documents, videos, and photographs,
- (b) preventing the reporting of the torture and abuse to non-conspiring authorities, the ICRC, and the media,
- (c) hiding Plaintiff Rashid and other detainees from the ICRC, and
- (d) misleading non-conspiring military and government officials about the state of affairs at the prisons.

97. CACI continued the conspiratorial campaign to prevent the truth about the torture, and CACI's participation in it, from ever being known to the public.

98. CACI embarked upon a campaign of intimidation to suppress any coverage or investigation of their role in the conspiracy. CACI repeatedly had its lawyers send letters threatening legal action to reporters who were considering reporting on CACI's role in the torture and mistreatment of detainees.

99. As part of this campaign of intimidation, CACI brought a frivolous lawsuit against a radio station. CACI lost the lawsuit.

100. Reasonable discovery will establish that CACI did not anticipate being able to prevail in the lawsuit, but rather brought it in order to intimidate media members who otherwise would have reported more fully on CACI's role in the torture.

101. CACI repeatedly made knowingly false statements to the effect that none of its employees was involved in torturing detainees. In fact, co-conspirators have admitted, some of whom admitted under oath, that CACI corporate employees were involved in the torture.

102. CACI's former Chief Executive Officer wrote a book called *Our Good Name*, claiming that CACI has conducted a thorough investigation, and found none of its employees at fault. Based on the description of the investigation found in this book, CACI's investigation does not include highly relevant interviews with Iraqi victims of torture and abuse, nor does such investigation include interviews with CACI employee Torin Nelson, who blew the whistle on the misconduct of his colleagues.

103. The investigation apparently also fails to account for the findings of the Taguba Investigation which concluded that CACI employee Stefanowicz was responsible for the abuses at Abu Ghraib and should suffer serious reprimand by CACI. The investigation similarly fails to account for testimony of U.S. military personnel in court martial proceedings that implicate Stefanowicz, along with other CACI employees, in instances of detainee torture and abuse.

104. The book falsely claims that the publicly-released photographs of torture at Abu Ghraib do not show any CACI employees. In fact, there is a photograph of Daniel Johnson interrogating a detainee in a dangerous and harmful stress position not authorized by the relevant military regulations governing interrogation nor by any military personnel.

105. Reasonable discovery will establish that CACI consulted with one or more of its co-conspirators during the preparation of this book.

**CACI KNEW THAT THEIR TORTURE OF DETAINEES  
VIOLATED THE LAWS OF THE UNITED STATES**

106. CACI intentionally and knowingly agreed to and did work in concert with the co-conspirators. To the extent that any particular act was perpetrated by a co-conspirator, CACI confirmed, sanctioned, ratified or otherwise acquiesced in the same.

107. CACI knew that the conspiracy to torture would harm Plaintiffs.

108. CACI earned millions of dollars in revenues as a result of participating in the ongoing conspiracy and in covering up its knowledge of the conspiracy.

109. CACI invested the financial fruits of the conspiracy in its ongoing operations.

110. CACI knew that military officials were prohibited from torturing detainees by the Army Field Manual, the Geneva Conventions the United States Code of Military Justice and other controlling law, and that any military officials who were doing so were violating the law.

111. CACI knew that the United States government has denounced the use of torture and other cruel, inhuman, or degrading treatment at all times. CACI knew that it was illegal for them to participate in, instigate, direct, or aid and abet the torture of Plaintiffs and other detainees.

112. For example, in its Initial Report to the United Nations Committee Against Torture, the United States Department of State noted that, “[t]orture is prohibited by law throughout the United States. It is categorically denounced as a matter of policy and as a tool of state authority.... No official of the government, federal, state or local, civilian or military is authorized to commit or to instruct anyone else to commit torture. Nor may any official condone or tolerate torture in any form.” *U.S. Department of State: Initial Report of the United States of America to the U.N. Committee Against Torture, Introduction* (1999). The State Department’s Report on Human Rights Practices characterized the following as prohibited forms of torture:

mock executions, sensory deprivation, repeated slapping, exposure to cold, stripping and blindfolding, food and sleep deprivation, threats to detainees or family members, dripping water on the head, squeezing of the testicles, rape, and sexual humiliation.

113. CACI knew that the ban on torture is absolute and no exigent circumstances permit the use of torture.

114. CACI knew that the United States intended and required that any person acting under the contract to the United States would conduct themselves in accordance with the relevant domestic and international laws, including laws prohibiting the use of torture and cruel, inhuman and degrading treatment.

115. CACI knew and understood that the United States does not condone torture of detainees.

116. CACI cannot credibly claim that the wrongful and criminal conduct of certain military and government personnel misled them into thinking that the torture of detainees was lawful and permissible.

**CACI CONDONED, ACQUIESCED IN AND ACTED NEGLIGENTLY  
IN FAILING TO PREVENT AND STOP TORTURE AND ABUSE OF DETAINEES**

117. CACI acted negligently and wrongfully by failing to prevent employees from engaging in foreseeable and predictable wrongful acts.

118. CACI acted negligently and wrongfully by failing to discipline those who they knew, or with reasonable investigation could have determined, engaged in wrongful acts at Abu Ghraib.

119. CACI acted negligently and wrongfully by failing to take due care in hiring employees who had sufficient experience or training or certification in conducting interrogations of detainees, and deploying those employees to undertake interrogations in prisons in Iraq.

120. CACI acted negligently and wrongfully by failing to train their employees for the specialized task of interrogating detainees and by failing to sufficiently train their employees about the U.S. military law and policy prohibitions on war crimes, torture and cruel, inhuman and degrading treatment.

121. Lieutenant General Anthony R. Jones' AR15-6 Investigation of the Abu Ghraib Detention Facility and 205th Military Intelligence Brigade attributed abuses at Abu Ghraib to insufficient hiring or training by civilian contractors.

122. Despite obligations under its contract with the U.S. government and obligations under U.S. government regulations, CACI acted negligently and wrongfully by failing to supervise adequately their employees. CACI admitted on its web site that CACI employees in Iraq work under "minimal supervision."

123. CACI acted negligently and wrongfully by failing to investigate and report accusations of wrongdoing referred to it by CACI employees and military personnel, and committed or witnessed by their employees and agents, despite an obligation under U.S. law to discipline employees for improper conduct and to timely report misconduct to appropriate U.S. government officials.

124. CACI profited financially from their negligent misconduct. The United States paid CACI millions of dollars in exchange for its contractual promises to provide intelligence services. CACI's wrongfulness and negligence in failing to properly hire, train, supervise and discipline allowed CACI to increase its profits without adequately fulfilling its duties under the contract.

125. CACI failed to ensure that its employees and agents abided by the contract terms and with the Geneva Conventions.

126. CACI injured Plaintiffs and harmed the reputation of the United States throughout the world.

127. Plaintiffs suffered, and continue to suffer, extensive physical and mental harm from being tortured and abused by CACI employees and their co-conspirators.

128. Plaintiffs seek compensatory and punitive damages in an amount far in excess of the jurisdictional amount set forth in 28 U.S.C. § 1332 (\$75,000).

129. Plaintiffs seek any and all additional remedies (such as attorneys' fees) available under law.

**COUNT ONE  
TORTURE**

130. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

131. Defendants' acts and omissions were deliberate and intentional. Defendants acted purposefully to punish, intimidate, discriminate, and to obtain information from Plaintiffs, who were in their physical custody and control.

132. The acts committed by Defendants and their agents constitute torture in violation of the law of nations. The acts of torture committed against Plaintiffs include, among other things, beatings, placing plaintiffs in stress positions, forced nudity, sexual assault, death threats, withholding of food, water and necessary medical care, sensory deprivation, and intentional exposure to extremes of heat and cold. The acts, done by Defendants working under contract with the United States, directly contradicted the contract terms, domestic law and the United States' express policy against torture.

133. Defendants' misconduct caused grave and foreseeable injuries to Plaintiffs.

**COUNT TWO  
CIVIL CONSPIRACY TO TORTURE**

134. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

135. Defendants knowingly and/or purposefully agreed, or took concerted action, with each other and others to participate in a series of unlawful acts.

136. Each Defendant performed one or more overt acts pursuant to and in furtherance of the common scheme.

137. Defendants are liable for torture because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to torture Plaintiffs.

138. Defendants' knowing and/or purposeful participation in the conspiracy caused grave and foreseeable damages to Plaintiffs.

**COUNT THREE  
AIDING AND ABETTING TORTURE**

139. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

140. Defendants knowingly and substantially assisted and/or purposefully and substantially assisted others in torturing Plaintiffs.

141. Defendants are liable for the torture because they aided and abetted others who were torturing Plaintiffs.

142. Defendants' knowing and/or purposeful substantial assistance caused grave and foreseeable damages to Plaintiffs.

**COUNT FOUR  
CRUEL, INHUMAN OR DEGRADING TREATMENT**

143. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

144. The acts described herein had the intent and the effect of causing serious mental and physical pain and suffering to Plaintiffs, grossly humiliating and debasing the Plaintiffs, and forcing them to act against their will and conscience, inciting fear and anguish and breaking their physical or moral resistance.

145. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to subject Plaintiffs to cruel, inhuman or degrading treatment.

146. Defendants are liable for their conduct that led to the cruel, inhuman and degrading treatment of Plaintiffs.

147. Defendants' misconduct caused grave and foreseeable injuries to Plaintiffs.

**COUNT FIVE  
CIVIL CONSPIRACY TO TREAT PLAINTIFF IN  
A CRUEL, INHUMAN OR DEGRADING MANNER**

148. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

149. Defendants knowingly and/or purposefully agreed, or took concerted action, with each other and others to participate in a series of unlawful acts.

150. Each Defendant performed one or more overt acts pursuant to and in furtherance of the common scheme.

151. Defendants are liable for the cruel, inhuman, and degrading treatment of Plaintiffs because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to so treat Plaintiffs.

152. Defendants' knowing and/or purposeful participation in the conspiracy caused grave and foreseeable damages to Plaintiffs.

**COUNT SIX  
AIDING AND ABETTING  
CRUEL, INHUMAN AND DEGRADING TREATMENT**

153. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

154. Defendants knowingly and substantially assisted and/or purposefully and substantially assisted others in treating Plaintiffs in a cruel, inhuman, and degrading manner.

155. Defendants are liable for the injuries caused by the cruel, inhuman, and degrading treatment because they substantially aided and abetted others in so treating Plaintiffs.

156. Defendants' knowing and/or purposeful substantial assistance to others caused grave and foreseeable damages to Plaintiffs.

**COUNT SEVEN  
WAR CRIMES**

157. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

158. Defendants' acts were deliberate, willful, intentional, wanton, malicious, and oppressive and constitute grave breaches of the Geneva Conventions and war crimes. These acts included torture, cruel, inhuman and degrading treatment, and willfully causing great suffering and serious bodily injury to Plaintiffs.

159. Defendants' acts took place during a period of armed conflict, in connection with hostilities.

160. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to commit war crimes against Plaintiffs.

161. Defendants are liable for their conduct that constitutes war crimes.

162. Defendants' misconduct caused grave and foreseeable injuries to Plaintiffs.

**COUNT EIGHT  
CIVIL CONSPIRACY TO COMMIT WAR CRIMES**

163. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

164. Defendants knowingly and/or purposefully agreed, or took concerted action, with each other and others to participate in a series of unlawful acts.

165. Each Defendant performed one or more overt acts pursuant to and in furtherance of the common scheme.

166. Defendants are liable for war crimes against Plaintiff because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to commit war crimes against Plaintiffs.

167. Defendants' knowing and/or purposeful participation in the conspiracy caused grave and foreseeable damages to Plaintiffs.

**COUNT NINE  
AIDING AND ABETTING COMMISSION OF WAR CRIMES**

168. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

169. Defendants knowingly and substantially assisted and/or purposefully and substantially assisted others in committing war crimes against Plaintiffs.

170. Defendants are liable for the injuries caused by the war crimes because they substantially aided and abetted others in committing war crimes against Plaintiffs.

171. Defendants' knowing and/or purposeful substantial assistance to others in the commission of war crimes caused grave and foreseeable damages to Plaintiffs.

**COUNT TEN  
ASSAULT AND BATTERY**

172. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

173. Defendants unlawfully intended to and did inflict immediate injury upon Plaintiffs.

174. Defendants intentionally assaulted, battered, and made other offensive contacts, and aided and abetted the assaulting and battering and offensively contacting, of the Plaintiffs.

175. Plaintiffs did not consent to the offensive contacts. Plaintiffs feared for their personal safety and felt threatened by Defendants' actions.

176. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to commit the assaults and batteries.

177. Defendants' acts caused grave and foreseeable damages to Plaintiffs.

**COUNT ELEVEN  
CIVIL CONSPIRACY TO ASSAULT AND BATTER**

178. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

179. Defendants agreed, or took concerted action, with each other and others to participate in a series of unlawful acts.

180. Each Defendant performed one or more overt acts pursuant to and in furtherance of the common scheme.

181. Defendants are liable for the assaults and batteries against Plaintiffs because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to commit the assaults and batteries.

182. Defendants' knowing participation in the conspiracy to assault and batter caused grave and foreseeable damages to Plaintiffs.

**COUNT TWELVE  
AIDING AND ABETTING  
ASSAULTS AND BATTERIES**

183. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

184. Defendants knowingly and substantially assisted others in assaulting and battering Plaintiffs.

185. Defendants are liable for the injuries caused because they aided and abetted others in assaulting and battering Plaintiffs.

186. Defendants' knowing and substantial assistance to others caused grave and foreseeable damages to Plaintiffs.

**COUNT THIRTEEN  
SEXUAL ASSAULT AND BATTERY**

187. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

188. Plaintiffs were sexually assaulted and battered by Defendants and their co-conspirators.

189. Defendants intended to, and did, cause offensive sexual contacts with intimate parts of Plaintiffs. Defendants acted to cause Plaintiffs imminent apprehension of harmful and offensive contact with their intimate parts.

190. Plaintiffs did not consent to the contacts. Plaintiffs feared for their personal safety and felt threatened by Defendants' actions.

191. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to sexually assault and batter Plaintiffs.

192. Defendants' acts caused grave and foreseeable damages to Plaintiffs.

**COUNT FOURTEEN  
CIVIL CONSPIRACY TO SEXUALLY ASSAULT AND BATTER**

193. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

194. Defendants agreed, or took concerted action, with each other and others to participate in a series of unlawful acts.

195. Each Defendant performed one or more overt acts pursuant to and in furtherance of the common scheme.

196. Defendants are liable for the sexual assaults and batteries against Plaintiffs because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to sexually assault and batter Plaintiffs.

197. Defendants' knowing participation in the conspiracy caused grave and foreseeable damages to Plaintiffs.

**COUNT FIFTEEN  
AIDING AND ABETTING  
SEXUAL ASSAULTS AND BATTERIES**

198. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

199. Defendants knowingly and substantially assisted others in sexually assaulting Plaintiffs.

200. Defendants are liable for the injuries caused by the crimes because they substantially aided and abetted others in sexually assaulting and battering Plaintiffs.

201. Defendants' knowing and substantial assistance to others caused grave and foreseeable damages to Plaintiffs.

**COUNT SIXTEEN  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

202. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

203. Defendants intentionally inflicted severe emotional distress by way of extreme and outrageous conduct on Plaintiffs. Defendants intended or recklessly disregarded the probability of Plaintiffs suffering emotional distress when directing offensive conduct toward Plaintiffs or carrying out offensive conduct while aware of Plaintiffs' presence.

204. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to inflict emotional distress on Plaintiffs.

205. Defendants' acts caused grave and foreseeable injuries to Plaintiffs.

**COUNT SEVENTEEN  
CIVIL CONSPIRACY TO INFLICT EMOTIONAL DISTRESS**

206. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

207. Defendants agreed, or took concerted action, with each other and others to participate in a series of unlawful acts.

208. Each Defendant performed one or more overt acts pursuant to and in furtherance of the common scheme.

209. Defendants are liable for intentional infliction of emotional distress on Plaintiffs because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified, and conspired with others to inflict emotional distress on Plaintiffs.

210. Defendants' knowing participation in the conspiracy to intentionally inflict emotional distress caused grave and foreseeable damages to Plaintiffs.

**COUNT EIGHTEEN  
AIDING AND ABETTING  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

211. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

212. Defendants knowingly and substantially assisted others in intentionally inflicting emotional distress upon Plaintiffs.

213. Defendants are liable for the injuries caused by the intentional infliction of emotional distress because they substantially aided and abetted others in causing the emotional distress to Plaintiffs.

214. Defendants' knowing and substantial assistance to others caused grave and foreseeable damages to Plaintiffs.

**COUNT NINETEEN  
NEGLIGENT HIRING AND SUPERVISION**

215. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

216. Defendants acted negligently and directly harmed Plaintiffs by taking or failing to take one or more of the following steps:

- (a) failing to take the appropriate steps in hiring proper personnel to perform services;
- (b) failing to screen properly personnel before their hiring;
- (c) failing to train personnel or subsidiary personnel properly to perform services in a legal fashion;
- (d) failing to investigate allegations of torture and abuse carried out by their subsidiaries or their employees;
- (e) failing to report to the government allegations of torture and abuse carried out and witnessed by their agents;
- (f) failing to adequately supervise and discipline their employees; and
- (g) negligently setting the conditions that facilitated the abuse.

217. The negligence of CACI directly and foreseeably harmed Plaintiffs.

**COUNT TWENTY  
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

218. All preceding paragraphs are hereby incorporated by reference as if fully set forth herein.

219. Defendants negligently inflicted severe emotional distress on Plaintiffs.

220. Defendants had a duty to Plaintiffs, which they breached.

221. The negligence of CACI directly and foreseeably harmed Plaintiffs.

**JURY DEMAND AND PRAYER FOR DAMAGES**

222. Plaintiffs seek a jury trial. Plaintiffs were all seriously physically and mentally injured, and are entitled to any and all remedies available as a result of the conduct alleged herein, including, but not limited to:

- (a) compensatory damages for physical, mental, and economic injuries;
- (b) punitive damages in an amount sufficient to punish Defendants for engaging in human rights abuses and deter similar behavior; and
- (c) any attorneys' fees and costs permitted by law.

December 26, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of December, 2012, I caused the foregoing Second Amended Complaint to be filed via ECF upon:

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