

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND, GREENBELT DIVISION**

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|----------------------------|---|------------------------|
| WISSAM ABDULLATEFF | : | CIVIL ACTION |
| SA'EED AL-QURAIISHI, | : | NO. 8:08-cv-1696 |
| Amman, Jordan | : | |
| | : | Judge Peter J. Messite |
| WALEED UBAID DAWOOD | : | |
| SALMAN | : | |
| Baghdad, Iraq | : | |
| UDAY FADHIL SHIWEJI | : | |
| MUTLAQ AL MAMORI | : | |
| Baghdad, Iraq | : | |
| ADNAN FADHIL MUHEE | : | |
| AL-NIAMEY | : | |
| Baghdad, Iraq | : | |
| AHMED FAKHRI ZA'ALL | : | |
| KAREEM | : | |
| Baghdad, Iraq | : | |
| SARHAN ABDULAH | : | |
| ZA'ALL KAREEM | : | |
| Baghdad, Iraq | : | |
| GHAZWAN JASIM | : | |
| MOHAMMED AL GHRERI | : | |
| Baghdad, Iraq | : | |
| SUDAD ALI HAMEED AL OGAIDI | : | |
| Baghdad, Iraq | : | |
| ALI ABDULLAH SUAIHIL | : | |
| SALMAN AL JANABI | : | |

SHIHAB AHMED DAFFAR :
AL-SAIDI :
Baghdad, Iraq :
:
SADIQ SATTORI KHAZA'AL :
Baghdad, Iraq :
:
RAFE'A ABBAS ALI :
MUTAR AL-OBAIDI :
Baghdad, Iraq :
:
EMAD KHUDHAYIR :
SHAHUTH AL-JANABI :
Baghdad, Iraq :
:
SA'ADOON ALI :
HAMEED AL-OGAIDI :
Baghdad, Iraq :
:
MOHAMMED ABDWIHED TOWFEK :
AL-TAEE :
Baghdad, Iraq :
:
EMAD UBAID HAMAD :
AL- BADRANI :
Baghdad, Iraq :
:
HUSHAM HALOOB :
MUTAR AL-ALWANI :
Baghdad, Iraq :
:
EMAD QASIM MOHAMMED :
AL-HALBOSI :
Baghdad, Iraq :
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MUNSI TALAL SAMEER :
AL-FAHDAWI :
Baghdad, Iraq :
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QASIM MOHAMMED :
ABDULLAH :
Baghdad, Iraq :
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MAJID JASSIM HUMADI :
Baghdad, Iraq :
:
NAZAR TAHA KAHTAN :
Baghdad, Iraq :
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MOHAMMED QASIM :
MOHAMAD :
Baghdad, Iraq :
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ABDULQADIR MUTHANA :
ABDULWAHAB :
Baghdad, Iraq :
:
ABDULAH JAWAD :
KADHUM AL-MUHAMADI :
Baghdad, Iraq :
:
MOUSA ABDULWAHID :
Baghdad, Iraq :
:
AHMED MAHDI SALIH :
Baghdad, Iraq :
:
IBRAHEEM JAWAD :
AL- MUHAMADI :
Baghdad, Iraq :
:
IBRAHEEM TAWFEEQ :
SHAFI HUSSEIN :
Baghdad, Iraq :
:
SAFIALDEEN AHMED :
FARHAN AL JUMAILI :
Baghdad, Iraq :
:

DHIAALDEEN AHMED FARHAN
Baghdad, Iraq

TAWFEEQ SHAQI HUSSEIN
AL-HASHIMI
Baghdad, Iraq

BAHAALDEEN AHMED
FARHAN
Baghdad, Iraq

QAIS KAMEL HUMADI
SALIH
Baghdad, Iraq

MURTADHA MOHAMMED SAED
Baghdad, Iraq

SAMEER NASEER YASSEN
Baghdad, Iraq

ALA'A AHMED SALIH
AL FAHDAWI
Baghdad, Iraq

FAIZ AHMED SALIH
AL FAHDAWI
Baghdad, Iraq

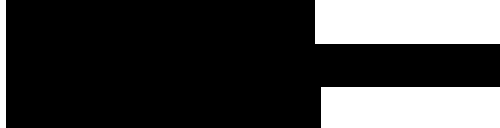
ADNAN TALAB ABID
SALIH AL ZUBAEI
Baghdad, Iraq

JABBAR KAMIL FARHAN
AL TIMEEMI
Baghdad, Iraq

BILAL ALI HAMID

AL-ZUBAI :
Baghdad, Iraq :
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NEMA'A AHMED :
ALI JASIM :
Baghdad, Iraq :
:
OMER JAMEEL THALIJ :
AL-ZUBAEI :
Baghdad, Iraq :
:
ALI MUHSIN ALI :
Baghdad, Iraq :
:
TALIB IBRAHEEM :
HAMDAN AL-ZUBAEI :
Baghdad, Iraq :
:
MARWAN HASHIM ALI :
AL-SA'ADOON :
Baghdad, Iraq :
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MUHEEB RESHAN :
AL-OBAIDI :
Baghdad, Iraq :
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MUDHIR ABDULLAH :
HAMADI AL-DULAIMI :
Baghdad, Iraq :
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SABAH DAHAM RASHEED :
AL-DULAIMI :
Baghdad, Iraq :
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FALIH AHMED HAMDAN :
AL-ZUBAEI :
Baghdad, Iraq :
:
ABDULKAREEM UDA :

SHIKIR AL-ZUBAEI :
Baghdad, Iraq :
:
RA'AD AHMED HASSOON :
AL-FALAH :
Baghdad, Iraq :
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MOHAMMED HAMID :
HASSON AL-FALAH :
Baghdad, Iraq :
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BASHEER TUMA AMEEN :
Baghdad, Iraq :
:
KHALISS LATEEF TARRAD :
Baghdad, Iraq :
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ISMAEL HIMOOD MAHMOUD :
AL-FALOOJI :
Baghdad, Iraq :
:
MOHAMMED JASIM ALWAN :
ABDULLAH :
Baghdad, Iraq :
:
HASSAN UBAID ENAD :
Baghdad, Iraq :
:
RAID RAA'AD MARAADH :
Baghdad, Iraq :
:
LUAY ADIB JIWAD :
Baghdad, Iraq :
:
MOHAMMED MUNTHIR HAMAD :
Baghdad, Iraq :
:
SA'AD HASSAN ALWAN :
AL JUBOORI :

Baghdad, Iraq :
:
ZAID AHMED AJAJ :
Baghdad, Iraq :
:
Plaintiffs, :
:
v. :
:
ADEL NAKHLA :
 :
:
L-3 SERVICES, INC. :
1320 Braddock Place :
Alexandria, VA 22314 :
:
Defendants :
:

SECOND AMENDED COMPLAINT

1. Wissam Abdullateff Sa'eed Al-Quraishi, a 37-year old father of three, was imprisoned and tortured. He and the other plaintiffs listed below bring this tort action against those who tortured, and conspired with others to torture, them: Adel Nakhla, a resident of this District, and L-3 Services (formerly Titan Corporation), a publicly-traded corporation that made millions of dollars selling the services of Nakhla and other employees to the United States military.

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 28 U.S.C. § 1391(a)(3) and § 1391(b)(2).

PARTIES

4. Plaintiffs are innocent Iraqis who were badly tortured by defendants and their co-conspirators, as further described below.

5. Defendant Adel Nakhla is an individual residing at [REDACTED]
[REDACTED].

6. Defendant Nakhla was employed by Defendant L-3 Services as a translator in Iraq, including at Abu Ghraib prison, from June 2003 to May 2004.

7. Defendant L-3 Services, Inc. is a publicly-traded Delaware corporation with headquarters located at 1320 Braddock Place, Alexandria, Virginia 22314. L-3 employed all the civilian translators used by the military in Iraq, including Defendant Nakhla.

8. L-3 received millions of dollars from the United States in exchange for providing the United States Army with services, including translation and interrogation services.

THE TORTURE SUFFERED BY PLAINTIFFS

9. Plaintiff Wissam Abdullateff Sa'eed Al-Quraishi was repeatedly and gravely tortured at Abu Ghraib prison and other locations.

10. Mr. Al-Quraishi was arrested on or about November 1, 2003.

11. During his arrest, an L-3 employee slapped and beat Mr. Al-Quraishi.

12. Mr. Al-Quraishi was hung on a pole for seven days. He was only released from his hanging position in order to be interrogated.

13. During this initial seven-day period of interrogations, Mr. Al-Quraishi was hit, kicked, and subjected to electrical shocks.

14. He was also subjected to mock executions by having a gun aimed at his head, and the trigger pulled.

15. During his time in the Abu Ghraib hard site, Mr. Al-Quraishi was forced to eat when he was fasting for religious reasons.

16. L-3 employee Adel Nakhla held Mr. Al-Quraishi down while a co-conspirator poured feces on him.

17. L-3 employee Adel Nakhla forced Mr. Al-Quraishi into the showers, and forcibly shaved off all of his hair - including his eyebrows.

18. L-3 employee Adel Nakhla stripped Mr. Al-Quraishi naked and poured cold water on him.

19. L-3 employee Adel Nakhla and other co-conspirators stripped Mr. Al-Quraishi and other prisoners naked. They placed Mr. Al-Quraishi on the ground, and placed a box on top of him. They then stacked another prisoner on top of the box, and continued to pile prisoners and boxes in alternating rows on top of Mr. Al-Quraishi.

20. Mr. Al-Quraishi personally and directly observed L-3 employee Adel Nakhla forcibly holding down a fourteen-year old boy as his co-conspirator raped the boy by placing a toothbrush in his anus.

21. Plaintiff Emad Khudayir Shahuth Al-Janabi, a 43 year old blacksmith, was repeatedly and gravely tortured at Abu Ghraib prison.

22. Mr. Al-Janabi was detained on September 20, 2003.

23. Mr. Al-Janabi was forced into a wooden crate.

24. During interrogation, the interrogator began to press his fingers into Mr. Al-Janabi's eyes. Mr. Al-Janabi screamed in agony, as the interrogator, speaking through an L-3 translator, threatened to claw out his eyes. Mr. Al-Janabi has visible scars from this torture.

25. Mr. Al-Janabi was slammed into a wall until he became unconscious.

26. Mr. Al-Janabi was dragged (still hooded and wearing nothing but his shorts) across stones and dirt. His captors, again speaking through an L-3

translator, told him he was going to be executed along with his brother and nephew.

27. Mr. Al-Janabi was stripped naked and threatened with rape. He was photographed completely naked. After being photographed naked, his hands and legs were chained and a hood was placed on his head. He was placed on a cement floor, still naked. He passed out from the pain.

28. Mr. Al-Janabi did not have a prisoner number and was treated as a ghost detainee.

29. Mr. Al-Janabi was repeatedly hung by his arms from the bed frame and from the cell bars so that his feet could not touch the ground.

30. Mr. Al-Janabi was hung upside down, with his feet chained to the steel slats of the top bunkbed. He was kept hanging until he lost consciousness.

31. Mr. Al-Janabi was placed naked in a pyramid with other prisoners.

32. Mr. Al-Janabi was subjected to having his penis repeatedly pulled.

33. Mr. Al-Janabi was deprived of sleep for extended periods of time.

34. Mr. Al-Janabi was threatened with dogs.

35. Mr. Al-Janabi was repeatedly forced to crawl naked along the rough cement floor, do push-ups and other physical activity to the point of exhaustion.

36. Mr. Al-Janabi was kept imprisoned in the hard site cell for approximately 48 days. Afterwards, he was released into a different part of the

prison. After being held for more than ten months in prison, Mr. Al-Janabi was released on or about July 2004, without being charged with any crime.

37. Plaintiff Sa'adoon Ali Hameed Al-Ogaidi was detained September 29, 2003.

38. Mr. Al-Ogaidi was beaten by the L-3 translator participating in the raid.

39. Mr. Al-Ogaidi was forced to stay awake for several days. Whenever Mr. Al-Ogaidi started to fall asleep, his cage would be rattled and banged with a stick to prevent sleep.

40. Mr. Al-Ogaidi was treated as a "ghost detainee."

41. Mr. Al-Ogaidi was threatened with death.

42. Mr. Al-Ogaidi was forcefully stripped of his clothes and locked in solitary confinement for a period of time. Mr. Al-Ogaidi was then paraded naked in front of the other prisoners.

43. Mr. Al-Ogaidid was handcuffed and hung from the bars of his cell, naked.

44. Mr. Al-Ogaidi was handcuffed through the bars to another prisoner.

45. Mr. Al-Ogaidi was taken to an interrogation room where he was kept naked and forced to kneel with his hands cuffed behind his back. Mr. Al-Ogaidi

was beaten and threatened with being taken to Guantanamo Bay by an interrogator and an L-3 translator.

46. On or about December 9, 2004, after more than one year of detention, Mr. Al-Ogaidi was released without having been charged with any crime.

47. Plaintiff Mr. Mohammed Abdwihed Towfek Al-Taee was repeatedly and gravely tortured during his imprisonment in American-controlled prisons.

48. Mr. Al-Taee was detained on August 21, 2003.

49. While detained, Mr. Al-Taee was forced to consume so much water that he began to vomit blood. After having vomited several times, Mr. Al-Taee fainted.

50. Mr. Al-Taee's torturers tied a plastic line tight around Mr. Al-Taee's penis and forced him to consume even more liquid.

51. Mr. Al-Taee was struck and beaten with metal instruments.

52. Mr. Al-Taee was deprived of food.

53. Mr. Al-Taee was deprived of sleep for extended periods of time.

54. Mr. Al-Taee was placed in painful stress positions for extended periods of time.

55. Mr. Al-Taee was threatened with death.

56. Mr. Al-Taee was suffocated with a hood.

57. Mr. Al-Taee was forced to engage in physical activity to the point of exhaustion.

58. After being held in prison for nine months, Mr. Al-Taee was released on or about May 28, 2004, without being charged with a crime.

59. Plaintiff Waleed Ubaid Dawood Salman was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

60. Mr. Salman was detained in November 2003. Mr. Salman was held at both Al Saqir camp and at Abu Ghraib prison.

61. While being detained, Mr. Salman was beaten on the head. While being transported to prison, he suffered serious injury to his leg from a roadside bomb. He failed to receive adequate medical attention for this injury, and his leg developed gangrene and was eventually amputated.

62. After being held in prison for months, Mr. Salman was released in 2004 without being charged with a crime.

63. Plaintiff Uday Fadhil Shiweji Mutlaq Al Mamori was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

64. Mr. Al-Mamori was detained on December 18, 2003 and held at Abu Ghraib prison.

65. Mr. Al-Mamori was beaten.

66. After being held in prison for two and a half years, Mr. Al-Mamori was released in July 2006 without being charged with a crime.

67. Plaintiff Adnan Fadhil Muhee Al-Niamey was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

68. Mr. Al-Niamey was detained on March 27, 2004, and held at Baghdad Airport and Abu Ghraib prison.

69. Mr. Al-Niamey was beaten.

70. Mr. Al-Niamey was kept naked.

71. Mr. Al-Niamey was subjected to having cold water thrown over him while he was forced to be naked.

72. Mr. Al-Niamey was kicked in the face, and had his head, chest and legs stepped on.

73. After being held in prison for almost four years, Mr. Al-Niamey was released from Abu Ghraib on January 5, 2008, without being charged with a crime.

74. Plaintiff Ahmed Fakhri Za'all Kareem was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

75. Mr. Kareem was detained on August 12, 2004, and held at Abu Ghraib prison.

76. Mr. Kareem was beaten and kicked while being interrogated at Abu Ghraib prison.

77. Mr. Kareem was threatened with death.

78. After being held for 17 months, Mr. Kareem was released on January 6, 2006, without being charged with a crime.

79. Plaintiff Sarhan Abdulah Za'all Kareem was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

80. Mr. Kareem was detained on December 12, 2004, and was held at Camp Bucca, Garsso Military Base and Abu Ghraib.

81. Mr. Kareem was beaten.

82. Mr. Kareem was raped.

83. Mr. Kareem was forced to be naked in his cell.

84. After seven months in prison, Mr. Kareem was released on July 9, 2005 without being charged with a crime.

85. Plaintiff Ghazwan Jasim Mohammed Al Ghreeri was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

86. Mr. Al Ghreri was detained on April 10, 2004 and held at Al Lihoom military base and Abu Ghraib prison.

87. Mr. Al Ghreri was beaten.

88. After nearly four years in prison, Mr. Al Ghreri was released on May 27, 2008, without being charged with a crime.

89. Plaintiff Sudad Ali Hameed Al Ogaidi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

90. Mr. Al-Ogaidi was detained on November 7, 2003, and held at Al Mahmoudia military base, Camp Bucca, and Abu Ghraib prison.

91. Mr. Al Ogaidi was beaten and kicked.

92. After over nine months in prison, Mr. Al Ogaidi was released on September 15, 2004, without being charged with a crime.

93. Plaintiff Ali Abdullah Suaihil Salman Al Janabi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

94. Mr. Al Janabi was detained three times between October 2003 and November 2006, and was held at Balad military base, the Baghdad airport and Abu Ghraib.

95. Mr. Al Janabi was beaten.

96. After being held captive for over three years, Mr. Al Janabi was released for the third time on October 30, 2007, without being charged with a crime.

97. Plaintiff Amir Mohammed Ibraheem Al Ogaidi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

98. Mr. Al Ogaidi was detained on July 21, 2007, and held at Baghdad airport and Camp Bucca.

99. Mr. Al Ogaidi was beaten.

100. Mr. Al Ogaidi was released on September 5, 2007, without being charged with a crime.

101. Plaintiff Ahmed Salman Abdulhameed Al Alosi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

102. Mr. Al Alosi was detained on June 19, 2007, and held at Baghdad airport and an unknown prison.

103. Mr. Alosi was beaten.

104. After three months in prison, Mr. Al Alosi was released on September 5, 2007, without being charged with a crime.

105. Plaintiff Mohammed Taha Himoud Al Majma'ae was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

106. Mr. Al Majma'ae was detained on July 21, 2007, and held at Al Faris military base and Camp Cropper.

107. Mr. Al Majma'ae was beaten.

108. Mr. Al Majma'ae and threatened with unleashed dogs.

109. Mr. Al Majma'ae was threatened with burning his eyes with lit cigarettes.

110. After over a month in prison, Mr. Al Mahma'ae was released from prison on September 5, 2007, without being charged with a crime.

111. Plaintiff Mohammed Salih Ibraheem Dhahir was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

112. Mr. Dhahir was detained on July 21, 2007, and held at Al Faris military base.

113. Mr. Dhahir was beaten.

114. Mr. Dhahir was threatened with unleashed dogs.

115. After over a month in prison, Mr. Dhahir was release on September 5, 2007, without being charged with a crime.

116. Plaintiff Hadi Ahmed Slebi Al-Hamadani was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

117. Mr. Al-Hamadani was detained on November 25, 2005.

118. Mr. Al-Hamadani was strangled.

119. Mr. Al-Hamadani was beaten and kicked.

120. Mr. Al-Hamadani's head was stepped on.

121. After over two years in prison, Mr. Al-Hamadani was released on January 8, 2008, without being charged with a crime.

122. Plaintiff Ismail Turkey Moutar Dirweesh was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

123. Mr. Dirweesh was detained on May 28, 2006, and held at Al Habania military base, Baghdad airport and Abu Ghraib.

124. Mr. Dirweesh was beaten and kicked.

125. Mr. Dirweesh was subjected to sensory deprivation by being kept in a black coffin for an extended period of time.

126. Mr. Dirweesh was forced to be naked.

127. Mr. Dirweek was dragged by rope across the ground while naked.

128. Mr. Dirweesh was subjected to having urine and feces thrown on him.

129. After nearly two years in prison, Mr. Dirweesh was released from prison on March 16, 2008.

130. Plaintiff Yasseen Abid Mahmoud Al Mashhadani was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

131. Mr. Al Mashhadani was held at Al Faris military base.

132. Mr. Al Mashhadani was beaten.

133. Mr. Al Mashhadani was subjected to being kept naked in his cell.

134. Mr. Al Mashhadani was later released without being charged with a crime.

135. Plaintiff Ahmed Dhia Abdulah Ali Al Mahdawi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

136. Mr. Al Mahdawi was detained on November 13, 2004, and held at Al Adhamia palace, Camp Cropper, Al Taji Camp and Abu Ghraib prison.

137. While detained, Mr. Al Mahdawi beaten on the head until bleeding.

138. Mr. Al Mahdawi was electrocuted.

139. Mr. Al Mahdawi was forced to be naked.

140. Mr. Al Mahdawi was sexually abused.

141. After nearly two years in prison, Mr. Al Mahdawi was released on October 11, 2007, without being charged with a crime.

142. Plaintiff Mohammed Rekan Aggab Al- Fahdawi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

143. Mr. Al-Fahdawi was detained on July 21, 2007, and held at Al Faris military base and Camp Cropper.

144. While detained, Mr. Al Fahdawi was beaten.

145. Mr. Al-Fahdawi was subjected to death threats.

146. After over a month in prison, Mr. Al Fahdawi was released on September 5, 2007, without being charged with a crime.

147. Plaintiff Shihab Ahmed Daffar Al-Saidi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

148. Mr. Al-Saidi was detained on December 31, 2003, and held at Al-Lihoom military base, Tariq military base and Abu Ghraib.

149. While detained, Mr. Al-Saidi was beaten.

150. Mr. Al-Saidi was forced to stand in his cell overnight.

151. Mr. Al-Saidi had cold water thrown over him.

152. Mr. Al-Saidi was threatened with dogs.

153. Mr. Al-Saidi was kept naked in his cell.

154. After five months in prison, Mr. Al-Saidi was released on May 21, 2004, without being charged with a crime.

155. Plaintiff Sadiq Sattori Khaza'al was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

156. Mr. Khaza'al was detained on January 21, 2004, and held at Al-Lihoom military base, Tariq Military base and Abu Ghraib prison.

157. Mr. Khaza'al was beaten.

158. Mr. Khaza'al was subjected to sensory and sleep deprivation.

159. Mr. Khaza'al was subjected to having cold water thrown over him in his cell.

160. Mr. Khaza'al was kept naked in his cell.

161. Mr. Khaza'al was threatened with a dog.

162. After over three months in prison, Mr. Khaza'al was released on May 1, 2004, without being charged with a crime.

163. Plaintiff Rafe'a Abbas Ali Mutar Al-Obaidi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

164. Mr. Al-Obaidi was detained on January 20, 2004, and was held at Al-Lihoom military base, Tariq camp, Camp Bucca and Abu Ghraib prison.

165. Mr. Al-Obaidi was urinated on.

166. Mr. Al-Obaidi was forced to be naked.

167. Mr. Al-Obaidi was subjected to being photographed naked.

168. Mr. Al-Obaidi was beaten.

169. Mr. Al-Obaidi was released on July 30, 2005, without being charged with a crime.

170. Plaintiff Emad Ubaid Hamad Al- Badrani was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

171. Mr. Al- Badrani was detained on February 15, 2005, and was held at Tariq Camp and Abu Ghraib prison.

172. Mr. Al- Badrani was beaten.

173. After approximately four months in prison, Mr. Al- Badrani was released on July 2, 2005, without being charged with a crime.

174. Plaintiff Husham Haloob Mutar Al-Alwani was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

175. Mr. Al-Alwani was detained on November 27, 2004, and held at Tariq Camp and Abu Ghraib prison.

176. Mr. Al-Alwani was beaten.

177. After being held in prison for nearly for months, Mr. Al-Alwani was released on March 25, 2005, without being charged with a crime.

178. Plaintiff Emad Qasim Mohammed Al-Halbosi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

179. Mr. Al-Halbosi was detained on July 30, 2005, and held at an American base in Falluja, Camp Bucca and Abu Ghraib prison.

180. Mr. Al-Halbosi was beaten.

181. After being held in prison for nearly one year, Mr. Al-Halbosi was released on June 19, 2006, without being charged with a crime.

182. Plaintiff Munsir Talal Sameer Al-Fahdawi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

183. Mr. Al-Fahdawi was detained on November 12, 2004, and held at Abu Ghraib prison.

184. Mr. Al-Fahdawi was beaten.

185. After being held in prison for nearly seven months, Mr. Al-Fahdawi was released on June 7, 2006, without being charged with a crime.

186. Plaintiff Qasim Mohammed Abdullah was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

187. Mr. Abdullah was detained on July 30, 2005, and held at Tariq Camp and Abu Ghraib prison.

188. Mr. Abdullah was beaten.

189. After being held in prison for over three months, Mr. Abdullah was released on November 1, 2005, without being charged with a crime.

190. Plaintiff Majid Jassim Humadi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

191. Mr. Humadi was detained on February 14, 2005, and held at Tariq Camp and Abu Ghraib prison.

192. Mr. Humadi was beaten.

193. After being held in prison for over fifteen months, Mr. Humadi was released on May 5, 2006, without being charged with a crime.

194. Plaintiff Nazar Taha Kahtan was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

195. Mr. Kahtan was detained on July 30, 2005, and held at an American base in Falluja city and Abu Ghraib prison.

196. Mr. Kahtan was beaten.

197. After being held in prison for over eleven months, Mr. Kahtan was released on June 19, 2006, without being charged with a crime.

198. Plaintiff Mohammed Qasim Mohamad was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

199. Mr. Mohamad was detained on July 30, 2005, and held at Tariq Camp.

200. Mr. Mohamad was beaten.

201. After being held in prison for over eleven months, Mr. Mohamad was released on August 5, 2006, without being charged with a crime.

202. Plaintiff Abdulqadir Muthana Abdulwahab was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

203. Mr. Abdulwahab was detained on November 11, 2004, and held at an American base in Falluja and Abu Ghraib prison.

204. Mr. Abdulwahab was beaten.

205. After being held in prison for over four months, Mr. Abdulwahab was released on March 19, 2005, without being charged with a crime.

206. Plaintiff Abdulah Jawad Kadhum Al-Muhamadi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

207. Mr. Al-Muhamadi was detained on January 8, 2006, and held at an American base in Falluja.

208. Mr. Al-Muhamadi was beaten.

209. Mr. Al-Muhamadi was released on January 22, 2006, without being charged with a crime.

210. Plaintiff Mousa Abdulwahid was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

211. Mr. Abdulwahid was detained on November 27, 2004, and held at an American base in Falluja and Abu Ghraib prison.

212. Mr. Abdulwahid was beaten.

213. After over a year in prison, Mr. Abdulwahid was released on January 5, 2006, without being charged with a crime.

214. Plaintiff Ahmed Mahdi Salih was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

215. Mr. Salih was detained on February 7, 2005, and held at an American base in Falluja and Abu Ghraib prison.

216. Mr. Salih was beaten.

217. After nearly a year in prison, Mr. Salih was released on January 5, 2006, without being charged with a crime.

218. Plaintiff Ibraheem Jawad Al- Muhamadi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

219. Mr. Al- Muhamadi was detained on January 8, 2006, and held at an American base in Falluja.

220. Mr. Al- Muhamadi was beaten.

221. Mr. Al- Muhamadi was released on January 22, 2006, without being charged with a crime.

222. Plaintiff Ibraheem Tawfeeq Shafi Hussein was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

223. Mr. Hussein was detained on February 25, 2006, and held at Tariq Camp, Camp Bucca and Abu Ghraib prison.

224. Mr. Hussein was beaten.

225. After four months in prison, Mr. Hussein was released on June 27, 2006, without being charged with a crime.

226. Plaintiff Safialdeen Ahmed Farhan Al Jumaili was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

227. Mr. Al Jumaili was detained on May 3, 2005, and held at Al-Mazra'a prison and Al-Sakanian prison.

228. Mr. Al Jumaili was beaten.

229. After over three months in prison, Mr. Al Jumaili was released on August 8, 2005, without being charged with a crime.

230. Plaintiff Dhiaaldeen Ahmed Farhan was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

231. Mr. Farhan was detained on May 3, 2005, and held at Al-Mazra'a prison and Al-Sakania prison.

232. Mr. Farhan was beaten.

233. After nearly four months in prison, Mr. Farhan was released on August 24, 2005, without being charged with a crime.

234. Plaintiff Tawfeeq Shaqi Hussein Al-Hashimi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

235. Mr. Al-Hashimi was detained on February 25, 2006, and held at Al-Muthana airport.

236. Mr. Al-Hashimi was beaten.

237. Mr. Al-Hashimi was released on March 3, 2006, without being charged with a crime.

238. Plaintiff Bahaaldeen Ahmed Farhan was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

239. Mr. Farhan was detained on May 3, 2005, and held at Al-Mazra'a prison and Al-Sakania prison.

240. Mr. Farhan was beaten.

241. After three months in prison, Mr. Farhan was released on August 8, 2005, without being charged with a crime.

242. Plaintiff Qais Kamel Humadi Salih was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

243. Mr. Salih was detained on December 12, 2004, and held at Tariq camp and Au Ghraib prison.

244. Mr. Salih was beaten.

245. After eighteen months in prison, Mr. Salih was released on June 19, 2006, without being charged with a crime.

246. Plaintiff Murtadha Mohammed Saed was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

247. Mr. Saed was detained on November 28, 2004, and held at Tariq camp and Abu Ghraib prison.

248. Mr. Saed was beaten.

249. After eighteen months in prison, Mr. Saed was released on June 19, 2006, without being charged with a crime.

250. Plaintiff Sameer Naseer Yassen was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

251. Mr. Yassen was detained on November 12, 2004, and held at Tariq camp, Camp Bucca and Abu Ghraib prison.

252. Mr. Yassen was beaten.

253. After thirteen months in prison, Mr. Yassen was released on January 15, 2006, without being charged with a crime.

254. Plaintiff Ala'a Ahmed Salih Al Fahdawi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

255. Mr. Al Fahdawi was detained on April 1, 2005, and held at Camp Bucca and Abu Ghraib prison.

256. Mr. Al Fahdawi was kept naked.

257. Mr. Al Fahdawi was forced into painful stress positions.

258. Mr. Al Fahdawi was deprived of food and sleep.

259. Mr. Al Fahdawi was subjected to temperature extremes.

260. After twenty months in prison, Mr. Al Fahdawi was released on November 27, 2006, without being charged with a crime.

261. Plaintiff Faiz Ahmed Salih Al Fahdawi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

262. Mr. Al Fahdawi was detained on April 1, 2005, and held at Camp Bucca and Abu Ghraib prison.

263. Mr. Al Fahdawi was kept naked.

264. Mr. Al Fahdawi was forced into painful stress positions.

265. Mr. Al Fahdawi was deprived of food and sleep.

266. Mr. Al Fahdawi was subjected to temperature extremes.

267. After twenty months in prison, Mr. Al Fahdawi was released on November 27, 2006, without being charged with a crime.

268. Plaintiff Adnan Talab Abid Salih Al Zubaei was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

269. Mr. Al Zubaei was detained on November 25, 2005, and held at Tariq camp and Abu Ghraib prison.

270. Mr. Al Zubaei was subjected to electric shocks.

271. Mr. Al Zubaei was subjected to sensory deprivation by being kept in a small dark wooden box for seven nights.

272. After nearly two years in prison, Mr. Al Zubaei was released on November 13, 2007, without being charged with a crime.

273. Plaintiff Jabbar Kamil Farhan Al Timeemi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

274. Mr. Al Timeemi was detained on May 1, 2004, and held at Al-Muthana airport and Abu Ghraib prison.

275. Mr. Al Timeemi was beaten.

276. Mr. Al Timeemi was subjected to electric shocks.

277. Mr. Al Timeemi was forced into stress positions.

278. Mr. Al Timeemi was chained by his hands and legs.

279. After 26 months in prison, Mr. Al Timeemi was released on July 8, 2006, without being charged with a crime.

280. Plaintiff Bilal Ali Hamid Al-Zubai was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

281. Mr. Al-Zubai was detained on July 19, 2005, and held at Tariq camp, Camp Bucca and Abu Ghraib prison.

282. Mr. Al-Zubai was beaten.

283. After 27 months in prison, Mr. Al-Zubai was released on October 22, 2007, without being charged with a crime.

284. Plaintiff Nema'a Ahmed Ali Jasim was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

285. Mr. Jasim was detained on February 1, 2005, and held at Abu Ghraib prison.

286. Mr. Jasim was beaten until he lost consciousness.

287. Mr. Jasim was subjected to electric shocks.

288. Mr. Jasim was threatened with unleashed dogs.

289. Mr. Jasim was chained by the hands and legs.

290. After eight months in prison, Mr. Jasim was released on October 12, 2005, without being charged with a crime.

291. Plaintiff Omer Jameel Thalij Al-Zubaei was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

292. Mr. Al-Zubaei, at the time a high school student, was detained on May 18, 2005, and held at Al-Mazra'a military base and Abu Ghraib prison.

293. Mr. Al-Zubaei was beaten until he lost consciousness.

294. Mr. Al-Zubaei was subjected to electric shocks.

295. Mr. Al-Zubaei was force fed food during his effort to observe religious fasting for Ramadan.

296. After thirteen months in prison, Mr. Al-Zubaei was released on July 8, 2006, without being charged with a crime.

297. Plaintiff Ali Muhsin Ali was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

298. Mr. Ali was detained on March 14, 2006, and held at Baghdad airport and Abu Ghraib prison.

299. Mr. Ali was subjected to temperature extremes.

300. After nine months in prison, Mr. Ali was released on January 16, 2007, without being charged with a crime.

301. Plaintiff Talib Ibraheem Hamdan Al-Zubaei was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

302. Mr. Al-Zubaei was detained on November 14, 2005, and held at Al-Bakir air force base.

303. Mr. Al-Zubaei was beaten.

304. Mr. Al-Zubaei was threatened with death.

305. Mr. Al-Zubaei was deprived of food and sleep.

306. After two and a half years in prison, Mr. Al-Zubaei was released on May 1, 2008, without being charged with a crime.

307. Plaintiff Marwan Hashim Ali Al-Sa'adoon was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

308. Mr. Al-Sa'adoon was detained on May 6, 2005, and held at Al-Kut military base and Abu Ghraib prison.

309. Mr. Al-Sa'adoon was beaten.

310. Mr. Al-Sa'adoon was threatened with being killed by a knife to his throat.

311. After more than two years in prison, Mr. Al-Sa'adoon was released on October 30, 2007, without being charged with a crime.

312. Plaintiff Muheeb Reshan Al-Obaidi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

313. Mr. Al-Obaidi was detained on October 15, 2006, and held at Camp Cropper and Camp Bucca.

314. Mr. Al-Obaidi was beaten.

315. Mr. Al-Obaidi was threatened with rape.

316. Mr. Al-Obaidi was threatened with death.

317. After over 14 months in prison, Mr. Al-Obaidi was released on December 19, 2007, without being charged with a crime.

318. Plaintiff Mudhir Abdullah Hamadi Al-Dulaimi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

319. Mr. Al-Dulaimi was detained on July 13, 2003, and held at Al-Adhamia military base and Camp Bucca.

320. Mr. Al-Dulaimi was beaten.

321. Mr. Al-Dulaimi was strangled.

322. Mr. Al-Dulaimi was subjected to sensory deprivation by being kept in a small dark box for 15 days.

323. Mr. Al-Dulaimi was subjected to beatings with stick while naked.

324. Mr. Al-Dulaimi was subjected to stress positions.

325. After over three months in prison, Mr. Al-Dulaimi was released on October 24, 2003, without being charged with a crime.

326. Plaintiff Sabah Daham Rasheed Al-Dulaimi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

327. Mr. Al-Dulaimi was detained on June 26, 2004, and held at Baghdad airport and Abu Ghraib prison.

328. Mr. Al-Dulaimi was beaten.

329. Mr. Al-Dulaimi had an interrogator step on his bladder where he had had a recent surgical procedure.

330. Mr. Al-Dulaimi was threatened with dogs.

331. Mr. Al-Dulaimi was subjected to electric shock.

332. After over three years in prison, Mr. Al-Dulaimi was released on October 10, 2007, without being charged with a crime.

333. Plaintiff Falih Ahmed Hamdan Al-Zubaei was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

334. Mr. Al-Zubaei was detained on November 14, 2005, and held at Balad military base and Abu Ghraib prison.

335. Mr. Al-Zubaei was beaten.

336. Mr. Al-Zubaei was subjected to sensory deprivation until he lost consciousness.

337. After over seven months in prison, Mr. Al-Zubaei was released on June 21, 2006, without being charged with a crime.

338. Plaintiff Abdulkareem Uda Shikir Al-Zubaei was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

339. Mr. Al-Zubaei was detained on October 12, 2004, and held at Al-Mazra'a military base, Camp Bucca and Abu Ghraib prison.

340. Mr. Al-Zubaei was beaten.

341. Mr. Al-Zubaei was deprived of food.

342. Mr. Al-Zubaei was subjected to sleep deprivation.

343. After over seventeen months in prison, Mr. Al-Zubaei was released on March 31, 2006, without being charged with a crime.

344. Plaintiff Ra'ad Ahmed Hassoon Al-Falahi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

345. Mr. Al-Falahi was detained on February 24, 2005, and held at Baghdad airport and Abu Ghraib prison.

346. Mr. Al-Falahi was beaten.

347. Mr. Al-Falahi was threatened with death.

348. Mr. Al-Falahi was kept naked.

349. Mr. Al-Falahi was subjected to having cold water poured over him while he was forced to be naked.

350. After nearly a year in prison, Mr. Al-Falahi was released on February 15, 2006, without being charged with a crime.

351. Plaintiff Mohammed Hamid Hasson Al-Falahi was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

352. Mr. Al-Falahi was detained on February 24, 2005, and held at Baghdad airport and Abu Ghraib prison.

353. Mr. Al-Falahi was beaten.

354. After nearly a year in prison, Mr. Al-Falahi was released without being charged with a crime.

355. Plaintiff Basheer Tuma Ameen was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

356. Mr. Ameen, a high school student at the time, was detained on May 2, 2004, and held at Al-Mazra'a military base and Abu Ghraib prison.

357. Mr. Ameen was beaten.

358. Mr. Ameen was forced into stress positions.

359. Mr. Ameen was deprived of food.

360. Mr. Ameen was subjected to sleep deprivation.

361. After over two years in prison, Mr. Ameen was released on May 23, 2006, without being charged with a crime.

362. Plaintiff Khaliss Lateef Tarrad was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

363. Mr. Tarrad was detained on August 13, 2006, and held at Al-Ijbala military base.

364. Mr. Tarrad was beaten.

365. Mr. Tarrad was burned with a cigarette on his left shoulder.

366. Mr. Tarrad was tied by his hands and feet and hung from the roof and beaten with a stick.

367. After fifteen months in prison, Mr. Tarrad was released on November 13, 2007, without being charged with a crime.

368. Plaintiff Ismael Himood Mahmoud Al-Falooji was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

369. Mr. Al-Falooji was detained on October 27, 2005, and held at Balad military base and Abu Ghraib prison.

370. Mr. Al-Falooji was beaten.

371. Mr. Al-Falooji was strangled until he lost consciousness.

372. Mr. Al-Falooji had two ribs broken by beatings, but was denied medical treatment.

373. After three months in prison, Mr. Al-Falooji was released on February 14, 2006, without being charged with a crime.

374. Plaintiff Mohammed Jasim Alwan Abdullah was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

375. Mr. Abdullah was detained on November 16, 2003, and held at Al-Lihoom military base, Susa prison and Abu Ghraib prison.

376. Mr. Abdullah was beaten.

377. After more than three years in prison, Mr. Abdullah was released on January 10, 2007, without being charged with a crime.

378. Plaintiff Hassan Ubaid Enad was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

379. Mr. Enad was detained on December 12, 2004, and held at Al-Lihoom military base, Susa prison and Abu Ghraib prison.

380. Mr. Enad was beaten.

381. After more than two years in prison, Mr. Enad was released on January 26, 2006, without being charged with a crime.

382. Plaintiff Raid Raa'ad Maraadh was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

383. Mr. Maraadh, a high school student at the time of his arrest, was detained on November 6, 2004, and held at Baghdad airport, Camp Bucca and Abu Ghraib prison.

384. Mr. Maraadh was beaten.

385. Mr. Maraadh was forced to watch his father and brother as they were tortured.

386. After fourteen months in prison, Mr. Maraadh was released on January 15, 2006, without being charged with a crime.

387. Plaintiff Luay Adib Jiwad was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

388. Mr. Jiwad was detained on December 27, 2004, and held at Abu Ghraib prison.

389. Mr. Jiwad was beaten.

390. After eight months in prison, Mr. Jiwad was released on August 27, 2005, without being charged with a crime.

391. Plaintiff Mohammed Munthir Hamad was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

392. Mr. Hamad was detained on November 20, 2004, and held at Al-Adhamia military base and Abu Ghraib prison.

393. While detained, Mr. Hamad was so badly beaten that he lost his eyesight.

394. Mr. Hamad was raped.

395. Mr. Hamad was sexually molested.

396. Mr. Hamad was beaten until bleeding from his head, nose and legs.

397. Mr. Hamad was subjected to electric shocks.

398. Mr. Hamad was subjected to sensory deprivation.

399. After two years in prison, Mr. Hamad was released on November 20, 2006, without being charged with a crime.

400. Plaintiff Sa'ad Hassan Alwan Al Juboori was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

401. Mr. Al Juboori was detained on September 28, 2003, and held at Abu Ghraib prison.

402. While detained, Mr. Al Juboori was denied a prisoner number and hidden from the International Committee of the Red Cross (“ICRC”).

403. Mr. Al Juboori was beaten.

404. Mr. Al Juboori was kept naked.

405. Mr. Al Juboori was threatened with dogs.

406. Mr. Al Juboori was shackled to his bars for long periods of time.

407. After thirteen months in prison, Mr. Al Juboori was released on October 7, 2004, without being charged with a crime.

408. Plaintiff Zaid Ahmed Ajaj was tortured and otherwise mistreated by L-3 and its co-conspirators while in custody, resulting in physical and mental harm.

409. Mr. Ajaj was detained on October 15, 2003, and held at Abu Ghraib prison.

410. Mr. Ajaj was beaten.

411. Mr. Ajaj was kept naked.

412. After nearly two and a half years in prison, Mr. Ajaj was released on February 17, 2006, without being charged with a crime.

THE TORTURE CONSPIRACY: ADEL NAKHLA

413. All of these harms were inflicted on Plaintiffs by L-3 employees and others conspiring with them.

414. Adel Nakhla, an L-3 employee, was one of the co-conspirators.

415. Military personnel and former prisoners have stated in sworn and unsworn testimony that Adel Nakhla, known also as "Abu Hamid," participated in the torture of prisoners during the night shift at Abu Ghraib.

416. Adel Nakhla was photographed participating in the torture of prisoners at Abu Ghraib.

417. Adel Nakhla confessed his involvement to some acts of torture and abuse to military investigators.

418. Adel Nakhla and other corporate employees instigated, directed, participated in, aided and abetted conduct towards prisoners that clearly violated the Geneva Conventions, the Army Field Manual, and the laws of the United States.

419. Adel Nakhla, acting in conspiracy with military personnel, forced prisoners into painful stress positions; stripped them naked; sexually humiliated and assaulted them; deprived them of sleep; subjected them to extreme temperatures; threatened them with dogs; and physically assaulted them.

420. Adel Nakhla made unlawful threats of violence to prisoners.

421. Adel Nakhla repeatedly conspired with others (including CACI employees) to torture prisoners.

422. Adel Nakhla expressed his intent to join the conspiracy both by verbal statements and by engaging in criminal conduct.

423. Adel Nakhla and his coconspirators 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 and customary international law.

THE TORTURE CONSPIRACY: L-3

424. L-3 also participated in the conspiracy to torture prisoners. L-3 verbally expressed its intent to join the conspiracy by making a series of statements to military personnel and others.

425. L-3's actions evidenced an intent to join the conspiracy, as the company knowingly and willfully permitted scores of its employees to participate in torturing and abusing prisoners over an extended period of time throughout Iraq.

426. For example, military investigations found:

- (a) L-3 agent John Israel to be a participant in the torture of prisoners at Abu Ghraib;
- (b) L-3 employee Etaf Mheisen conspired with CACI interrogator Daniel Johnson to torture prisoners;
- (c) L-3 employee "Iraqi Mike" assaulted a defenseless prisoner;

(d) an L-3 translator attempted to pry out the teeth of detainees using Leatherman pliers; and

(e) an L-3 translator had to be prevented from killing (by beating) a detainee in the head by a Special Forces soldier.

427. L-3 translators have admitted, at times under oath, to participating in interrogations where detainees were hit, kept in stress positions until they collapsed, made to do push-ups until they collapsed, kept awake for long periods, exposed to extreme temperatures and choked by the throat.

428. L-3 translators repeatedly bragged to L-3 management about how rough they were towards detainees.

429. L-3 permitted L-3 translators to translate – repeatedly -- illegal threats of death and rape.

430. L-3 permitted L-3 translators to ignore – repeatedly -- the military's instructions to abide by the Geneva Conventions and permitted L-3 translators to abuse and torture prisoners.

431. L-3 failed to take any effective action to prevent its employees from making threats, abusing and torturing prisoners.

432. L-3 willfully failed to report L-3 employees' repeated assaults and other criminal conduct by its employees to the United States or Iraqi authorities.

433. L-3 affirmatively hid the misconduct of its employees from the United States military.

434. L-3 discouraged its employees from reporting prisoner abuse to the United States authorities.

435. L-3 participated in the torture and abuse of prisoners throughout Iraq.

436. L-3 misconduct occurred at Camp Bucca, Baghdad International Airport, Camp Ashraf, and Mosul, as well as numerous smaller detention facilities located on Forward Operating Bases.

437. As of December 2003, L-3 deployed management at 28 sites in Iraq.

438. As of December 2003, L-3 deployed 3052 employees throughout the country.

439. At all times, L-3 management had the full and unfettered ability to prevent L-3 translators from abusing and torturing prisoners.

440. L-3 at all times was obliged by the terms of the contract to supervise its employees.

441. The United States military never prevented L-3 from supervising its employees.

442. The United States military contracted with L-3 to provide translators, not to provide thugs willing to engage repeatedly in hitting, punching, and kicking

prisoners, pouring cold water on them, forcing them into stress positions, slamming them into the walls, and threatening them.

443. L-3 is responsible for and complicit in the actions taken by its employees towards Mr. Al-Quraishi and the other Plaintiffs.

444. L-3's motivation was wholly financial- it made millions of dollars as a result of keeping quiet about and participating in the conspiracy to torture and mistreat the Plaintiffs and other prisoners.

DEFENDANTS AND THEIR CO-CONSPIRATORS TOOK STEPS TO COVER UP THE SCOPE AND EXTENT OF TORTURE

445. In addition to participating in the actual physical and mental abuse of Mr. Al-Quraishi and the other Plaintiffs, L-3 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 prisoners from the ICRC, and
- (d) misleading non-conspiring military and government officials about the state of affairs at the prisons.

**DEFENDANTS KNEW THAT THEIR TORTURE OF PRISONERS
VIOLATED THE LAWS OF THE UNITED STATES**

446. Adel Nakhla and L-3 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, Nakhla and L-3 confirmed and ratified the same.

447. Defendants knew that the conspiracy to torture would harm Mr. Al-Quraishi and the other Plaintiffs.

448. L-3 earned millions of dollars in revenues as a result of participating in the ongoing conspiracy.

449. L-3 invested the financial fruits of the conspiracy in their ongoing operations.

450. Nakhla and L-3 knew that military officials were prohibited from torturing prisoners by the Army Field Manual and other controlling law, and that any military officials who were doing so were violating the law.

451. Nakhla and L-3 knew that the United States government has denounced the use of torture and other cruel, inhuman or degrading treatment at all times. Nakhla and L-3 knew that it was illegal for them to participate in, instigate, direct, or aid and abet the torture of Mr. Al-Quraishi and other prisoners, including the Plaintiffs.

452. 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." US. Department of State: Initial Report of the United States of America to the UN 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.

453. Nakhla and L-3 knew that the ban on torture is absolute and no exigent circumstances permit the use of torture.

454. Nakhla and L-3 knew that the United States intended and required that any person acting under the contract to the United States would conduct themselves in accord with the relevant domestic and international laws.

455. Nakhla and L-3 knew and understood that the United States does not condone torture of prisoners.

456. Defendants cannot credibly claim that the wrongful and criminal conduct of certain military and government personnel misled them into thinking that the torture of prisoners was lawful and permissible.

L-3 ACTED NEGLIGENTLY

457. L-3 acted negligently and wrongfully by failing to prevent Adel Nakhla and other employees from engaging in foreseeable and predictable wrongful acts that harmed Mr. Al-Quraishi and the other Plaintiffs.

458. L-3 acted negligently and wrongfully by failing to discipline those who engaged in wrongful acts in Iraq.

459. L-3 acted negligently and wrongfully by failing to take due care in hiring employees being deployed to Iraq.

460. L-3 acted negligently and wrongfully by failing to train its employees.

461. L-3 acted negligently and wrongfully by failing to supervise adequately its employees. L-3 has admitted that it failed to supervise its employees.

462. L-3 acted negligently and wrongfully by failing to investigate and report accusations of wrongdoing committed and witnessed by its employees and agents.

463. L-3 profited financially from their negligent misconduct. The United States paid L-3 millions of dollars in exchange for their contractual promises to provide services in a lawful manner.

464. Instead of providing those services in a lawful manner, L-3 failed to ensure that their employees and agents abided by the contract terms and in accord with the Geneva Conventions.

465. Nakhla and L-3 injured Mr. Al-Quraishi and the other Plaintiffs and harmed the reputation of the United States throughout the world.

466. Mr. Al-Quraishi and the other Plaintiffs seeks compensatory and punitive damages in an amount far in excess of the jurisdictional amount set forth in 28 U.S.C. § 1332 (\$75,000).

467. Mr. Al-Quraishi and the other Plaintiffs seek any and all additional remedies (such as attorneys' fees) available under law.

COUNT ONE
TORTURE

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

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

470. 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, forced nudity, death threats, withholding of food, water and necessary medical care, and intentional exposure to extremes of heat and cold. The acts, done by Defendants working under contract with the United States, directly contradicted the United States' express policy against torture.

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

**COUNT TWO
CIVIL CONSPIRACY TO TORTURE**

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

473. Defendants agreed with each other and others to participate in a series of unlawful acts.

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

475. 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.

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

**COUNT THREE
AIDING AND ABETTING TORTURE**

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

478. Defendants knowingly and substantially assisted others in torturing Plaintiffs.

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

480. Defendants' substantial assistance caused grave and foreseeable damages to Plaintiffs.

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

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

482. 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.

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

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

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

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

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

487. Defendants and other co-conspirators agreed with each other and others to participate in a series of unlawful acts.

488. Defendants performed one or more overt acts pursuant to and in furtherance of the common scheme.

489. 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/or conspired with others to so treat Plaintiffs.

490. Defendants' knowing participation in the conspiracy caused grave and

foreseeable damages to Plaintiffs.

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

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

492. Defendants knowingly and substantially assisted others in treating Plaintiffs in a cruel, inhuman and degrading manner.

493. 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.

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

**COUNT SEVEN
WAR CRIMES**

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

496. 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.

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

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

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

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

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

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

502. Defendants agreed with each other and others to participate in a series of unlawful acts.

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

504. Defendants are liable for war crimes against Plaintiffs because they set the conditions, directly and indirectly facilitated, ordered, acquiesced,

confirmed, ratified and/or conspired with others to commit war crimes against Plaintiffs.

505. Defendants' knowing participation in the conspiracy caused grave and foreseeable damage to Plaintiffs.

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

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

507. Defendants knowingly and substantially assisted others in committing war crimes against Plaintiffs.

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

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

**COUNT TEN
ASSAULT AND BATTERY**

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

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

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

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

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

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

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

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

517. Defendants agreed with each other and others to participate in a series of unlawful acts.

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

519. Defendants are liable for the assaults and batteries against Plaintiffs because they because they set the conditions, directly and indirectly facilitated,

ordered, acquiesced, confirmed, ratified and/or conspired with others to commit the assaults and batteries.

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

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

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

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

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

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

**COUNT THIRTEEN
SEXUAL ASSAULT AND BATTERY**

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

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

527. 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 Plaintiffs intimate parts.

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

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

530. Defendants' act caused grave and foreseeable damages to Plaintiffs.

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

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

532. Defendants agreed with each other and others to participate in a series of unlawful acts.

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

534. Defendants are liable for the sexual assaults and batteries against Plaintiffs because they because they set the conditions, directly and indirectly

facilitated, ordered, acquiesced, confirmed, ratified and/or conspired with others to sexually assault and batter Plaintiffs.

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

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

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

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

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

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

**COUNT SIXTEEN
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

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

541. 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.

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

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

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

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

545. Defendants agreed with each other and others to participate in a series of unlawful acts.

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

547. Defendants are liable for intentional infliction of emotional distress on Plaintiff because they because they set the conditions, directly and indirectly

facilitated, ordered, acquiesced, confirmed, ratified and/or conspired with others to inflict emotional distress on Plaintiffs.

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

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

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

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

551. 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.

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

**COUNT NINETEEN – AGAINST THE CORPORATE DEFENDANT
NEGLIGENT HIRING AND SUPERVISION**

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

554. 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 conformity with the law;
- (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.

555. The negligence of Defendants directly and foreseeably harmed Plaintiffs.

**COUNT TWENTY –
AGAINST THE CORPORATE DEFENDANT
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

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

557. Defendants negligently inflicted severe emotional distress on Plaintiffs.

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

559. The negligence of L-3 directly and foreseeably harmed Plaintiffs.

JURY DEMAND AND PRAYER FOR DAMAGES

560. Plaintiffs seek a jury trial. Plaintiffs are entitled to any and all remedies available to them 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
- (c) any attorneys' fees and costs permitted by law.

Date: October 1, 2008



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