

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND, GREENBELT DIVISION**

WISSAM ABDULLATEFF)

SA'EED AL-QURAISHI)

Amman, Jordan)

Plaintiff)

v.)

ADEL NAKHLA)

9324 Frostburg Way,)

Montgomery Village, MD 20886)

Montgomery County)

L-3 SERVICES, INC.)

1320 Braddock Place)

Alexandria, VA 22314)

**COMPLAINT AND JURY TRIAL
DEMAND**

CACI INTERNATIONAL INC.)

North Glebe Road)

Arlington, Virginia 22201)

CACI PREMIER)

TECHNOLOGY, INC.)

1100 North Glebe Road,)

Arlington, Virginia 22201)

Defendants.)

COMPLAINT

1. Wissam Abdullateff Sa'eed Al-Quraishi, a 37-year old father of three, was imprisoned and tortured. He brings this tort action against those who tortured, and

conspired with others to torture, him: Adel Nakhla, a resident of this District, CACI International Inc., and L-3 Services (formerly Titan Corporation), both publicly-traded corporations 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).

4. Plaintiff Wissam Abdullateff Sa'eed Al-Quraishi is a 37-year old Iraqi now living in Amman, Jordan. He is married, with three children. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

5. Defendant Adel Nakhla is an individual residing at 9324 Frostburg Way, Montgomery Village, Maryland, 20886.

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.

9. Defendant CACI International Inc. is a publicly-traded Delaware corporation with headquarters located at 1100 North Glebe Road, Arlington, Virginia 22201. 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 millions of dollars from the United States in exchange for providing the United States Army with services, including interrogation services.

**THE TORTURE OF WISSAM ABDULLATEFF
SA'EED AL-QURAIISHI**

11. Mr. Al-Quraishi was repeatedly and gravely tortured at Abu Ghraib prison and other locations.

12. Mr. Al-Quraishi was arrested on or about November 1, 2003. During his arrest, an L-3 employee slapped and beat Mr. Al-Quraishi.

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

14. During this initial seven-day period of interrogations, Mr. Al-Quraishi was

hit, kicked, and subjected to electrical shocks. He was also subjected to mock executions by having a gun aimed at his head, and the trigger pulled. Each time this happened, Mr. Al-Quraishi thought he was being executed.

15. Mr. Al-Quraishi was sent to the “hard site” at the Abu Ghraib prison on or about November 12, 2003.

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

17. Mr. Al-Quraishi was hung on the bars of his cell for extended periods of time.

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

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

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

21. 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.

22. 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.

THE TORTURE CONSPIRACY

23. Adel Nakhla, other L-3 employees, and CACI employees conspired with certain military personnel to torture prisoners kept at the Abu Ghraib hard site.

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

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

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

27. 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.

28. 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.

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

30. Adel Nakhla repeatedly conspired with certain military personnel to torture Mr. Al-Quraishi.

31. The acts of Adel Nakhla and other L-3 employees constitute acts of L-3. L-3 conveyed its intent to join 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.

32. 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 Mr. Al-Quraishi and other prisoners.

33. Adel Nakhla was not the only corporate employee who tortured Mr. Al-Quraishi and other prisoners at Abu Ghraib. CACI interrogators physically participated in the torture of hard site prisoners, and ordered military personnel to torture hard site victims.

34. The acts of CACI interrogators constitute acts of CACI. CACI conveyed its intent to join 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.

**L-3 AND CACI COULD HAVE PREVENTED AND STOPPED
THEIR EMPLOYEES FROM TORTURING MR. AL-QURAISHI**

35. Adel Nakhla worked for L-3, as did the other translators who harmed Mr. Al-Quraishi.

36. L-3 had the ability to control, direct and influence the actions taken by their employees who directly participated in the torture of prisoners. L-3 had the ability and the contractual duty to prevent Nakhla and the other translators from torturing prisoners.

37. CACI interrogators worked for CACI Premier Technology. 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. 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.

38. CACI has admitted that it had the ability to control, direct and influence the actions performed by their employees. CACI had the ability to prevent their employees from torturing Mr. Al-Quraishi.

39. CACI and L-3 at all times were obliged by the terms of the contract to supervise their employees.

40. CACI and L-3 at all times retained the ability to stop Nakhla and other employees from torturing Mr. Al-Quraishi.

41. CACI and L-3 are responsible for the actions taken by their employees towards Mr. Al-Quraishi.

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

42. To date, the “investigations” of the events at Abu Ghraib have failed to include the fundamental step of interviewing the hard site victims.

43. In addition to participating in the actual physical and mental abuse of Mr. Al-Quraishi, Adel Nakhla, other L-3 employees, and CACI employees 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 International Committee of the Red Cross (“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

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

45. Defendants knew that the conspiracy to torture would harm Mr. Al-Quraishi.

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

47. CACI and L-3 invested the financial fruits of the conspiracy in their ongoing operations.

48. Nakhla, CACI, 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.

49. Nakhla, CACI, 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, CACI 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.

50. 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.

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

52. Nakhla, L-3, and CACI 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.

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

54. 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.

THE CORPORATE DEFENDANTS ACTED NEGLIGENTLY

55. L-3 acted negligently and wrongfully by failing to prevent Adel Nakhla and other employees assigned to Iraqi detention centers from engaging in foreseeable and predictable wrongful acts that harmed Mr. Al-Quraishi.

56. CACI acted negligently and wrongfully by failing to prevent its employees from engaging in foreseeable and predictable wrongful acts that harmed Mr. Al-Quraishi.

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

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

59. L-3 and CACI acted negligently and wrongfully by failing to train their employees.

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

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

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

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

64. Nakhla, L-3 and CACI injured Mr. Al-Quraishi and harmed the reputation of the United States throughout the world.

65. Mr. Al-Quraishi 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).

66. Mr. Al-Quraishi seeks any and all additional remedies (such as attorneys' fees) available under law.

COUNT ONE TORTURE

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

93. Defendants' acts and omissions were deliberate and intentional. Defendants acted purposefully to punish, intimidate, discriminate and to obtain information from Mr. Al-Quraishi, who was in their physical custody and control.

94. The acts committed by Defendants and their agents constitute torture in violation of the law of nations. The acts of torture committed against Mr. Al-Quraishi 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 domestic law and the United States' express policy against torture.

95. Defendants' misconduct caused grave and foreseeable injuries to Mr. Al-Quraishi.

**COUNT TWO
CIVIL CONSPIRACY TO TORTURE**

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

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

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

99. Defendants are liable for torture because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to torture Mr. Al-Qurasishi.

100. Defendants' knowing participation in the conspiracy caused grave and foreseeable damages to Mr. Al-Quraishi.

**COUNT THREE
AIDING AND ABETTING TORTURE**

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

102. Defendants knowingly and substantially assisted others in torturing Mr. Al-Quraishi.

103. Defendants are liable for the torture because they aided and abetted others who were torturing Mr. Al-Quraishi.

104. Defendants' substantial assistance caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

106. The acts described herein had the intent and the effect of causing serious mental and physical pain and suffering to Mr. Al-Quraishi, grossly humiliating and debasing Mr. Al-Quraishi, and forcing him to act against his will and conscience, inciting fear and anguish and breaking his physical or moral resistance.

107. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to subject Mr. Al-Quraishi to cruel, inhuman or degrading treatment.

108. Defendants are liable for their conduct that led to the cruel, inhuman and degrading treatment of Mr. Al-Quraishi.

109. Defendants' misconduct caused grave and foreseeable injuries to Mr. Al-Quraishi.

**COUNT FIVE
CIVIL CONSPIRACY TO TREAT MR. AL-QURAISHI IN
A CRUEL, INHUMAN OR DEGRADING MANNER**

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

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

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

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

114. Defendants' knowing participation in the conspiracy caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

116. Defendants knowingly and substantially assisted others in treating Mr. Al-Quraishi in a cruel, inhuman and degrading manner.

117. Defendants are liable for the injuries caused by the cruel, inhuman and degrading treatment because they substantially aided and abetted others in so treating Mr. Al-Quraishi.

118. Defendants' knowing and substantial assistance to others caused grave and foreseeable damages to Mr. Al-Quraishi.

**COUNT SEVEN
WAR CRIMES**

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

120. 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 Mr. Al-Quraishi.

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

122. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to commit war crimes against Mr. Al-Quraishi.

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

124. Defendants' misconduct caused grave and foreseeable injuries to Mr. Al-Quraishi.

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

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

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

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

128. Defendants are liable for war crimes against Mr. Al-Quraishi because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to commit war crimes against Mr. Al-Quraishi.

129. Defendants' knowing participation in the conspiracy caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

131. Defendants knowingly and substantially assisted others in committing war crimes against Mr. Al-Quraishi.

132. Defendants are liable for the injuries caused by the war crimes because they substantially aided and abetted others in committing war crimes against Mr. Al-Quraishi.

133. Defendants' knowing and substantial assistance to others in the commission of war crimes caused grave and foreseeable damages to Mr. Al-Quraishi.

**COUNT TEN
ASSAULT AND BATTERY**

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

135. Defendants unlawfully intended to and did inflict immediate injury upon Mr. Al-Quraishi.

136. Defendants intentionally assaulted, battered and made other offensive contacts; and aided and abetted the assault and battery, and offensive contacting, of Mr. Al-Quraishi.

137. Mr. Al-Quraishi did not consent to the offensive contacts. Mr. Al-Quraishi feared his personal safety and felt threatened by Defendants' actions.

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

139. Defendants' acts caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

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

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

143. Defendants are liable for the assaults and batteries against Mr. Al-Quraishi because they set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to commit the assaults and batteries.

144. Defendants' knowing participation in the conspiracy to assault and batter caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

146. Defendants knowingly and substantially assisted others in assaulting and battering Mr. Al-Quraishi.

147. Defendants are liable for the injuries caused because they substantially aided and abetted others in assaulting and battering Mr. Al-Quraishi.

148. Defendants' knowing and substantial assistance to others caused grave and foreseeable damage to Mr. Al-Quraishi.

**COUNT THIRTEEN
SEXUAL ASSAULT AND BATTERY**

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

150. Mr. Al-Quraishi was sexually assaulted and battered by Defendants and their co-conspirators.

151. Defendants intended to, and did, cause offensive sexual contacts with intimate parts of Mr. Al-Quraishi. Defendants acted to cause Mr. Al-Quraishi imminent apprehension of harmful and offensive contact with his intimate parts.

152. Mr. Al-Quraishi did not consent to the contacts. Mr. Al-Quraishi feared for his personal safety and felt threatened by Defendants' actions.

153. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to sexually assault and batter Mr. Al-Quraishi.

154. Defendants' acts caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

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

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

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

159. Defendants' knowing participation in the conspiracy caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

161. Defendants knowingly and substantially assisted others in sexually assaulting Mr. Al-Quraishi.

162. Defendants are liable for the injuries caused by the crimes because they substantially aided and abetted others in sexually assaulting and battering Mr. Al-Quraishi.

163. Defendants' knowing and substantial assistance to others caused grave and foreseeable damages to Mr. Al-Quraishi.

COUNT SIXTEEN
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

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

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

166. Defendants set the conditions, directly and indirectly facilitated, ordered, acquiesced, confirmed, ratified and conspired with others to inflict emotional distress on Mr. Al-Quraishi.

167. Defendants' acts caused grave and foreseeable injuries to Mr. Al-Quraishi.

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

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

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

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

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

172. Defendants' knowing participation in the conspiracy to inflict intentionally emotional distress caused grave and foreseeable damages to Mr. Al-Quraishi.

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

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

174. Defendants knowingly and substantially assisted others in intentionally inflicting emotional distress upon Mr. Al-Quraishi.

175. 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 Mr. Al-Quraishi.

176. Defendants' knowing and substantial assistance to others caused grave and foreseeable damages to Mr. Al-Quraishi.

**COUNT NINETEEN
(AGAINST THE CORPORATE DEFENDANTS)
NEGLIGENT HIRING AND SUPERVISION**

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

178. Defendants acted negligently and directly harmed Mr. Al-Quraishi 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 properly screen personnel before their hiring;
- (c) failing to properly train personnel or subsidiary personnel 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.

179. The negligence of L-3 and CACI directly and foreseeably harmed Mr. Al-Quraishi.

**COUNT TWENTY
(AGAINST THE CORPORATE DEFENDANTS)
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

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

181. Defendants negligently inflicted severe emotional distress on Mr. Al-Quraishi.

182. Defendants had a duty to Mr. Al-Quraishi, which they breached.

183. The negligence of L-3 and CACI directly and foreseeably harmed Mr. Al-Quraishi.

JURY DEMAND AND PRAYER FOR DAMAGES

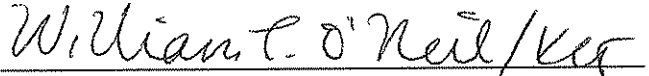
67. Mr. Al-Quraishi seeks a jury trial. Mr. Al-Quraishi is entitled to any and all remedies available to him as a result of the conduct alleged herein, including, but not limited to:

- (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.

Date: June 30, 2008


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