

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

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 :
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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 :
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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 :
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NAZAR TAHA KAHTAN :
Baghdad, Iraq :
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MOHAMMED QASIM :
MOHAMAD :
Baghdad, Iraq :
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ABDULQADIR MUTHANA :
ABDULWAHAB :
Baghdad, Iraq :
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ABDULAH JAWAD :
KADHUM AL-MUHAMADI :
Baghdad, Iraq :
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MOUSA ABDULWAHID :
Baghdad, Iraq :
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AHMED MAHDI SALIH :
Baghdad, Iraq :
 :
IBRAHEEM JAWAD :
AL- MUHAMADI :
Baghdad, Iraq :
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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 :
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OMER JAMEEL THALIJ :
AL-ZUBAEI :
Baghdad, Iraq :
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ALI MUHSIN ALI :
Baghdad, Iraq :
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TALIB IBRAHEEM :
HAMDAN AL-ZUBAEI :
Baghdad, Iraq :
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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 :
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ABDULKAREEM UDA :

SHIKIR AL-ZUBAEI :
Baghdad, Iraq :
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RA'AD AHMED HASSOON :
AL-FALAHY :
Baghdad, Iraq :
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MOHAMMED HAMID :
HASSON AL-FALAHY :
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 :
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MOHAMMED JASIM ALWAN :
ABDULLAH :
Baghdad, Iraq :
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HASSAN UBAID ENAD :
Baghdad, Iraq :
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SADIQ SATTORI KHAZA'AL :
Baghdad, Iraq :
:
SHIHAB AHMED DAFFAR :
AL-SAYDI :
Baghdad, Iraq :
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RAID RAA'AD MARAADH :
Baghdad, Iraq :
:
LUAY ADIB JIWAD :

Baghdad, Iraq :
: :
MOHAMMED MUNTHIR HAMAD :
Baghdad, Iraq :
: :
Plaintiffs, :
: :
v. :
: :
ADEL NAKHLA :
 :
: :
L-3 SERVICES, INC. :
1320 Braddock Place :
Alexandria, VA 22314 :
: :
Defendants :

FIRST 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. 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. Plaintiff Waleed Ubaid Dawood Salman is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

6. Plaintiff Uday Fadhil Shiweji Mutlaq Al Mamori is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

7. Plaintiff Adnan Fadhil Muhee Al-Niamey is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

8. Plaintiff Ahmed Fakhri Za'al Kareem is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

9. Plaintiff Sarhan Abdulah Za'al Kareem is a 47 year old Iraqi living in Baghdad, Iraq. He is married with eight children. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

10. Plaintiff Ghazwan Jasim Mohammed Al Ghreri is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

11. Plaintiff Sudad Ali Hameed Al Ogaidi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

12. Plaintiff Ali Abdullah Suaihil Salman Al Janabi is a 46 year old Iraqi living in Baghdad, Iraq. He is married with six children. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

13. Plaintiff Amir Mohammed Ibraheem Al Ogaidi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

14. Plaintiff Ahmed Salman Abdulhameed Al Alosi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

15. Plaintiff Mohammed Taha Himoud Al Majma'ae is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

16. Plaintiff Mohammed Salih Ibraheem Dhahir is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

17. Plaintiff Hadi Ahmed Slebi Al-Hamadani is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

18. Plaintiff Ismail Turkey Moutar Dirweesh is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

19. Plaintiff Yasseen Abid Mahmoud Al Mashhadani is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

20. Plaintiff Ahmed Dhia Abdulah Ali Al Mahdawi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

21. Plaintiff Mohammed Rekan Aggab Al- Fahdawi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

22. Plaintiff Shihab Ahmed Daffar Al-Saidi is a 33 year old Iraqi living in Baghdad, Iraq. He is married with three children. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

23. Plaintiff Sadiq Sattori Khaza'al is a 43 year old Iraqi living in Baghdad, Iraq. He is married with four children. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

24. Plaintiff Rafe'a Abbas Ali Mutar Al-Obaidi is a 44 year old Iraqi living in Baghdad, Iraq. He is married with five children. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

25. Plaintiff Emad Khudhayir Shahuthh Al-Janabi is a 43 year old Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

26. Plaintiff Sa'adoon Ali Hameed Al-Ogaidi is a 36 year old Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

27. Plaintiff Mohammed Abdwihed Towfek Al-Taee is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

28. Plaintiff Emad Ubaid Hamad Al- Badrani is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

29. Plaintiff Husham Haloob Mutar Al-Alwani is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

30. Plaintiff Emad Qasim Mohammed Al-Halbosi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

31. Plaintiff Munsir Talal Sameer Al-Fahdawi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

32. Plaintiff Qasim Mohammed Abdullah is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

33. Plaintiff Majid Jassim Humadi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

34. Plaintiff Nazar Taha Kahtan is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

35. Plaintiff Mohammed Qasim Mohamad is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

36. Plaintiff Abdulqadir Muthana Abdulwahab is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

37. Plaintiff Abdulah Jawad Kadhum Al-Muhamadi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

38. Plaintiff Mousa Abdulwahid is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

39. Plaintiff Ahmed Mahdi Salih is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

40. Plaintiff Ibraheem Jawad Kadhum Al- Muhamadi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

41. Plaintiff Ibraheem Tawfeeq Shafi Hussein is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

42. Plaintiff Safialdeen Ahmed Farhan Al Jumaili is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

43. Plaintiff Dhiaaldeen Ahmed Farhan is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

44. Plaintiff Tawfeeq Shafi Hussein Al-Hashimi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

45. Plaintiff Bahaaldeen Ahmed Farhan is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

46. Plaintiff Qais Kamel Humadi Salih is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

47. Plaintiff Murtadha Mohammed Saed is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

48. Plaintiff Sameer Naseer Yassen is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

49. Plaintiff Ala'a Ahmed Salih Al Fahdawi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

50. Plaintiff Faiz Ahmed Salih Al Fahdawi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

51. Plaintiff Adnan Talab Abid Salih Al Zubaei is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

52. Plaintiff Jabbar Kamil Farhan Al Timeemi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

53. Plaintiff Bilal Ali Hamid Al-Zubai is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

54. Plaintiff Nema'a Ahmed Ali Jasim is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

55. Plaintiff Omer Jameel Thalij Al-Zubaei is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

56. Plaintiff Ali Muhsin Ali is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

57. Plaintiff Talib Ibraheem Hamdan Al-Zubaei is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

58. Plaintiff Marwan Hashim Ali Al-Sa'adoon is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

59. Plaintiff Muheeb Reshan Al-Obaidi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

60. Plaintiff Mudhir Abdullah Hamadi Al-Dulaimi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

61. Plaintiff Sabah Daham Rasheed Al-Dulaimi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

62. Plaintiff Falih Ahmed Hamdan Al-Zubaei is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

63. Plaintiff Abdulkareem Uda Shikir Al-Zubaei is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

64. Plaintiff Ra'ad Ahmed Hassoon Al-Falahi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

65. Plaintiff Mohammed Hamid Hasson Al-Falahi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

66. Plaintiff Basheer Tuma Ameen is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

67. Plaintiff Khaliss Lateef Tarrad is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

68. Plaintiff Ismael Himood Mahmoud Al-Falooji is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

69. Plaintiff Mohammed Jasim Alwan Abdullah is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

70. Plaintiff Hassan Ubaid Enad is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

71. Plaintiff Sadiq Sattori Khaza'al is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

72. Plaintiff Shihab Ahmed Daffar Al-Saidi is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

73. Plaintiff Raid Raa'ad Maraadh is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

74. Plaintiff Luay Adib Jiwad is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

75. Plaintiff Mohammed Munthir Hamad is an Iraqi living in Baghdad, Iraq. He is an innocent Iraqi who was badly tortured by defendants and their co-conspirators.

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

[REDACTED].

77. 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.

78. 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.

79. 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 OF WISSAM ABDULLATEFF
SA'EED AL-QURAISHI**

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

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

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

83. 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.

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

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

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

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

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

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

90. L-3 employee Ade1 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.

91. 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 OF EMAD KHUDAYIR SHAHUTH AL-JANABI

92. Mr. Al-Janabi was repeatedly and gravely tortured at Abu Ghraib prison.

93. The events began on or about two in the morning on September 20, 2003, when persons dressed in American military uniforms and civilian clothing raided Mr. Al-Janabi's home. They began to beat Mr. Al-Janabi, his brother and his nephew. These beatings occurred in front of Mr. Al-Janabi's wife and children.

94. Along with his brother and nephew, Mr. Al-Janabi was forced from his house. His captors did not permit him to dress, instead forcing him to go out wearing nothing but his shorts. His captors placed a hood over his head, poured cold water on him, and forced him to kneel in the back of a vehicle.

95. They took Mr. Al-Janabi to a military base, and forced him into a wooden crate. There, with the hood still over his head, they interrogated him. During the interrogation, the interrogator stuck his hand inside the hood, and 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.

96. After this torture, three persons began to slam Mr. Al-Janabi into a wall until he became unconscious.

97. After Mr. Al-Janabi regained consciousness, he 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. Mr. Al-Janabi then heard two gunshots fired

immediately next to him. Believing his brother and nephew to have been executed, and believing himself to be the next one to be executed, he began to say the al shahada, the Islamic prayer said immediately before death.

98. As he lay on the ground hooded and fearing imminent execution, a helicopter hovered immediately above him. An L-3 translator threatened Mr. Al-Janabi, stating that he had to provide information or he would be crushed by the helicopter. Mr. Al-Janabi could hear other victims screaming for mercy.

99. After the helicopter left, Mr. Al-Janabi heard a mechanized vehicle. The same L-3 translator threatened Mr. Al-Janabi again, stating that a tank was going to run over him.

100. Thereafter, Mr. Al-Janabi was taken to a building. He 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.

101. When Mr. Al-Janabi regained consciousness, he was brought to an interrogation room. In the room, there was an interrogator and an L-3 translator. The interrogator, through the L-3 translator, said “welcome to Guantanamo.” The interrogator told Mr. Al-Janabi that he had been sentenced to execution. The

interrogator told Mr. Al-Janabi that if he cooperated, then his wife would not be brought to the prison and his family would be given a stipend after his execution.

102. After many hours of interrogation, Mr. Al-Janabi was placed in a cell now known to be in the section of the Abu Ghraib prison called the “hard site.”

103. On or about October 2, 2003, the International Committee of the Red Cross (“ICRC”) conducted a surprise inspection and found Mr. Al-Janabi in the hard site cell, naked and cuffed. The ICRC worker observed the bruises from the beatings, and told Mr. Al-Janabi that he was in the Abu Ghraib prison, not Guantanamo. She told Mr. Al-Janabi that he did not have a prisoner number, and that he was in grave danger as a result. She said that he could have been killed if she had not found him, and she gave him an ICRC number on a card. She also had Mr. Al-Janabi write a letter to his family, which was eventually delivered to them five months later.

104. After this initial visit from the ICRC, Mr. Al-Janabi never again was permitted to see the ICRC. Mr. Al-Janabi’s ICRC card was taken away from him, and the torture continued. Whenever a ICRC visit was scheduled, he and other prisoners were taken out of their cells, chained together, hooded, and hidden away in another part of the prison.

105. Mr. Al-Janabi was kept naked and hand-cuffed in his cell.

106. Mr. Al-Janabi was repeatedly chained in painful positions.

107. 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.

108. On one occasion, 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.

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

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

111. Mr. Al-Janabi was repeatedly punched and slammed into walls.

112. Mr. Al-Janabi was struck with a baton-like instrument and beaten.

113. Mr. Al-Janabi was deprived of food.

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

115. Mr. Al-Janabi was subjected to unbearably loud music for extended periods of time.

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

117. Mr. Al-Janabi was subjected to sensory deprivation.

118. 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.

119. 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.

THE TORTURE OF SA'ADOON ALI HAMEED AL-OGAIDI

120. Mr. Sa'adoon Ali Hameed Al-Ogaidi is married with four children. On or about September 29, 2003, Mr. Al-Ogaidi was forcibly detained during a raid on his home in the middle of the night.

121. Mr. Al-Ogaidi was beaten by the L-3 translator participating in the raid. Mr. Al-Ogaidi was then hooded, cuffed, taken from his home in only his nightclothes, and forced onto the floor of a Hummer.

122. After a period of time being driven, Mr. Al-Ogaidi was pulled from the Hummer and placed in a cage intended for animals. 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.

123. Mr. Ogaidi was transferred from the cage to the Abu Ghraib hard site. Mr. Al-Ogaidi was not given a prison number upon arrival at Abu Ghraib, but instead as illegally treated as a "ghost detainee."

124. Shortly after his transfer to Abu Ghraib, Mr. Al-Ogaidi was threatened with death. As a co-conspirator put a gun to his head, the L-3 translator stated in Arabic, "I am going to kill you."

125. 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.

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

127. Mr. Al-Ogaidi was handcuffed through the bars to another prisoner. This was done to prevent either from sleeping because if either man fell asleep, their arms would be pulled, causing such great pain that the other prisoner would be forced to wake them. During this torture, the other prisoner lost consciousness on occasion, causing Mr. Ogaidi tremendous pain.

128. 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.

129. Approximately one month after Mr Al-Ogaidi was imprisoned at Abu Ghraib, he received a visit from the ICRC. After learning that Mr. Al-Ogaidi did not have a prison number, the ICRC representative promised to send a letter to his family, and ensure that he was given a number.

130. On the day after Mr. Al-Ogaidi was interviewed by the ICRC, he and the other “ghost detainees” were taken out of their cells, hooded, and shackled

together in a chain at the neck, waist and feet. Mr. Al-Ogaidi and the other ghost detainees were dragged by the chain to another room, and kept there chained together, without being permitted to relieve themselves. Mr. Al-Ogaidi later learned that they had all been hidden from the ICRC, which had visited the prison again. The ICRC visits resulted in Mr. Al-Ogaidi being given a number.

131. 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.

THE TORTURE OF MOHAMMED ABDWIHED TOWFEK AL-TAE

132. Mr. Al-Tae, a 39 year old taxi driver, was repeatedly and gravely tortured during his imprisonment in American-controlled prisons.

133. On or about August 21, 2003, Mr. Al-Tae picked up a customer in his taxi, and drove him home. The customer invited him into his home. Mr. Al-Tae accepted his offer of hospitality. As he sat resting in his customer's home, he was detained by American forces. Mr. Al-Tae learned later that day that he likely was the victim of the American practice of paying money to Iraqis for "tips."

134. During his detention at numerous sites, including Abu Ghraib, Mr. Al-Tae was horrifically abused by L-3 translators and their co-conspirators. Mr. Al-Tae was forced to consume so much water that he began to vomit blood. After having vomited several times, Mr. Al-Tae fainted. After he regained consciousness, the abuse continued. The translator and his co-conspirators tied a

plastic line tight around Mr. Al-Tae's penis and forced him to consume even more liquid. This forced consumption of liquids, combined with the forcible prevention or urination, almost killed Mr. Al-Tae.

135. Mr. Al-Tae was struck and beaten with metal instruments.

136. Mr. Al-Tae was deprived of food.

137. Mr. Al-Tae was deprived of sleep for extended periods of time.

138. Mr. Al-Tae was placed in painful stress positions for extended periods of time.

139. Mr. Al-Tae was threatened with death.

140. Mr. Al-Tae was suffocated with a hood.

141. Mr. Al-Tae was forced to engage in physical activity to the point of exhaustion.

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

THE TORTURE OF THE OTHER PLAINTIFFS

143. 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.

144. 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.

145. 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.

146. 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.

147. 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.

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

149. 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.

150. 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.

151. 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.

152. 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.

153. 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.

154. 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.

155. 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.

156. 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.

157. 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.

158. 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.

159. 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.

160. 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.

161. 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.

162. 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.

163. 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.

164. 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.

165. 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.

166. 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.

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

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

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

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

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

172. 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.

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

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

175. Ibraheem 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.

176. 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.

177. 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.

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

179. 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.

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

181. 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.

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

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

184. 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.

185. 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.

186. 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.

187. 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.

188. 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.

189. 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.

190. 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.

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

192. 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.

193. 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.

194. 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.

195. 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.

196. 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.

197. 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.

198. 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.

199. 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.

200. 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.

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

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

203. 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.

204. 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.

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

206. 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.

207. 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.

208. 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.

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

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

THE TORTURE CONSPIRACY

211. Adel Nakhla, other L-3 employees, and CACI employees (another American defense contractor) conspired with certain military personnel to torture prisoners kept at the Abu Ghraib hard site.

212. 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.

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

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

215. 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.

216. 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.

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

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

219. The acts of Adel Nakhla and other L-3 employees constitute acts of L-3. L3 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.

220. 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, other Plaintiffs and other prisoners.

221. 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.

L-3 COULD HAVE PREVENTED AND STOPPED THEIR EMPLOYEES FROM TORTURING MR. AL-QURAISHI AND THE OTHER PLAINTIFFS

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

223. 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.

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

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

226. L-3 is responsible for the actions taken by its employees towards Mr. Al-Quraishi and the other plaintiffs.

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

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

228. In addition to participating in the actual physical and mental abuse of Mr. Al-Quraishi and the other plaintiffs, Adel Nakhla and other L-3 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 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

229. 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.

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

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

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

233. 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.

234. 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.

235. 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.

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

237. 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.

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

239. 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

240. 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 and the other plaintiffs.

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

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

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

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

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

246. 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.

247. 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.

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

249. 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).

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

COUNT ONE
TORTURE

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

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

253. 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.

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

**COUNT TWO
CIVIL CONSPIRACY TO TORTURE**

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

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

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

258. 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.

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

**COUNT THREE
AIDING AND ABETTING TORTURE**

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

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

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

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

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

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

265. 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.

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

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

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

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

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

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

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

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

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

foreseeable damages to Plaintiffs.

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

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

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

276. 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.

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

**COUNT SEVEN
WAR CRIMES**

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

279. 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

292. 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**

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

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

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

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

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

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

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

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

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

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

302. 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 conspired with others to commit the assaults and batteries.

303. 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**

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

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

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

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

**COUNT THIRTEEN
SEXUAL ASSAULT AND BATTERY**

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

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

310. 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**COUNT SIXTEEN
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

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

324. 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.

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

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

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

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

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

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

330. 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 conspired with others to inflict emotional distress on Plaintiffs.

331. 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**

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

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

334. 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.

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

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

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

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

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

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

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

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

340. Defendants negligently inflicted severe emotional distress on Plaintiffs.

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

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

JURY DEMAND AND PRAYER FOR DAMAGES

343. 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.

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