UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

SUHAIL NAJIM ABDULLAH AL SHIMARI, *et al.*, Plaintiffs, v. CACI PREMIER TECHNOLOGY, INC., Defendant,	)	No. 1:08-cv-0827 LMB-JFA

DEFENDANT CACI PREMIER TECHNOLOGY, INC.'S REPLY IN SUPPORT OF ITS MOTION *IN LIMINE* TO ADMIT EVIDENCE REGARDING OTHER CIVILIAN INTERROGATORS AT ABU GHRAIB PRISON

I. INTRODUCTION

Over CACI's[1] consistent objections, the Court has allowed Plaintiffs to pursue the "shaky" conspiracy theory that CACI interrogators "created the environment in which some other people" abused Plaintiffs.[2] Forced to litigate this questionable theory of liability, CACI seeks to present a defense (supported by Plaintiffs' own exhibits) that, if anyone, interrogators from other government agencies – *not CACI interrogators* – created the abusive environment at

[1] CACI Premier Technology, Inc., will be called "CACI" for purposes of this motion.

[2] Dkt. #1625 at 144:13-23 (emphasis added):

> THE COURT: . . . The theory that I've allowed to go – and I think it's ***a shaky theory***, but, you know, I'm allowing it to go forward – is that by – if the plaintiffs are correct that CACI staff encouraged or directed military police to rough up, soften up the detainees, ***they created the environment in which some other people, other actors, did, in fact, rough up the plaintiffs***. And if there's enough evidence that supports the conclusion that CACI knowingly and intentionally, you know, got involved in this and that headquarters was sufficiently complicit, then the plaintiffs may prevail.

Abu Ghraib. *See* Dkt. #1675. Plaintiffs' opposition to this evidence is a case study in hypocrisy that demonstrates beyond all doubt that their "shaky" conspiracy theory is utterly incoherent.

Plaintiffs argue that CACI should not be permitted to introduce evidence of OGA interrogators' influence over military police or acts of abuse at trial because, Plaintiffs say, they are "wholly unconnected to Plaintiffs." Dkt. #1707 at 2. Because there is no direct evidence that OGA interrogators questioned them, Plaintiffs urge that evidence regarding OGA interrogators is irrelevant. *Id.* at 2-3. Perhaps Plaintiffs do not perceive the irony of their argument or the fact that they are parroting CACI's longstanding argument that ***evidence about interrogators who are not connected to Plaintiffs is irrelevant***.

Of course, when it comes to proving *their* case, Plaintiffs' standards are much more flexible. As Plaintiffs succinctly explained to the Court:

> [O]ur position has always been that ***level of connection is legally irrelevant***. We've long abandoned a direct liability theory. This is a conspiracy case, and so all we have to show is an agreement and that the abuses our plaintiffs suffered were reasonably foreseeable. . . . ***So we don't think we have to prove in any way that there's a direct connection between CACI interrogators and our plaintiffs***.

Dkt. #1625 at 141:12-142:2 (emphasis added). Plaintiffs also argued to the Court, "Our claim doesn't really turn on linking the particular interrogator to any of the plaintiffs. . . . [T]his linking thing, you know, we haven't objected to this, I understand this is their defense, but it is legally irrelevant." Dkt. #1625 at 6:12-17. In their closing rebuttal argument, Plaintiffs' counsel told the jury, "We do not need to prove that a particular CACI employee directly mistreated any of our clients; the only thing that we have to prove is that CACI interrogators, along with military intelligence, created an environment by giving instructions to the military police to abuse the

detainees, to soften them up for the interrogations." Dkt. #1626 at 72:18-22.[3] "Proof that CACI employees played a role in the *abuse of other detainees is therefore highly relevant*." Dkt. #1708 at 21 (emphasis added).

It was under this line of reasoning that the Court permitted Plaintiffs (over CACI's objections)[4] to put before the jury extensive evidence about the alleged misconduct of Messrs. Dugan, Johnson, and Stefanowicz, even though there is no evidence that any of these men interrogated any of the Plaintiffs.[5] Indeed, the Court affirmed that "my understanding has been there's no claim that's been made by the plaintiffs that any of the three plaintiffs themselves were interrogated by Dugan, Johnson and Stefanowicz, which are the three and the only three CACI people who've been identified as having been possibly complicit in the conspiracy." Dkt. #1625 at 7:1-6. Nonetheless, Plaintiffs admit that allegations that these men committed abused *other* detainees "are at the core of th[eir] case." Dkt. #1708 at 23 ("The instances of abuse described by the Taguba and Fay reports are at the core of this case . . . .").

Plaintiffs now ask the Court to hold CACI to a different standard for CACI's defense than Plaintiffs enjoy for their dubious conspiracy claims and to preclude evidence regarding OGA interrogators' influence on military police and abusive acts towards other detainees as irrelevant, because it lacks a connection with these Plaintiffs. Dkt. #1707 at 2. That begs the

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[3] In another opposition to CACI's pending motions *in limine*, Plaintiffs urge that "*even absent a direct connection between CACI interrogators and Plaintiffs*, the insufficient experience of CACI interrogators is relevant to the claims in this case." Dkt. #1702 at 6 (emphasis added).

[4] *See* Dkt. #1708 at 21 (citing Dkt. #94 at 65-68; Dkt. #679 at 38-40; Dkt. #1143) (Plaintiffs' opposition to CACI's pending motion to exclude the government reports citing some of instances in which "[t]he Court has rejected this argument time and time again.").

[5] The only caveat to this fact is one statement suggests Mr. Stefanowicz may have briefly questioned Mr. Al Ejaili during the IP roundup, but did nothing that would violate the interrogation rules of engagement during that encounter. Ex. 1 at 16 (DX-2).

question: Which is it? Is conduct by interrogators who did not interrogate or set conditions for Plaintiffs relevant or irrelevant? The answer cannot change depending on what suits Plaintiffs at that moment.

II. ANALYSIS

A. The Evidence Demonstrating OGA Interrogators at Abu Ghraib Created the Environment that Encouraged Abuse Is More Relevant to this Case than the Discrete Allegations Plaintiffs Have Been Permitted to Introduce Regarding Messrs. Stefanowicz, Dugan, and Johnson

CACI seeks to admit evidence – *from Plaintiffs' own exhibit, upon which Plaintiffs depend to prove conspiracy* – that (1) civilians from other government agencies ("OGA") conducted interrogations at the Abu Ghraib hard site and (2) the very same government investigations that noted discrete accusations against three CACI interrogators determined that OGA interrogators were responsible for "encourag[ing] Soldiers to deviate from prescribed techniques" and "provid[ing] a permissive and compromising climate for Soldiers," which "contributed to a loss of accountability and abuse at Abu Ghraib." *See* Ex. 2 (PTX-23 (Jones/Fay Report)) at 24, 33, and 43. This responds directly to Plaintiffs' claim that CACI interrogators can be held liable as conspirators because they allegedly "created an environment" in which detainees were abused. *See* Dkt. #1626 at 72:14-22; *see also* Dkt. #1625 at 144:13-23.

Plaintiffs argue that CACI should not be permitted to introduce evidence of OGA interrogators' influence over military police or acts of abuse at trial because, Plaintiffs say, they are "wholly unconnected to Plaintiffs." Dkt. #1707 at 2. As described above, this argument is irreconcilable with Plaintiffs' theory of the case, in which Plaintiffs insist CACI can be found liable because three CACI interrogators, *who were "wholly unconnected to Plaintiffs*," were accused of committing discrete acts of abuse, *which were also* "*wholly unconnected to Plaintiffs*." If Plaintiffs are correct that evidence about interrogators' conduct that is

unconnected to Plaintiffs is irrelevant, then all of the evidence regarding Messrs. Dugan, Johnson, and Stefanowicz is likewise irrelevant.

These fatal inconsistencies are not the only contradictions Plaintiffs embrace in their opposition. To support their argument, Plaintiffs say (incorrectly)[6] that there is no evidence any of the Plaintiffs was interrogated by an OGA interrogator. *Id.* at 2-3. Plaintiffs treat as conclusive that neither their "lengthy detainee files" nor "the logbooks of military police" say that Plaintiffs were interrogated by OGA. *Id.* This is quite a change of tune. Plaintiffs' position heretofore has been that "there's no evidence whatsoever that the government's record on [the identities of Plaintiffs' interrogators] are conclusive." Dkt. #1625 at 7:13-19; *id.* at 7:23-24 ("the government's records on this issue are not conclusive"). In fact, in one of their current oppositions to CACI's pending motions *in limine*, Plaintiffs blatantly mischaracterize an exchange with CACI counsel at trial to claim that "CACI agreed that the formal interrogation records available to the parties which showed interactions between Plaintiffs and CACI Interrogators A and G did not tell the full story." Dkt. #1702 at 7 (citing Dkt #1625 at 6:18-8:8) (claiming CACI's "counsel agree[d] that records only reflect formal interrogations and may be incomplete as to all interrogations").[7] So, again: Which is it? Are the detainee files and MP

[6] Plaintiffs miss that the possibility that OGA personnel interrogated them is the only way to explain why Plaintiffs' ever-changing accounts of their experiences at Abu Ghraib differ so dramatically from the U.S. Army records of their interrogations and treatment. Plaintiffs brush aside that Mr. Al Shimari claims to have been interrogated by a man with a ponytail, but ignore that the *only* evidence in the record is that *no one* from CACI at Abu Ghraib had a ponytail. *See* Dkt. #1634 at 93:2-5. Plaintiffs selectively cite deposition testimony from Army Interrogator I that CACI interrogators had "hair that's longer than regulation," Dkt. #1707 at 3, n.1, (*i.e.*, closely trimmed or completely shaved) but somehow fail to mention that the same interrogator testified that he knew of no interrogators who wore a ponytail or braid, Ex. 3 at 72:20-73:6 (Army Interrogator I Dep.).

[7] A glance the transcript reveals that counsel did not, in fact, agree to any such thing. CACI's counsel agreed to include the words "formal interrogation" in a stipulation requested by

(Continued …)

logbooks conclusive or incomplete? They cannot be conclusive for purposes of eliminating the possibility that OGA interrogators interrogated Plaintiffs, but incomplete for purposes of eliminating the possibility that Messrs. Dugan, Johnson, and Stefanowicz interrogated Plaintiffs.

Plaintiffs unabashedly mischaracterize the Jones/Fay report to support their argument. Plaintiffs accuse CACI of overstating the report's findings with respect to OGA influence and conduct and say the report "identified 'primary causes,'" for detainee abuse "which specifically included the conduct of civilian *contractors*." *See* Dkt. #1707 at 6 (citing PTX-23 at 3-4) (emphasis added). That's just not true. Here is what the report identifies as the "primary causes" for the abuse that occurred at Abu Ghraib:

> "There is no single, simple explanation for why this abuse at Abu Ghraib happened. The primary causes are misconduct (ranging from inhumane to sadistic) by a small group of morally corrupt soldiers and civilians, a lack of discipline on the part of the leaders and Soldiers of the 205th MI BDE and a failure or lack of leadership by multiple echelons within CJTF-7."

See Ex. 2 at 3 (PTX-23). This statement does not specify civilian *contractors* at all – just civilians generally, which would include OGA interrogators.

Plaintiffs are so desperate to limit the scope of OGA influence at Abu Ghraib and distance themselves from its ambit that they repeatedly, and speciously, claim that OGA only dealt with so-called "ghost detainees." *See, e.g.*, Dkt. #1707 at 1, 3, 6, 7, 9, and 10. That also is not true. Although ghost detainees were certainly *part* of the reason OGA operations at Abu

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the Court to address the fact that, despite the mountain of evidence Plaintiffs lobbed into the trial regarding these men, neither Messrs. Stefanowicz, Dugan, or Johnson ever formally interrogated any of the Plaintiffs. True to form, after agreeing at the bench to a stipulation with that caveat, Plaintiffs backtracked and refused the Court's direction to "work together [with CACI] and make a proposed simple instruction to the jury" explaining this point. *Compare id.* at 6:23-8:17 (agreeing to a stipulation) *with id.* at 141:12-7 (refusing to stipulate because "***level of connection is legally irrelevant***") (emphasis added).

Ghraib were problematic, OGA operations and abusive tactics went well beyond what Plaintiffs blithely refer to as the "administrative confusion" caused by unaccounted for detainees. *Id.* at 3. Indeed, Plaintiffs' own exhibit makes clear that OGA and MI interrogators questioned the same detainees with such frequency that "JIDC policy was that an Army interrogator had to accompany OGA if they were interrogating one of the detainees MI was also interrogating." Ex. 2 at 78 (PTX-23) (noting Col. Jordan later changed that policy and allowed OGA interrogators to question overlapping detainees "without the presence of Army personnel"); *see also id.* at 43 ("The CIA conducted unilateral *and joint* interrogation operations at Abu Ghraib.") (emphasis added).[8]

The fact is that Generals Jones and Fay concluded that OGA operations at Abu Ghraib wrought havoc on detainee and interrogation operations. When compared to the discrete allegations against CACI interrogators that affected a handful of detainees (who were not Plaintiffs), it becomes clear that, if anyone caused the "small group" of people who abused detainees of the hard site to behave the way that they did, it was OGA. The Court need not take CACI's word for it. The report is replete with descriptions of OGA influence from which the Court can determine for itself that OGA's effect on interrogations went well beyond miscellaneous instances of misconduct and, *unlike the isolated allegations against CACI*, created the environment for abuse. For example:

> - "Other Contributing Factors. No single, or simple, cause explains why some of the Abu Ghraib abuses happened. In addition to the leadership failings discussed above, other contributing factors include: . . . Interaction with OGA and other agency interrogators who did not follow the same rules as U.S. Forces. There was at least the perception, and perhaps the reality, that non-DOD agencies had different rules regarding interrogation and detention operations. *Such a*

[8] *See also* Ex. 2 at 33-34 (PTX-23) (making extensive findings and recommendations regarding other government agencies without mentioning "ghost detainees" even once).

perception encouraged Soldiers to deviate from prescribed techniques." *Id.* at 24 (emphasis added).

- "Proliferation of Interrogation and Counter-Resistance Technique memorandums, with specific categorization of unlawful combatants in various theaters of operations, *and the inter-mingling of tactical, strategic, and other agency interrogators at the central detention facility of Abu Ghraib, provided a permissive and compromising climate for Soldiers*." *Id.* at 33 (emphasis added).

- OGA's "detention and interrogation practices contributed to a loss of accountability and abuse at Abu Ghraib." *Id.* at 43.

- "LTC Jordan allowed OGA to do interrogations without the presence of Army personnel (Reference Annex B, Appendix 1, WOOD, THOMPSON, and PRICE). Prior to that time, JIDC policy was that an Army interrogator had to accompany OGA if they were interrogating one of the detainees MI was also interrogating. *. . . The lack of OGA adherence to the practices and procedures established for accounting for detainees eroded the necessity in the minds of Soldiers and civilians for them to follow Army rules*." *Id.* at 78-79 (emphasis added).

- OGA "detention and interrogation practices led to a loss of accountability, abuse, reduced interagency cooperation, and an unhealthy mystique that further *poisoned the atmosphere at Abu Ghraib*." *Id.* at 86-87.

- "The systemic lack of accountability for interrogator actions and detainees plagued detainee operations in Abu Ghraib." *Id.* at 88 (within a section addressing OGA interrogators).

- Instances of OGA misconduct "were widely known within the US community (MI and MP alike) at Abu Ghraib. Speculation and resentment grew over the lack of personal responsibility, of some people being above the laws and regulations. The resentment *contributed to the unhealthy environment that existed at Abu Ghraib*." *Id.* (emphasis added).

- "**Finding**: Other Government Agency (OGA) interrogation practices led to a loss of accountability at Abu Ghraib." *Id.* at 152.

Plaintiffs' only argument with any legs is that evidence demonstrating OGA interrogators were involved in an alleged conspiracy to abuse detainees at the hard site does not, by itself, prove that CACI interrogators were not also part of that conspiracy. Dkt. #1707 at 7. This is true, and certainly an argument Plaintiffs can try to make to the jury at trial, but Plaintiffs' advocacy of an alternative theory is not the standard for excluding CACI's response. "Evidence

is relevant if it has *any tendency* to make a fact [of consequence] more or less probable than it would be without the evidence." Fed. R. Evid. 401. Plaintiffs' argument – which CACI disputes – that both OGA and CACI interrogators participated in a conspiracy does not render evidence of OGA's adverse influence on military police irrelevant. If the actions of interrogators who are not connected to Plaintiffs are relevant based on Plaintiffs' "shaky" conspiracy theory, then that determination applies with equal force to *all* interrogators – not just the ones that Plaintiffs decided to sue. CACI is entitled to argue that OGA interrogators created the abusive environment at Abu Ghraib and that the isolated events involving CACI interrogators were just that – isolated events – that had no relationship to any broad conspiracy that could have affected Plaintiffs.

B. Plaintiffs' Invented Prejudice Does Not Substantially Outweigh the Probative Value of Evidence that OGA – *Not CACI* – Created the Abusive Environment Upon Which Plaintiffs Base their Conspiracy Claims

The only position Plaintiffs have not abandoned for purposes of opposing this motion is their favorite refrain, in which any evidence that is harmful to Plaintiffs' case – no matter the purpose for which it is offered – must be excluded because sly CACI will use it to convince a gullible jury that Plaintiffs are terrorists who got what they deserved. Dkt. #1707 at 8 ("[E]vidence regarding OGA conduct is CACI's latest means of suggesting to the jury that Plaintiffs are terrorists and that any abuse they suffered was somehow justified or less reprehensible").[9] No one can blame Plaintiffs for resorting to this argument at every turn; it has had a high success rate for removing damaging evidence from the case. But surely there are limits to what this gambit can accomplish for them. Contrary to Plaintiffs' representations,

[9] No doubt, Plaintiffs will point to this passage and accuse CACI of calling them terrorists, as opposed to paraphrasing Plaintiffs' own caricature of CACI's arguments.

CACI has not and will not argue or even insinuate to the jury that torture could ever be justified. Moreover, as the first trial demonstrated in spades, the jurors in this district are smart and there is no reason to think they would tolerate such a repugnant approach.

Nonetheless, Plaintiffs howl that CACI wants to "mislead and inflame the jury in ways previously disallowed by the Court." Dkt. #1707 at 2. Apparently, Plaintiffs subscribe to the propagandist maxim that if you "repeat a lie often enough and it becomes the truth." *See, e.g.*, Dkt. #1226; Dkt. #1293; Dkt. #1557 at 10; Dkt. #1576 at 9-10; Dkt. #1680; Dkt. #1704; Dkt. #1707 at 2.[10] According to Plaintiffs, "Jurors will recognize the CIA and the FBI as the government's highest-level intelligence apparatus and will assume . . . that if those agencies conducted interrogations at Abu Ghraib the facility's detainees must have been particularly important to the national security of the United States." Dkt. #1707 at 8. Teased out, Plaintiffs' syllogism goes that if the jury concludes that, because OGA interrogated *some* detainees at Abu Ghraib, *all* the detainees at Abu Ghraib were of national security interest (a logical long jump), then the jury will also conclude Plaintiffs were of national security interest and, therefore, terrorists (a logical back flip). This notion is, to be charitable, silly.

Plaintiffs next protest that "CACI hopes" acknowledging OGA's misconduct at Abu Ghraib "will convince the jury that CACI's abuses were authorized by the government, and that

[10] Plaintiffs showcase their penchant for twisting unrelated facts into accusations of terrorism in this opposition. Plaintiffs spent a full-page retreading Col. Pappas' *de bene esse* deposition to urge that CACI "sought to elicit testimony designed to convey that detainees at Abu Ghraib (like Plaintiffs) were terrorists who possessed highly sensitive national security information." Dkt. #1707 at 4. In fact, CACI sought to identify the groups into which detainees and interrogation teams were divided in order to prove that none of the Plaintiffs were interrogated by Messrs. Dugan, Johnson, or Stefanowicz (a.k.a., the "wholly unconnected" interrogators upon whom Plaintiffs base their case) and that there were other civilians operating out of Abu Ghraib. Ex. 4 at 33:10-38:18, 47:14-17. But Plaintiffs' thin skins received priority over CACI's defense.

the government is ultimately responsible or more responsible than CACI for abuses" and will "suggest that [CACI's] abuses were comparatively benign." *Id.* at 10. But, as Plaintiffs aptly point out, none of these purposes would assist CACI: relative culpability in a conspiracy is still culpability. So, with all due respect to Plaintiffs' mind-reading skills, CACI actually does not "hope" the jury will reach either conclusion. CACI's hopes are not nearly so nuanced. CACI hopes the jury will understand that, to the extent any conspiracy existed, it involved OGA interrogators, who the government determined had a significant influence over detainee and interrogation operations, and not CACI interrogators, about whom the government noted a few, isolated allegations that did not even remotely involve Plaintiffs and for which no one was ever prosecuted.

Plaintiffs' last refuge is to convince the Court that the hassle associated with allowing this probative evidence at trial is too great. Plaintiffs emphasize that OGA primarily refers to the CIA, *id.* at 3, 6, 8, 10, in a transparent effort to alarm the Court. Perhaps Plaintiffs forget that the Court has presided over more than its fair share of sensational trials that involve national security and is unlikely to flinch at the mention of the Central Intelligence Agency. *See, e.g.*, *United States v. Sterling*, No. 1:10-cr-485 (LMB); *United States v. Moussaoui*, No. CRIM. 01–455–A.

Plaintiffs urge that the Court has already determined that evidence of OGA misconduct is too "incendiary" to be admitted at trial and, in their best Chicken Little imitation, squawk that "CACI is no doubt prepared to launch a mini-trial[!]" with respect to the detainee who died during an OGA interrogation at Abu Ghraib. Dkt. #1707 at 10, n.5. Plaintiffs carefully avoid mentioning that the Court made the determinations related to OGA evidence *to protect CACI* from Plaintiffs using that information to inflame the jury. *See* 2/27/2019 H'ring Tr. at 39:12-17 ("[T]he detainee who was brought in by an OGA and died and then was packed up in ice, that

shouldn't come into this case. There's absolutely no indication that any of the CACI people or the interrogators would have been involved with that. That to me is too incendiary.").

Moreover, CACI neither needs nor intends to do anything beyond offering Plaintiffs' own exhibits and witnesses' testimony into evidence. Those are sufficient to establish OGA's influence on detention and interrogation operations and individual instances of misconduct with which, as the Court noted and Plaintiffs' witness Sabrina Harman will corroborate, "[t]here's absolutely no indication that any of the CACI people or the interrogators would have been involved." *See, e.g.*, Ex. 2 at 5, 24, 33-34, 43, 78, 86-89, 152 (PTX-23); Ex. 5 (PTX-36) (photograph of Sabrina Harman posing for a picture with a thumbs-up with deceased detainee). For that reason, Plaintiffs' putative concerns that allowing evidence related to OGA's role at Abu Ghraib "would open up . . . new disputes with the government, and potentially additional discovery, on the eve of retrial" are unfounded. CACI does not seek to introduce any information that is not already in the public record. The government kneecapped CACI's defense by concealing information critical to that defense; it does not, however, have ability to withhold or keep from the jury evidence that is already public knowledge. The excerpts from the Jones/Fay report referencing OGA activities at Abu Ghraib are available all over the Internet; they are hardly a state secret or in any way sensitive.

III. CONCLUSION

For the foregoing reasons, the Court should allow CACI to present evidence regarding the influence and conduct of OGA interrogators at Abu Ghraib.

Respectfully submitted,

/s/ John F. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of September, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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