

No. 24–856

IN THE
SUPREME COURT OF THE UNITED STATES

CISCO SYSTEMS, INC., ET AL.,
Petitioners,

v.

DOE I, ET AL.,
Respondents.

On Writ of *Certiorari*
to the U.S. Court of Appeals for the Ninth Circuit

Brief of the Former U.N. Special Rapporteurs as
Amici Curiae on Torture in Support of Respondent

William J. Aceves
California Western
School of Law
225 Cedar Street
San Diego, CA 92101

Brian Olney
Counsel of Record
Hadsell Stormer Renick
& Dai
128 N. Fair Oaks Ave.
Pasadena, CA 91103
Tel. 626-585-9600
bolney@hadsellstormer.com

Counsel for *Amici Curiae*

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INTEREST OF *AMICI CURIAE*

This Brief of *Amici Curiae* is respectfully submitted in support of the Respondents.¹ *Amici* are the former U.N. Special Rapporteurs on Torture. The U.N. Special Rapporteur is appointed by the United Nations to examine questions relating to torture and other cruel, inhuman, or degrading treatment or punishment.² Accordingly, *Amici* are recognized experts in international law and human rights. They have taught and written extensively on these subjects. Indeed, their work is regularly cited with approval by legal scholars and human rights bodies throughout the world.

¹ No counsel for a party authored this brief in whole or in part, and no such counsel or party made a monetary contribution intended to fund the preparation or submission of this brief. No person other than the *amici curiae*, or their counsel, made a monetary contribution to its preparation or submission.

² See U.N. Comm'n on Human Rights, Resolution Regarding Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, U.N. Doc. E/CN.4/Res/1985/33 (Mar. 13, 1985). The U.N. Special Rapporteur's mandate includes transmitting appeals to states with respect to individuals who are at risk of torture as well as submitting communications to states with respect to individuals who were previously tortured. The U.N. Special Rapporteur's mandate was most recently renewed by the Human Rights Council of the United Nations in April 2023. See U.N. Human Rights Council, Resolution Adopted by the Human Rights Council on 3 April 2023: Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Mandate of the Special Rapporteur, U.N. Doc. A/HRC/RES/52/7 (Apr. 13, 2023).

Juan E. Méndez served as the U.N. Special Rapporteur on Torture from 2010 to 2016. In 2017, Professor Méndez was appointed a Commissioner of the International Commission of Jurists. Previously, Professor Méndez served as Co-Chair of the Human Rights Institute of the International Bar Association (London) in 2010 and 2011 and Special Advisor on Crime Prevention to the Prosecutor of the International Criminal Court from 2009 to 2010. Between 2000 and 2003, he was a member of the Inter-American Commission on Human Rights for the Organization of American States, and he served as its President in 2002. Professor Méndez served as the Special Advisor to the U.N. Secretary-General (Kofi Annan) on the Prevention of Genocide (2004-2007) and was a member of the U.N. Expert Mechanism on Law Enforcement and Racism (2020-2024).

Manfred Nowak served as the U.N. Special Rapporteur on Torture from 2004 to 2010. He is currently Professor of International Law and Human Rights in Vienna and Secretary General of the Global Campus of Human Rights in Venice. He has held professorships in Utrecht, Lund, Geneva, and Stanford and served in many expert functions for the United Nations, the Council of Europe, the European Union, and other organizations. These include serving as the United Nations Expert on Enforced Disappearances, Judge and Vice-President of the Human Rights Chamber for Bosnia and Herzegovina in Sarajevo, U.N. Special Rapporteur on Torture, Vice-Chair of the EU Fundamental Rights Agency, and Independent

Expert leading the U.N. Global Study on Children Deprived of Liberty. Professor Nowak has written extensively on the subject of torture, including THE UNITED NATIONS CONVENTION AGAINST TORTURE AND ITS OPTIONAL PROTOCOL: A COMMENTARY (Manfred Nowak et al. eds., 2d ed. 2019), *Challenges to the Absolute Nature of the Prohibition of Torture and Ill-Treatment*, 23 NETH. Q. HUM. RTS. 674 (2005), and *What Practices Constitute Torture? U.S. and U.N. Standards*, 28 HUM. RTS. Q. 809 (2006).

Amici recognize the importance of the international prohibition against torture and the corresponding obligations to prevent torture and to hold accountable those responsible for such acts. These issues form the core of the Special Rapporteur's mandate. Over many years, the Special Rapporteur has submitted reports to the United Nations highlighting the obligation of all states to comply with the prohibition against torture.³ See, e.g., U.N. General Assembly, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or

³ See also U.N. General Assembly, Trends and Developments in the Global Struggle to End Torture: Annual Overview of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment [Alice Jill Edwards], U.N. Doc. A/80/137 (July 11, 2025); U.N. Hum. Rts. Comm., Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Hostage-Taking as Torture: Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment [Alice Jill Edwards], U.N. Doc. A/HRC/58/55 (Feb. 6, 2025).

Punishment [Juan E. Méndez], U.N. Doc. A/HRC/16/52 (Feb. 3, 2011); U.N. General Assembly, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment [Manfred Nowak], U.N. Doc. A/HRC/13/39/Add.5 (Feb. 5, 2010). Their work on these issues makes them uniquely qualified to address the role of aiding and abetting liability in cases involving torture.

Accordingly, *Amici* would like to provide the court with their perspective on the issues presented in this case. They believe this submission will assist the Court in its deliberations.

SUMMARY OF ARGUMENT

The prohibition against torture is among the most firmly established norms in international law. Torture is universally condemned in treaty law, customary international law, and general principles of law, and it is universally recognized as a *jus cogens* norm—one from which no derogation is permitted. Yet the effectiveness of this prohibition depends not only on holding accountable those who directly inflict torture but also on those who knowingly assist or facilitate such acts. In practice, torture rarely occurs in isolation; it often depends on institutional support, logistical assistance, intelligence sharing, and material aid from actors who may never physically participate in the abusive act.

Aiding and abetting liability is therefore essential to ensuring the prohibition against torture is meaningful rather than symbolic.

Without such liability, actors who facilitate torture, such as corporations that provide advanced surveillance technology or instruments of abuse, could evade accountability despite playing critical roles in the facilitation of torture. Accordingly, international law has long recognized that responsibility extends beyond principal perpetrators. By imposing liability on those who knowingly provide assistance to torture, aiding and abetting liability reinforces deterrence, closes accountability gaps, and protects the integrity of this fundamental international norm.

ARGUMENT

I. AIDING AND ABETTING LIABILITY IS WELL-ESTABLISHED IN INTERNATIONAL LAW

From the Nuremberg proceedings to the recent case law of international criminal tribunals, it is well established that a wide range of conduct may give rise to liability under international law, including committing, ordering, planning, or aiding and abetting in the execution of a crime. *See generally* MARINA AKSENOVA, *COMPLICITY IN INTERNATIONAL CRIMINAL LAW* (2016); NEHA JAIN, *PERPETRATORS AND ACCESSORIES IN INTERNATIONAL CRIMINAL LAW* (2014); FLAVIO NOTO, *SECONDARY LIABILITY IN INTERNATIONAL CRIMINAL LAW* (2013); ELIES VAN SLIEDREGT, *INDIVIDUAL CRIMINAL RESPONSIBILITY IN INTERNATIONAL LAW* (2012).

Recognizing various forms of liability is essential to the enforcement of international law because it ensures that those individuals who

facilitate the commission of a crime are held accountable for their actions. This basic principle of international criminal law was recognized by the International Military Tribunal at Nuremberg.

Hitler could not make aggressive war by himself. He had to have the co-operation of statesmen, military leaders, diplomats and businessmen. When they, with knowledge of his aims, gave him their co-operation, they made themselves parties to the plan he had initiated. They are not to be deemed innocent because Hitler made use of them, if they knew what they were doing.

United States v. Goering, et al., International Military Tribunal, Oct. 1, 1946, Nazi Conspiracy and Aggression: Opinion and Judgment 55–56 (1947).

Allied Control Council Law No. 10, which was established to prosecute German war criminals after the Second World War, recognized criminal liability for individuals who committed war crimes, crimes against humanity, and crimes against peace. It also recognized liability for those who aided and abetted in such crimes.⁴ Control Council

⁴ *See also* Agreement for the Prosecution and Punishment of Major War Criminals of the European Axis, and Establishing the Charter of the International Military Tribunal, art. 6, Aug. 8, 1945, 82 U.N.T.S. 279 (“Leaders, organizers, instigators and accomplices participating in the formulation or execution of a common plan or conspiracy to commit any of the foregoing crimes are responsible for all acts performed by any persons in execution of such plan.”).

Law No. 10, Punishment of Persons Guilty of War Crimes, Crimes Against Peace and Against Humanity, art. II(1) Dec. 20, 1945, 3 Official Gazette Control Council for Germany 50–55 (1946). Article II(2) provided that “[a]ny person without regard to nationality or the capacity in which he acted, is deemed to have committed a crime as defined in paragraph 1 of this Article, if he was (a) a principal or (b) was an accessory to the commission of such crime or ordered or abetted the same or (c) took a consenting part therein or (d) was connected with plans or enterprises involving its commission”

In *United States v. Ohlendorf*, for example, a U.S. Military Tribunal established under Control Council Law No. 10 concluded that defendant Waldemar Klingelhofer could be convicted “as an accessory” because in turning over lists of suspected communists to Nazi officials “he was aware that the people listed would be executed when found.” 4 *Trials of War Criminals Before the Nuremberg Military Tribunals Under Control Council Law No. 10*, at 569 (1949). The Tribunal also recognized that the defendant Lothar Fendler could be convicted for failure to protest abuses about which the defendant knew, when failure to do so “in any way contributed” to the abuses. *Id.* at 572–73. In *United States v. Flick*, the defendant Otto Steinbrinck was convicted by a U.S. Military Tribunal under settled legal principles for knowingly contributing money to an organization committing widespread abuses, even though it was “unthinkable” he would “willingly be a party” to

atrocities. 6 Trials of War Criminals Before the Nuremberg Military Tribunals Under Control Council Law No. 10, at 1217, 1222 (1952).

These World War II-era cases reveal that the obligation to refrain from assisting the commission of internationally wrongful acts applies to all members of society, including private individuals, government officials, and corporations.⁵ Indeed, these cases emphasized that corporate structure could not be used to remove liability for human rights abuses, including the aiding and abetting of such acts.

Fifty years later, the Statute of the International Criminal Tribunal for the former Yugoslavia (“ICTY”) established criminal liability for several international crimes committed during the Yugoslav conflict. Statute of the International Criminal Tribunal for the Former Yugoslavia, arts. 2-5, U.N. Doc. S/RES/827 (1993). Article 7(1) of the ICTY Statute then added that “[a] person who planned, instigated, ordered, committed or

⁵ Several decisions issued by the Nuremberg tribunals after World War II addressed the liability of corporate officials for human rights abuses. *See, e.g.*, United States v. Krauch (The I.G. Farben Case), 8 Trials of War Criminals Before the Nuremberg Military Tribunals Under Control Council Law No. 10, at 1081 (1952); United States v. Flick, 6 Trials of War Criminals Before the Nuremberg Military Tribunals Under Control Council Law No. 10, at 1202 (1952). While these cases involved corporate officials, “they nonetheless routinely spoke in terms of corporate responsibilities and obligations.” Steven Ratner, *Corporations and Human Rights: A Theory of Legal Responsibility*, 111 YALE L.J. 443, 477 (2001).

otherwise aided and abetted in the planning, preparation or execution of a crime referred to in articles 2 to 5 of the present Statute, shall be individually responsible for the crime.”⁶

In one of its earliest decisions, the ICTY stated that “[t]he principles of individual criminal responsibility enshrined in Article 7, paragraph 1, of the Statute reflect the basic understanding that individual criminal responsibility for the offences under the jurisdiction of the International Tribunal is not limited to persons who directly commit the crimes in question.”⁷ *Prosecutor v. Delalić*, Case No. IT-96-21-T, Trial Judgment, ¶ 319 (Int’l Crim. Trib. for the Former Yugoslavia Nov. 16, 1998). Liability thus extends to those individuals who aid and abet the crimes within the ICTY’s jurisdiction. *See also Prosecutor v. Tadic*, Case No. IT-94-1-A, Appeals Judgment, ¶ 191 (Int’l Crim. Trib. for the Former Yugoslavia July 15, 1999).

Building on the case law of the ICTY, the Special Court for Sierra Leone provided a detailed summary of aiding and abetting liability under

⁶ The Statute of the International Criminal Tribunal for Rwanda contains a similar description of individual criminal responsibility. Statute of the International Criminal Tribunal for Rwanda, art. 6(1), U.N. Doc. S/RES/955 (1994).

⁷ Because the ICTY is “only empowered to apply” standards that are “beyond any doubt customary law,” its judgments should be accorded substantial weight in determining the content of customary international law. *Prosecutor v. Tadic*, Case No. IT-94-1-T, Trial Judgment, ¶¶ 661–662 (Int’l Crim. Trib. for the Former Yugoslavia May 7, 1997).

international law. In *Prosecutor v. Taylor*, Case No. SCSL-03-01-A, Appeals Judgment, ¶ 369 (Sp. Ct. for Sierra Leone Sept. 26, 2013) (citations omitted), the Special Court indicated that aiding and abetting liability exists for those individuals who provide assistance, encouragement, or moral support to the underlying crime. The Special Court then offered several examples of aiding and abetting in support of the predicate crimes. Even “[t]he acts and conduct of an accountant, architect or dentist in their respective professional roles can have a substantial effect on the commission of crimes, as can those of prosecutors, judges and religious officials.” *Id.* (citations omitted).

Finally, aiding and abetting liability is expressly recognized in the Rome Statute of the International Criminal Court. *See generally* KAI AMBOS, *ROME STATUTE OF THE INTERNATIONAL CRIMINAL COURT: ARTICLE-BY-ARTICLE COMMENTARY* 1189 (4th ed. 2022); WILLIAM A. SCHABAS, *AN INTRODUCTION TO THE INTERNATIONAL CRIMINAL COURT* 215 (5th ed. 2022). Article 25(3)(c) of the Rome Statute of the International Criminal Court provides that a person can be held criminally responsible if that person, “for the purpose of facilitating the commission of such a crime, aids, abets or otherwise assists in its commission or its attempted commission, including providing the means for its commission.” Rome Statute of the International Criminal Court art. 25(3)(c), July 17, 1998, 2187 U.N.T.S. 90. This provision reflects a core principle of international criminal law: liability extends beyond the principal perpetrator to those who

knowingly contribute to the commission of international crimes. By recognizing liability for those who facilitate international crimes, the Rome Statute ensures that individuals who provide material or logistical support cannot evade accountability merely because they did not directly carry out the criminal act.

In sum, aiding and abetting is a well-established theory of liability under international law. It represents a central feature of international criminal law, ensuring that facilitators of human rights abuses are held accountable for their actions.

II. AIDING AND ABETTING LIABILITY IS NECESSARY TO ERADICATE TORTURE

The prohibition against torture is among the most firmly established norms in international law. It is codified in several international agreements, including the Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment Dec. 10, 1984, 1465 U.N.T.S. 85 (“CAT”). It is a peremptory norm that allows for no derogation. *See generally* STUART CASEY-MASLEN, *THE PROHIBITION OF TORTURE AND ILL-TREATMENT UNDER INTERNATIONAL LAW* 81 (2025); *THE UNITED NATIONS CONVENTION AGAINST TORTURE AND ITS OPTIONAL PROTOCOL: A COMMENTARY* 91 (Manfred Nowak et al. eds., 2d ed. 2019).

The effectiveness of this prohibition depends not only on holding accountable those who directly inflict torture but also on those who knowingly assist or facilitate such acts. Aiding and abetting liability is therefore essential to ensuring the

prohibition against torture is meaningful rather than merely symbolic. By imposing liability on those who knowingly provide assistance to torture, aiding and abetting liability reinforces deterrence, closes accountability gaps, and protects the integrity of this fundamental norm. *See generally* Oona A. Hathaway et al., *Aiding and Abetting in International Criminal Law*, 104 CORNELL L. REV. 1593, 1597 (2019) (“Addressing complicity through aiding and abetting liability attends to the goals of justice.”); Sarah L. Swan, *Aiding and Abetting Matters*, 12 J. TORT L. 255 (2019) (describing the value of aiding and abetting liability); Miles Jackson, *Freeing Soering: The ECHR, State Complicity in Torture and Jurisdiction*, 27 EUR. J. INT’L L. 817 (2016) (same).

A. Torture Is a Collective Enterprise

Torture rarely occurs as an isolated act by a single individual. Ryan Plasencia, *Suing the Aiders and Abettors of Torture: Reviving the Torture Victim Protection Act*, 105 MINN. L. REV. 2055, 2070 (2022) (“[T]orturers do not work alone.”). Instead, it often emerges from systems involving multiple participants, including interrogators, intelligence agents, medical personnel, and logistical facilitators.⁸ JAIN, *supra*, at 5 (“Atrocity cannot be

⁸ *See, e.g.*, U.N. General Assembly, Interim Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment [Nils Melzer], ¶8, U.N. Doc. A/76/168 (July 16, 2021) (“Accountability for torture or ill-treatment signifies the holding to account of individuals,

perpetrated on such a widespread basis unless it is accompanied by the vigorous participation of a very large number of ordinary people.”). For example, a detention official may authorize abusive interrogation techniques, an intelligence officer may supply questions intended to pressure detainees, and another actor may provide the physical facilities used for abuse. Private entities may provide the surveillance technology or the killing instruments. All these actors are essential links in the causal chain of abuse.

Some actors are public officials; others may be private individuals. Some actors are physically and temporally present when torture occurs; others may be distant or separated from the abuse. Some actors are human beings; others may be legal persons. While these actors may contribute in different ways, each plays a necessary role in enabling torture. Antonio Cassese, *The Proper Limits of Individual Responsibility under the Doctrine of Joint Criminal Enterprise*, 5 J. INT’L CRIM. JUST. 109, 110 (2007) (arguing that international crimes, such as torture, often represent an expression of collective criminality).

In sum, international crimes, such as torture, are often perpetrated “with the assistance of third-party accomplices.” Hathaway, *supra*, at 1640.

public authorities or the State itself as an entity, as well as corporations, organizations and other collective bodies, in respect of any act or omission that may engage their responsibility under the prohibition of torture and ill-treatment.”).

Accordingly, aiding and abetting liability is necessary to hold accountable those who assist others in torture.

B. Deterrence Requires Aiding and Abetting Liability for Facilitators

The prohibition against torture generates both *ex post* and *ex ante* obligations. States are obligated to punish acts of torture when they occur. But they are also obligated to prevent torture. Aiding and abetting liability promotes compliance with both obligations.

Holding facilitators accountable through aiding and abetting liability serves an important deterrent function.⁹ If public officials believe that delegating any link in the causal chain of abuse to private actors facilitates impunity, they will be emboldened to do so. If private actors believe they can avoid liability by simply remaining one step removed from the physical act of torture, they will be

⁹ *See generally* U.N. General Assembly, Interim Report of the Special Rapporteur on Torture and other Cruel, Inhuman or Degrading Treatment or Punishment [Nils Melzer], ¶ 10, U.N. Doc. A/76/168 (July 16, 2021) (“Investigating and redressing non-compliance with the prohibition of torture and other ill-treatment are inextricably linked to the absolute and non-derogable character of the prohibition and the imperative of securing everyone’s right to be free from torture and ill-treatment. Evasion or obstruction of accountability for torture or ill-treatment therefore entails the violation . . . of . . . concrete legal obligations . . . [and] the spirit and purpose of the entire normative edifice derived from the prohibition of torture and ill-treatment.”).

motivated to do so. A legal regime that imposes liability to both perpetrators and facilitators sends a clear message: states cannot facilitate torture through outsourcing to private actors. AKSENOVA, *supra*, at 53–80; SáCouto, *supra*, at 208. As governments outsource more functions to private actors, this accountability regime becomes even more important.¹⁰ Indeed, private actors may be particularly susceptible to accountability. See Leigh A. Payne & Gabriel Pereira, *Corporate Complicity in International Human Rights Violations*, 12 ANN. REV. L. & SOC. SCI. 63, 68 (2016) (“Deterrence theory would suggest therefore that the credible threat of judicial action against firms that commit abuses would signal to the business community the heightened cost of human rights violations, thus curbing such behavior.”). See also Sabine Michalowski, *No Complicity Liability for Funding Gross Human Rights Violations*, 30 BERKELEY J. INT’L L. 451, 451–54 (2012) (noting that gross human rights violations are seldom committed without corporate involvement).

The growing diffusion of international criminality makes aiding and abetting liability even more important. As noted, human rights abuses are often a collective enterprise, which can facilitate abuses. See Susana SáCouto et al., *Collective Criminality and Sexual Violence: Fixing*

¹⁰ See U.N. General Assembly, Interim Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment [Alice Jill Edwards], ¶34, U.N. Doc. A/78/324 (Aug. 24, 2023).

a Failed Approach, 33 LEIDEN J. INT'L L. 207, 208 (2020) (“A false sense of impunity derived from the collective presence unleashes ‘the worst’ in the members of the group, leading them to commit acts they would likely not have committed when acting alone.”). Aiding and abetting liability ensures that responsibility extends beyond the immediate perpetrators to those who design, enable, or support abusive practices. Nikola R. Hajdin, *Neutral Business Assistance and the Limits of Complicity Under International Criminal Law*, 45 MICH. J. INT'L L. 381, 386–87 (2024) (“In these cases, ensuring the accountability of not only the direct perpetrators, but also those who contributed to the overall criminal endeavor, is imperative to prevent any evasion of justice.”).

Entities cannot do through another what they cannot do themselves. If liability were limited only to those who physically inflicted pain, many facilitators could escape accountability despite their substantial involvement. Aiding and abetting liability prevents such gaps by recognizing that those who knowingly assist torture also bear responsibility for its consequences.

C. Aiding and Abetting Liability Reflects the Reality of Modern Human Rights Violations

Modern human rights violations such as torture, are rarely isolated acts of cruelty; they are often embedded within complex structures that enable and sustain them. In many contexts, torture is carried out through coordinated efforts that obscure accountability. Legal and political systems

normalize abuse through rhetoric about national security or public order, bureaucratic procedures generate distance and anonymity, and supply chains allow private actors to distance themselves from direct culpability. The commission of torture is reinforced by secrecy, weak oversight, and the suppression of dissent.

Perpetrators of human rights abuses, such as those in this case, are frequently part of a complex network of actors, including government officials, private entities, and institutional intermediaries. These actors may provide transportation, detention facilities, interrogation technology, or intelligence that contributes to torture. Through these networks, those who facilitate torture may be physically and temporally separated from the direct perpetrators as well as their victims. JAIN, *supra*, at 4–5. But they are no less responsible.

Victims of human rights abuses, such as those in this case, are also frequently members of a minority group. They are not chosen for abuse based on individual characteristics. Rather, they are “chosen solely because of their membership in a group.” Mark A. Drumbl, *Collective Violence and Individual Punishment: the Criminality of Mass Atrocity*, 99 NW. U. L. REV. 539, 571 (2005). See also JAIN, *supra*, at 3 (“[T]he victims of international crimes are mostly chosen not based on their individual characteristics, but because of their actual or perceived membership . . . [in] a collective.”); Robert D. Sloane, *The Expressive Capacity of International Punishment: The Limits of the National Law Analogy and the Potential of*

International Criminal Law, 43 STAN. J. INT'L L. 39, 57 (2007) (“With respect to some crimes, the collective nature of the victim is clear.”).

Legal accountability must therefore reflect the complex and systematic nature of modern torture. Aiding and abetting liability recognizes that serious crimes can be committed through cooperation, facilitation, and shared responsibility. By imposing liability on those who provide knowing assistance, the law aligns with the practical realities of how torture occurs. Cassese, *supra*, at 110. *See also* U.N. General Assembly, Interim Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment [Nils Melzer], ¶ 27, U.N. Doc. A/76/168 (July 16, 2021) (arguing that accountability must extend to direct perpetrators as well as those who are complicit or participate in such abuse through instigation, consent, or acquiescence).

In sum, the underlying principle of aiding and abetting liability is deceptively simple: helping someone commit a wrong is wrong.

CONCLUSION

For these reasons, *Amici* respectfully request that this Court rule in favor of the Respondents.

Respectfully submitted,

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Brian Olney
Counsel of Record
Hadsell Stormer Renick & Dai
128 N. Fair Oaks Ave.
Pasadena, CA 91103
Tel. 626-585-9600
bolney@hadsellstormer.com

William J. Aceves
California Western School of Law
225 Cedar Street
San Diego, CA 92101

Counsel for *Amici Curiae*