

**Dr. J.P. London**

Chairman of the Board  
President  
Chief Executive Officer

February 28, 2007

Ms. Danielle Brian  
Executive Director  
Project on Government Oversight  
666 11th Street, NW Suite 900  
Washington DC 20001-4542

**Re: The Matter of Ethics and Integrity**

Dear Ms. Brian,

We regret to say that the Project on Government Oversight's (POGO) February 5, 2007 news release entitled "GSA Hired CACI to Process Suspension and Debarment Cases" misrepresents aspects of CACI's work for the General Services Administration (GSA) and seems to disparage the company. In hopes that this was not POGO's intention, we are providing you with pertinent facts to correct these errors.

The basis for POGO's criticism in this news release seems to be that CACI was once "considered for suspension/debarment from federal contracts itself." In May of 2004, the company was notified by GSA's Suspension and Debarment Official that CACI was under review for its contract that included interrogator support services provided in Iraq. Just two months later, on July 7, 2004, after CACI's written response and hearing with the GSA's suspension and debarment officials, GSA concluded that no action needed to be taken and deemed CACI a responsible company. GSA's positive conclusions about CACI were widely reported in the media and prominently displayed on CACI's website.

In June 2004, according to press reports you even believed that CACI was being unfairly targeted when you stated that GSA's examination of CACI was a case of "political opportunism" because CACI "happens to be the news of the day."<sup>1</sup> Furthermore, you declared, "I don't think CACI has done anything to merit debarment, but the debarment and suspension systems are often used for the wrong reasons."<sup>2</sup> Yet POGO's February 2007 news release labels CACI as "infamous." Why was such a derogatory term applied to our company?

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<sup>1</sup> Abby Bowles, "CACI Under Investigation by GSA, DOD, Interior for Role in Iraqi Prisoner Abuse," *Federal Contract Report*, June 1, 2004.

<sup>2</sup> Matthew French, "CACI Caught in Iraqi Prison Scandal," *Federal Computer Week*, June 7, 2004.

Since you were previously forthcoming in providing an objective view of CACI's situation and its potential malignment by the media from political pressures, we would appreciate your input on the recent matter with your Mr. Amey. Please advise him of these views you expressed publicly.

In CACI's 45-year history of work with the U.S. government, we have established a record of loyal support and reliable performance that publicly speaks for itself. Had POGO looked at its own Federal Contractor Misconduct Database, you would have found only one minor entry on CACI – a 1997 administrative error with Export Administration Regulations that was settled with a small fine, which we further clarified as recently as March 2006. Even by your standards, our company has an excellent record, particularly in comparison to many other companies in your database that have proven significant transgressions.

POGO also states that CACI's contract with GSA "potentially placed it in the extraordinary position of having unfair access to sensitive data from its competitors as well as providing the company the opportunity to undermine the standing of future competitors for government contracts." Is POGO insinuating that our CACI consultants would willingly engage in unethical, even illegal behavior? If so, such conjecture is baseless, libelous, and lacks any proof.

CACI's commitment to ethics is highlighted by its decades-long corporate ethics program that every CACI employee is required to complete. Moreover, CACI's employment agreement contains a section where employees agree not to "disclose, publish or use, or knowingly permit anyone else to disclose, publish or use, any proprietary information or trade secrets." Our integrity and our reputation for high ethical standards are well known in our market. In fact, Human Resources Leadership Awards of Greater Washington created an Ethics in Business Award in my honor in 2002, over two years *before* any GSA suspension issue arose.

CACI has not entered the debate over what work is 'inherently governmental in nature' because those issues are for the government to decide. We have simply responded to work requests and task requirements set out by the GSA and the U.S. government for work on competitively-awarded government contracts. The GSA contract, as shown on your website, was specifically drawn only for "processing the backlog" of cases and in no way were CACI employees involved in or contracted to provide any decision-making services. We would note, however, that we do not believe this short-term administrative support effort is "...another example of the government being run by contractors..." as stated by POGO's General Counsel, Scott Amey. Public comment by Mr. Amey to the media about this matter is questionable in itself. But to overstate the situation by representing that CACI and GSA are materially culpable for any work beyond what is contracted is irresponsible and inflammatory in our view.

In fact, in an August 2006 email provided in a link from your February 5<sup>th</sup> press release, a GSA spokesman tells Mr. Amey that while they had temporarily contracted out review and analysis work to clear a backlog during staffing shortages and that "you could say

that GSA recognizes our suspension/debarment authority is indeed inherently governmental,” GSA had “retained decision authority throughout this process by which [GSA] addressed [their] backlog, that the contract help was only to help [GSA] complete the necessary review and analysis preparatory to [GSA] exercising [their] decision authority and responsibility.”

POGO’s release has also grossly misrepresented the costs of this contract. You claim your “investigation” *pegged* the costs at \$343,000. Unfortunately, this investigation failed to contact CACI. Had POGO asked, you would have learned that the *actual cost* of this project was approximately \$150,000 – less than half of what you claimed. Your release further suggests that CACI’s rate for contract specialists is excessive. CACI’s rates are set according to the competitive marketplace for well-qualified and experienced specialists for important, quick turnaround projects. Unfortunately, it seems POGO made no attempt to benchmark these rates within the contractor arena or compare them to the costs of using comparable government employees and what to do with and how to pay for them once the project was completed.

Furthermore, POGO claims that CACI may have no experience in the suspension and debarment area. Companies do not have suspension and debarment departments or services; they can only be the focus of such proceedings. As stated in the documents on your website, the contract positions required IT systems, business process engineering, analytical and communication skills. Experience with suspension and debarment were not required by the contract. The individuals CACI provided for this work were highly experienced in these areas and fully capable of providing the professional, technical, and ethical support services requested by the GSA. Specifically, the individuals placed on this contract had a combined 100 years of contracting experience.

While CACI appreciates POGO’s mission of ensuring accountability and honesty in government spending, the timing and intentions of your news release seem suspect. Was it your intent to harm CACI and the GSA on purpose, for such an innocuous task? By your own published records, POGO received sufficient answers from GSA on this matter in the fall of 2006 (although it seems CACI was never contacted on this matter). Yet POGO attacks CACI months later in February 2007 publicly and in the media. We do not understand your unwarranted actions. Why have you attacked CACI and its employees who have given their best efforts and acted in good faith to support the GSA?

GSA is one of CACI’s valued respected government clients and we have always endeavored to be of good service and provide high quality support to that institution. With all good intentions and with professional accountability, CACI responded to GSA’s short-term, peak-workload requirement to provide professional expertise in contract administration and related support services. We will continue to provide our superior services to GSA and all of our clients.

I request that POGO make every effort to correct these errors and set the record straight. This would include a full public retraction of your news release and for Scott Amey to cease making false and reckless statements. We would also request you explain to us

why you attacked our company and our people without even so much as calling us.  
Please contact me for further discussion and please visit our website, [www.caci.com](http://www.caci.com).

As you must surely realize, this is now a matter of ethics and integrity – that of POGO  
and its public behavior and representations in the media.

Sincerely,

A handwritten signature in black ink, appearing to read "J.P. London", with a long, sweeping flourish extending to the right.

J.P. London

cc: Scott Amey, General Counsel, Project on Government Oversight