

JUST MEANS FOR JUST ENDS

THE CASE FOR HUMAN RESOURCE EXPLOITATION (NEE TORTURE)

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“You asked me once,’ said O’Brien, ‘what was in Room 101. I told you that you knew the answer already. Everyone knows it. The thing that is in Room 101 is the worst thing in the world’...

‘The worst thing in the world...varies from individual to individual. It may be burial alive, or death by fire, or by drowning, or by impalement, or fifty other deaths. There are cases where it is some quite trivial thing, not even fatal’...

‘In your case...the worst thing in the world happens to be rats’...

‘By itself,’ he said, ‘pain is not always enough. There are occasions when a human being will stand out against pain, even to the point of death. But for everyone there is something unendurable—something that cannot be contemplated. Courage and cowardice are not involved. If you are falling from a height it is not cowardly to clutch at a rope. If you have come from deep water it is not cowardly to fill your lungs with air. It is merely an instinct, which cannot be disobeyed. It is the same with the rats. For you, they are unendurable. They are a form of pressure that you cannot withstand, even if you wished to. You will do what is required of you.’”²

The theory of “just war” states that certain preconditions are necessary to morally and legitimately wage, and concomitantly justify, war. The presumption is firmly rooted in both theoretical and historical bases.³ The doctrine of *jus ad bellum* requires, among other things, the presence of a just cause, a reasonable chance of success, the legitimacy of the participating nations, and the proportionality of the response in order to properly consummate belligerent acts. In addition, the principle of *jus in bello* obliges combatants to utilize just and measured means in the prosecution of war itself.⁴ These considerations have been codified in various historical agreements designed to systematize the form and function of armed conflict. For instance, national and international laws relating to the proper treatment of civilians, battlefield detainees, and captured soldiers are a specie of the historical justification for war—i.e., the Geneva Convention with respect to the Treatment of Prisoners of War, the U.N. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, and the constitutional guarantees contained in the Bill of Rights of the U.S. Constitution, to name a few.⁵ These rules of conduct bring certainty to the operation of war, thereby stabilizing the eccentricities of geopolitical intrigue, and the dynamism inherent in hostile exchange.

These concepts would appear elementary, at least to nations that share these ideals. To be sure, the appeal of just war theory rests on the assumption that the presence of universal rules of engagement will erase, or at least minimize, protracted and unreasonable forms of combat. But a problem arises when one of the participants does not subscribe to the commands of just war doctrine. Such a situation commonly exists when belligerents vary demonstrably due to differing political, spiritual, cultural, racial, or linguistic conventions. In this set of circumstances, there is no universal “vocabulary” for the participants to follow in the prosecution of hostile activities; and even if such lexis is acknowledged, that non-participating combatant might forsake its use, and pursue terms of war contrary to conventional doctrine. For instance, during the age of colonialism, pitched battles were fought between European and native populations due to the fundamental difference and lack of familiarity between the combatants. Quite often, this dissimilarity bred cruel, excessive, and unpredictable forms of warfare, unfettered by the presence of justice and proportionality.⁶ Indeed, the lack of a common vocabulary has the potential of introducing an additional layer of disorder to an already

unstable condition, thus seriously undermining the theoretical and procedural mechanisms of just war theory.

The problem of lack of a familiar lexicon is exacerbated when the contestants experience an asymmetrical relationship with one another. The qualitative imbalance between the participants, because of the overwhelming size, ability, or force of the dominant actor, presents a challenge to the principle of just war. In this instance, the subordinate actor might appeal to unconventional forms of warfare to compensate for the situational or positional inequality. Such a condition frequently exists when properly constituted nations or states—i.e., the United States of America, European countries, and other first world countries—stand against incomplete and unreasonable combatants—i.e., terrorist groups such as Al-Qaeda, ETA, Al-Aqsa Brigade, Islamic Jihad, Red Army, Hamas, Real I.R.A., etc. Terrorism is, by definition, diametrically opposed to the dictates of just war.⁷ Terrorists do not occupy the same political, economic, or military status as the conventional state. Nor do they share distinct borders, similar goals, or engage in conventional forms of diplomacy. And, most importantly, they do not refrain from the use of immoral or unjust means of war. Quite the contrary, the use of such insidious tactics are the primary weapons of terrorists.⁸ They seek to maximize the impact of violence against civilians in order to transmit a larger political message. For the terrorist, the calculus is simple. Since the successful manufacture of horror and shock is directly proportional to the scale of the harm imposed on the target audience, a succession of escalating violence accompanies T-acts—e.g., the greater the severity of the T-act, the more terror is generated, and the greater the effect of the underlying political message.

Faced with so implacable a foe, it would appear that the just state is faced with a proverbial prisoner's dilemma.⁹ For while the concepts of national defense and self-preservation demand that action be taken to repel the terrorist threat, the precepts of just war also require that hostilities be waged "above board." But what response is necessary and justified in order to repel the terrorist threat? And, how can the just state successfully negotiate these seemingly opposing considerations?

The state can choose between one of three options. The first is to ignore the campaign of terror and vainly hope—like the desperate ostrich who stick's his head in the sand—that terrorists will either cease, tire, or shift the focus of their activities.¹⁰ This choice, however, is fraught with difficulties, and disregards the predatory nature of

modern terrorism. Rather than terminate future T-acts, the terrorist will interpret the passivity of the receiving player as weakness. This invites an explosion, and not a decrease, in the amount of future terrorist activity. While the motives of the state would remain pure, the goal of repelling the terrorist threat would be an utter failure. Furthermore, the inaction of the just nation could be interpreted as willful ignorance, negligence, or outright criminality. The state has a duty to protect the public. This alternative would utterly fail to fulfill that mission. Hence sitting idly by and doing nothing is not a valid option.

The second choice is to descend to the level of the terrorist, and meet their levels of depravity and brute force with similar methods of cruelty. Likewise, this selection, while moderately successful in the short term, could work to damage the long-term goal of effective terrorist intervention. But more significantly, this scheme could have the unfortunate side effect of multiplying the amount of future T-activity—something I refer to as a T-multiplier.¹¹ Terrorists would assume a siege mentality and commence even more extreme levels of violence. This would work to undermine not only the moral standing of the state in the community of nations, but the goal of effective terrorist interdiction as well. Consequently, this is not a practical option either.

The question now becomes: how can a just state effectively prosecute a war against terrorism, while still holding true to the precepts of the just war? The answer is that the state must develop and utilize innovative, and rational, methods of war to neutralize the terrorist threat. This leads directly to the third and final alternative. The conventional battlefield obviously presents no moral problems of engagement, as classical methods of warfare are entirely consistent with just war doctrine. But terrorists usually operate behind enemy lines, and are virtually indistinguishable from innocent segments of host populations. Terrorists work clandestinely, and utilize unconventional forms of warfare. Sometimes, terrorism might manifest itself in a subtle transfer of funds or the procurement of fertilizer for a weapon of mass destruction; or it might be considerably more blunt in the form of a suicide bomb. Indeed, the methods and types of terror defy easy explanation.

Given the wide spectrum of individual terrorists, and the pervasiveness of the terrorist phenomenon, individual T-soldiers—as distinguished from T-organizations and states who sponsor terrorism—must be dealt on a case-by-case basis. For regardless of the tool which the terrorist hand wields—i.e., a bomb, plane, gun, car,

etc.—it is the individual actor who must be confronted. To be sure, the primary weapon of the terrorist is his very own body. *He* will sacrifice himself in a manner calculated to achieve the desired politico-religious goals of the given organization or state. Accordingly, he must be exploited as a valuable resource. When the individual terrorist is identified and captured, he must be manipulated in such a way as to prevent the planning, organization, and performance of present and future hostile acts.

Simply put, Human Resource Exploitation (HRE) is required.¹² For those unfamiliar with the term, HRE is the modern variant of torture. Torture, however, is a clumsy term. It is a remnant of a more cruel and superstitious world, where its application was frequently used to promote questionable ends.¹³ The “Rack,” “Iron Maiden,” and “Spanish Donkey,” apart from being cruel and excessive in and of themselves, were not effective in curing the secular concerns of the state, so much as gratuitously punishing the enemy du jour.¹⁴ And in those instances where it was used to promote worldly interests, other factors, such as emotion, personal gain, and whim, dominated its use. Rather than being systematized into a rational process furthering the goals, expansion, and development of the just state in the face of overwhelming strain, torture has followed a—pardon the pun—tortuous path. Tracing the history of torture, however, is instructive.

The first recorded use of state sponsored torture was by the Egyptians in the 14th century B.C. Ramses II sanctioned the torture of “some poor unfortunate prisoners in an attempt to learn the dispositions of enemy forces during the Hittite invasion of Egypt.”¹⁵ Normally, however, its use was reserved for slaves and foreigners; enemies caught on the battlefield would be executed outright. When applied, its methods were undefined and harsh. In the 5th century B.C., the Greeks were reluctant to torture free citizens, so outsiders and servants were substituted for their masters in civil and criminal affairs. A *basanistes* (a civic torturer) was utilized to perform the task, as it was considered beneath “free men to indulge in such practices.”¹⁶ But crimes against the state would be met with strict penalties, even for full-fledged citizens. In the 1st century A.D., torture was promulgated under Roman law. It was used as a political, penological, and religious tool to extract information, force confessions, and punish individuals. But the Caesars mainly used it as a tool of intimidation, and to consolidate personal power.¹⁷ In Europe, during the Middle Ages, torture was used as a quasi-judicial/religious device to obtain

confessions and punish heretics, thereby purifying society of evil. Its use continued into the 19th century in the New World, until it was abandoned.¹⁸ Presently, torture is outlawed under the terms of the Geneva and Hague conventions, but it is still used in many parts of the world.

Given that torture was used by questionable regimes for less than noble ends, its use is not to be considered just, or in furtherance of the rational development of stable, democratic, and moral societies. In addition, the practical and theoretical disadvantages of torture, and its outlawed status, undermine its feasibility. Moreover, torture was not only unjust in principle, but in operation as well. It is for these reasons that torture cannot be considered a proper means of effective information extraction, intelligence gathering, or terrorist prevention.

Throughout history, torture, in whatever form and for whatever end, was prone to various drawbacks. First, the methods employed are contrary to the values of the just state. Whether the goal of torture was punishment, intelligence gathering, or the prevention of criminal acts, the excessiveness, or lack of proportionality, of the torture regime negates its practicability. Second, when torture was used for questionable ends, the process was corrupted *ab initio*, irrespective of the methods in use. Third, the irrational and brutish nature of the methods employed, and its position at the periphery of the state apparatus, promoted unprofessionalism and a lack of uniformity in operation and structure.

“Torture is senseless violence born in fear. The purpose of it is to force from *one* tongue, amid its screams and its vomiting up of blood, the secret of *everything*. Senseless violence: whether the victim talks or whether he dies under agony, the secret that he cannot tell is always somewhere else and out of reach. It is the executioner who becomes Sisyphus. If he puts *the question* at all, he will have to continue forever.”¹⁹

Fourth, the value of information obtained as a result of torture was often suspect. In fact, the greater the amount of force applied, the more unreliable the value of the information. Therefore, brute forms of torture are inherently unreliable.

Irregardless of the difficulties of the torture option, managing the war on terror is not necessarily insuperable. It is my belief that a modern—and highly modified—form of torture can effectively meet the

challenges of the 21st century terrorist battlefield. This is where HRE come into play. HRE, as this author envisions it, is a scientifically organized and applied science. It is to be utilized by just nations, or their proxies, for ends consistent with the prosecution of the war on terror, and the preservation of the state in the midst of intense circumstances—i.e., T-acts calculated to demoralize the military, social, political, or economic well-being of the state, the classic “Ticking Time Bomb” case, and direct assaults against the citizenry. HRE is used to gather information, extract intelligence, or aid in the furtherance of specific secular objectives—namely the defeat of T-acts in the aforementioned circumstances. Furthermore, the means employed should be measured and proportional to those ends—in a word, “just.”

HRE, therefore, is defined as follows:

Human Resource Exploitation (HRE), with respect to its applicability in the prevention, or in the acquisition of intelligence calculated to lead to the prevention of present or future terrorist acts, is the intentional infliction of severe, moderate, or mild coercive, persuasive, or intimidating psychological or psychic force, pressure, or duress for the express purpose of extracting, gleaning, securing, or otherwise obtaining necessary, or thought to be necessary, information, property, data, facts, intelligence, or any other such needed material, in whatever form, which directly or indirectly leads to the prevention of present or future terrorist acts.

HRE does not embrace the use of brute forms of physical torture—i.e., the wheel, drawing and quartering, electrocution, beheading, severe beating, rape, etc.—as those methods are qualitatively unjust, and impede the goal of effective information extraction.²⁰ Indeed, recent developments in pharmacology, psychology, hypnosis, and the art of interrogation make physical forms of torture wholly unnecessary. The primary weapons of HRE, therefore, are psychological forms of pressure and duress.²¹ The terror suspect would be placed in isolation, stripped of his identity, deprived of routines, and finally, psychologically manipulated and interrogated in such a way as to provide useful intelligence.²² If the suspect proves uncooperative, he could be induced to render information through so-called truth drugs—i.e., scopolamine, sodium amytal, and

thiopental, known commonly as sodium pentothal (the original truth serum).²³

The argument for HRE is rooted in both morality and necessity. Rather than permit unconventional methods of torture to dominate the field, the adoption of standardized HRE techniques would bring clarity to terrorist interrogation. This would minimize the baser aspects which dominated ancient forms of torture. The state would have a guarantee of legitimacy, while at the same the desired information could be obtained. As a matter of utility, the state has an interest in self-defense and national preservation when faced with external threats. In the case of an organization or individual who seeks nothing less than the total annihilation of the just state, it is not only fitting that action be taken to repel the threat, it is required.²⁴ And since the methods utilized would be measured, proportional, and standardized, effective intelligence gathering, could be achieved, while still holding true to just war doctrine.

One aspect of HRE deserves mention, as it has attracted a great deal of press lately. That involves the ubiquitous “Ticking Time Bomb” case. Alan Dershowitz cites it as proof of the necessity of HRE in more than one article.²⁵ Surely, his tacit admission of the applicability of HRE, even under certain circumstances, is cause enough for serious consideration. The scenario can be stated thusly: suppose reliable intelligence reveals the presence of a bomb that will detonate very shortly and cause untold human and physical destruction. Suppose also that a suspect is apprehended who possesses clear information as to the type, location, and/or disarming protocols of the particular weapon. Let us presume furthermore that sound methods of HRE would successfully disgorge the necessary information from the subject, thereby diverting the danger.²⁶ In this case, HRE would not only be morally acceptable, it would be a practical necessity. The security of the state in the face of overwhelming circumstances demands that immediate action be taken to ensure the safety of the citizenry. So long as the methods employed do not amount to gross human rights violations, the state is entirely justified in applying HRE when and where applicable.

Even though Dershowitz endorses the use of HRE, he would prefer it to be administered under the auspices of the judiciary as opposed to the executive—with prosecutors appealing to magistrates for, what he referred to as, “torture warrants.”²⁷ While the dispute I have with Mr. Dershowitz merely relates to procedural matters, it warrants a brief review. Dershowitz’ assumption is based on the role of

the legal system as overseer of the affairs of the federal government, and guarantor of the constitutional rights and liberties of the people. He believes that if HRE is to be used, it should be monitored by the courts.²⁸ This view, however, is seriously misguided. This scheme would not only pervert the jurisprudential functioning of the courts, but the law as well. The correct branch of government to administer HRE would be the executive.

The criminal justice system was never conceived of as a universal forum for the wide spectrum of facts, cases, and occurrences, arising in the modern world. The criminal courts were designed for the narrow function of managing specified controversies arising under particular laws. The reach of the prescribed laws of the United States is explicitly partitioned to various branches and levels of government. The legislature writes laws, the executive enforces laws, and the judiciary says what the law is. The legislature, for instance, is empowered to determine and fix the compensation for its members. The courts would not rule on the constitutionality of these affairs, as the matter is a political question. Similarly, the ability of the executive to manage affairs peculiar to its mission are clearly within the province of that branch, and hence beyond the review of the courts. Besides, involving the courts would take too much time, air the matter in the public, and inflame the compatriots of terrorist suspects to seek reprisals against the U.S. This would actually work to hinder effective information extraction and terrorist prevention. Thus the executive branch is in a unique position to administer HRE under its control, direction, and management. If, however, Dershowitz is still reluctant, extensive guidelines and legislative oversight could be put in place to ensure the fair and reasonable application of HRE. Consequently, possible deleterious side effects could be minimized, while at the same time the pressing need for solutions to the war on terror could be applied.

A modified form of the techniques used by Israel offers perhaps the most effective regime for HRE. The Israelis, terminally under terrorist siege, have concluded that the prevention of terrorist acts is virtually unattainable without a program of interrogation. The state endorses the utilization of nonviolent forms of psychological duress through extensive interrogation, including the use of ploys, bluffs, and trickery.²⁹ It also sanctions the use of moderate physical pressure. This, however, is unnecessary. As mentioned above, effective information extraction can and will achieve the desired ends in a just manner.

Of course the notion of utilizing even these antiseptic methods of HRE might appear barbaric to some; but the amount of debate generated in the wake of 9/11 at least tacitly acknowledges its viability.³⁰ Indeed, many of these observers advocate the use of HRE in specific instances. At any rate, once the U.S. government adopts such a policy, it could be subjected to institutional oversight, and hence a level of control over HRE techniques could be established. The immediacy of the terrorist dilemma demands that HRE be drafted, adopted, and applied on a timely basis. Then, the government will be able to more effectively protect the citizenry, and defeat the scourge of terrorism wherever it may be, and in whatever form it may take.

NOTES

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² Orwell, George. *Nineteen Eighty-Four*, (New York, N.Y.: Harcourt, Brace & World, Inc., 1949), 287.

³ Moseley, Alex. "Just War Theory," *The Internet Encyclopedia of Philosophy*, available from <http://www.utm.edu/research/iep/j/justwar.htm>, accessed on March 15, 2002.

⁴ Holmes, Robert L. *On War and Morality*, (Princeton, N.J.: Princeton University Press, 1989).

⁵ Geneva Convention with respect to the Treatment of Prisoners of War. Adopted on August 12, 1949 by the Diplomatic Conference for the Establishment of International Conventions for the Protection of Victims of War, available from <http://www.unhchr.ch/html/menu3/b/92.htm>, accessed on March 15, 2002; United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. Adopted on December 10, 1984 by the General Assembly, resolution 39/46, available from http://www.unhchr.ch/html/menu3/b/h_cat39.htm, accessed on March 15, 2002; and, the Bill of Rights of the U.S. Constitution. Ratified on December 15, 1791 by the several states. Lieberman, Jethro K. "Bill of Rights," *Microsoft Encarta Encyclopedia 2000*, [CD-ROM] (Redmond, W.A.: Microsoft, 1999).

⁶ Spodek, Howard. *The World's History: Volume II: Since 1100*, (Upper Saddle River, N.J.: Prentice Hall, 2001), 409-414, 420, 456-470.

⁷ Terrorism is defined as "political killing rendered illegitimate...either by the availability of peaceful alternatives or by its targeting of innocent civilians...[or] low-

level warfare directed, contrary to the principles of the just war, against harmless civilians, often owing to the terrorists' lack of adequate resources to defeat military force." *The Oxford Companion to Philosophy*, Ted Honderich, ed., (Oxford, England: Oxford University Press, 1995), s.v. "violence, political."

⁸ "America Responds To Terrorism: What Is Terrorism?," *The Constitutional Rights Foundation*, available from http://www.crf-usa.org/terror/What_Is_Terrorism_rev.htm, accessed on March 15, 2002.

⁹ A prisoner's dilemma is defined as "a...situation in which prisoners are offered various deals and prospects of punishment...[each of which is] against his interest and therefore irrational." *Ibid.*, s.v. "prisoner's dilemma."

¹⁰ The passive recipient of T-acts makes a choice, either consciously or subconsciously, which can be reduced into the following equation: the "cost" of not responding to T-acts (C_{NR}) is less than ($<$) the "cost" of responding to T-acts (C_R), where the "cost" embodies the cumulative total of direct and indirect physical, political, economic, and psychic costs— $C_{NR} < C_R$.

¹¹ A T-multiplier is in effect when: the quantity of T-acts generated by efforts designed to resist, repel, defeat, and otherwise prevent terrorism (QT_P) are greater than ($>$) the amount of terror activity realized by coordinate active or passive efforts (QT_I), thus realizing a net increase in the amount of T-acts— $QT_P > QT_I$.

¹² I have borrowed the term, "Human Resource Exploitation," from a declassified S.A.S./S.O.G./G.B. handbook entitled, *Human Resource Exploitation Training Manual—1983*. The manual was distributed to Latin American nations participating in the School of the Americas training program at Fort Benning, Georgia, U.S.A., available from <http://www.gwu.edu/~nsarchiv/NSAEBB/NSAEBB27/02-01.htm>, accessed on March 15, 2002.

¹³ Innes, Brian. *The History of Torture*, (New York, N.Y.: St. Martin's Press, 1998), 12-51, 66-121.

¹⁴ "Historical Methods of Torture and Execution," available from <http://www.theelectricchair.com//torture.htm>, accessed on March 15, 2002.

¹⁵ Innes, *The History of Torture*, 13.

¹⁶ *Ibid.*, 12-21.

¹⁷ *Ibid.*

¹⁸ "Torture in Europe Through the Ages," available from <http://www.augustana.edu/academ/history/witchcraft/tor6.htm>, accessed on March 15, 2002.

¹⁹ Sartre, Jean-Paul. Henri Alleg's *The Question*, trans. John Calder, (London, 1958), 23, quoted in Page DuBois' *Torture and Truth*, (New York: Routledge, 1991), 5.

²⁰ Alexander Cockburn has commented that once "we" go down the road of HRE that "we," as a nation and a people, will become legally and morally corrupted, thereby losing our status as a just nation. I totally disagree. The U.S. also employs a policy of capital punishment which is handled efficiently and judiciously through the use of institutional safeguards—i.e., mandatory appeals, court appointed attorneys and experts, etc. Individuals subjected to HRE will be accorded similar legal and moral respect, and the high professional standards of the U.S. government. Consequently, no negative label need attach itself to the use of HRE. Alexander Cockburn's "The Wide World of Torture," *The Nation*, 273 (Nov. 26, 2001) 17: 10.

²¹ "Experience indicates that the use of force is not necessary to gain cooperation of sources. Use of force is a poor technique, yields unreliable results, may damage subsequent collection efforts, and can induce the source to say what he thinks the

interrogator wants to hear...However, the use of force is not to be confused with psychological ploys, verbal trickery, or other nonviolent...ruses employed by the interrogator in the successful interrogation of reticent or uncooperative sources.” *Human Resource Exploitation Training Manual*—1983, available from <http://www.gwu.edu/~nsarchiv/NSAEBB/NSAEBB27/02-05.htm>, accessed on March 15, 2002.

²² *Ibid.*

²³ Innes, *The History of Torture*, 179.

²⁴ Holmes, *On War and Morality*.

²⁵ Dershowitz, Alan. “Want To Torture? Get A Warrant,” *The San Francisco Chronicle*, September 22, 2002, “Is There A Torturous Road To Justice?”, *Los Angeles Times: latimes.com*, November 8, 2002, available from <http://ontology.buffalo.edu/smith//courses01/rtrw/Dershowitz.htm>, accessed on March 15, 2002, “Let America Take Its Cues From Israel Regarding Torture,” *Jewish World Review*, January 30, 2002, available from <http://www.jewishworldreview.com/0102/torture.asp>, accessed on March 15, 2002.

²⁶ Levin, Michael. *The Case For Torture*, available from <http://ontology.buffalo.edu/smith//courses01/rtrw/levin.htm>, accessed on March 15, 2002.

²⁷ Silvergate, Harvey A. “Torture Warrants?”, *The Phoenix.com*, available from <http://www.bostonphoenix.com>, accessed on March 15, 2002.

²⁸ MSNBC’s Alan Keyes *Is Making Sense*, “Torture,” Alan Keyes interview with Alan Dershowitz, March 4, 2002.

²⁹ For a further discussion of Israeli interrogation methods, See Melissa L. Clark’s “Israel’s High Court Of Justice Ruling On The General Security Service Use of ‘Moderate Physical Pressure,’” 11 *Ind. Int’l & Comp. L. Rev.* 145, 151, and for a general discussion of torture itself See Winfried Brugger’s “May Government Ever Use Torture? Two Responses From German Law,” 48 *Am. J. Comp. L.* 661, and, Michael O’Boyle’s “Torture and Emergency Powers Under the European Convention on Human Rights,” *American Journal of International Law*, 71 (Oct. 1977) 4: 674-706.

³⁰ See, for example, James R. Petersen’s “Thinking About Torture: Is it Time to Get Out the Rubber Hoses?”, *Playboy*, 49 (March 2002) 3: 50-51, Danielle Haraburda’s “What Are We Willing To Sacrifice For Revenge?”, *U-Wire Today—The Nation’s College Newspaper*, available from <http://www.uwiretoday.com/columns012502010.html>, accessed on March 15, 2002, Steve Rendell’s “Pro-Pain Pundits: Torture Advocates Defy U.S., International Law,” *EXTRA!*, January/February 2002, available from <http://www.fair.org/extra/0201/pro-pain.html>, accessed on March 15, 2002, Alisa Solomon’s “The Case Against Torture,” *The Village Voice*, 46 (Dec. 4, 2001) 48: 56-57, “Torture Today,” *America*, 185 (Nov. 19, 2001) 16: 3, Flore de Preneuf’s “Time To Torture?”, *Salon.com*, available from http://www.salon.com/news/feature/2001/11/16/brutality/index_np.html, accessed on March 15, 2002, Jonathan Alter’s “Time To Think About Torture,” *Newsweek*, 138 (Nov. 5, 2001) 19: 45, Alexander Cockburn’s “FBI Eyes Torture,” *Out of Bounds Magazine: Counterpunch*, available from <http://www.counterpunch.org/torture1.html>, accessed on March 15, 2002, Toby Harnden’s “CIA Can Get Back To Its Dirty Tricks,” *Sydney Morning Herald*, October 23, 2001, available from <http://www.smh.com.au/news/0110/23/text/world5.html>, accessed on March 15, 2002.