

**AFFIDAVIT OF ROBERT BOYER**

**STATE OF GEORGIA**

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**COUNTY OF GWINNETT**

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On this day, Robert Boyer, appeared before me, the undersigned notary public and after I administered an oath to him/her, upon his/her oath, he/she said:

"My name is Robert Boyer. I am over the age of 18 and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

I worked for KBR (Kellogg, Brown & Root) as a recovery mechanic, from October 2004 to May 2006, out of Camp Taji, which was located 32 miles north of Baghdad.

During the time that I was there, I witnessed an atmosphere of "quid pro quo" sexual favors traded for favorable job conditions. I witnessed KBR managers propositioning and offering third country nationals (TCNs) to work in the laundry during the day time (slow time) in return for oral sex.

I have witnessed KBR managers arrange meetings at their living quarters in exchange for the more advantageous jobs (i.e. handing out towels at the MWR).

There was a very obvious "boys will be boys" mentality among the supervisors and managers which permeated throughout the company.

When I first arrived in Iraq, I was in Blad (just outside Baghdad), in the temporary housing containers known as "cheese boxes." These were shipping containers that were approximately 12' x 20' in dimension, with a framed in door and a window. I was "contract contingent" for Taji. However, some managers attempted to keep me in Blad because I was needed there. This was not approved.

I was present when a KBR manager approached an attractive woman in Blad and broke her contract contingency to keep her at Blad. The reasons were very obvious - and related to her physical appearance and his sexual desire. He said "I'm going to break her contract, and make her stay here." Although I do not recall his name, I know that he was in charge of billeting and administration.

KBR managers are insistent upon getting photographs of you before you arrived at your work location. If you were "liked" (i.e. young, attractive, female) the managers would keep you, but would find new jobs whether you were qualified or not.

One of my project managers, James, was a security executive with Halliburton in Houston. He was "chasing" a lot of women. He had a TCN woman named Rose who would arrive at night and stay in his quarters. She had a key and everything.

One of KBR's contractors, Lear Siegler, (LSI), a logistics partner of KBR's was on the same site. On one occasion I walked in on an administrative assistance performing oral sex on her boss.

The work environment is so hostile that you cannot complain about anything without risking severe

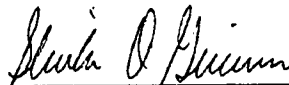


consequences, including termination. The president of the company put out bulletins about a hostile work environment, but the environment was unspoken and unwritten."

Further affiant sayeth not

  
Robert Boyer, AFFIANT

SWORN TO AND SUBSCRIBED before me on the 14TH day of JANUARY  
2008



NOTARY PUBLIC IN AND FOR THE STATE OF GEORGIA  
(SEAL)

Notary Public, Henry County, Georgia  
My commission Expires Dec 10, 2008

