

* Xuncax v. Gramajo (D.Mass.1995)--
"plaintiffs have convincingly demonstrated that, at a minimum, Gramajo was aware of and supported widespread acts of brutality committed by personnel under his command resulting in thousands of civilian deaths."

* Yugoslav War Crimes Tribunal Statute, Article 7(3): "The fact that [a criminal act] was committed by a subordinate does not relieve his superior of criminal responsibility if he knew or had reason to know that the subordinate was about to commit such acts or had done so and the superior failed to take the necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof."

* Estate of Marcos (9th Cir. 1996):
Upheld jury instruction that Marcos was responsible if (1) he directed, ordered, conspired with, or aided the military in torture, summary execution, and disappearance, or (2) he knew of such conduct by the military and failed to use his power to prevent it.