

**Bradley Jenkins
Capital Area Immigrants' Rights Coalition
1612 K Street NW Suite 204
Washington, DC 20006**

DETAINED

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ARLINGTON, VA**

_____)
In the Matter of:)
)
XXXX XXXX XXXX) **File No.: A**
)
In removal proceedings)
_____)

Immigration Judge Paul Schmidt

Next Hearing: April 13, 2009 at 1:00 PM

**RESPONDENT'S PRE-HEARING BRIEF IN SUPPORT OF
DEFERRAL OF REMOVAL UNDER THE CONVENTION AGAINST TORTURE**

STATEMENT OF FACTS

XXXX XXXX XXXX is a nineteen year old lawful permanent resident who was born in Pakistan under the protection of the United Nations High Commissioner for Refugees. He was born to an Iraqi mother and an Iranian father. Although the Department of Homeland Security (DHS) claims that Mr. XXXX is a native of Pakistan, his birth in Pakistan under the protection of UNHCR confers on him no legal Pakistani status. DHS also claims that he is a citizen of Iraq, however Mr. XXXXX has never been to Iraq and does not have Iraqi citizenship.

At age eight, Mr. XXXX entered the United States on May 9, 1998 with a refugee travel document and has lived in the United States since that time. He is currently a Lawful Permanent Resident of the United States. English is the only language he knows. See “Declaration of XXXX XXXX” Exhibit A; “Declaration of KA” Exhibit B; “Psychological Report of Dr. NM, Ph.D.” Exhibit C. Mr. XXXX’s formative years were spent in the United States. Nearly all of the meaningful cultural experiences in his life have occurred in a decidedly American cultural milieu. See “Declaration of XXXX XXXX,” Exhibit A; “Declaration of KA” Exhibit B. He does not remember much about where he lived before coming to the United States and clearly lacks an understanding of his heritage. His recollection is that he was born in ‘some place back in the Middle East.’” “Psychological Report of Dr. NM, Ph.D.” Exhibit C. Other evidence of record indicates that he has never been to Iraq. See “Declaration of KA” Exhibit B.

Further, Mr. XXXX has a long history of mental health problems. He has displayed abnormal behaviors since early childhood. See “Declaration of KA” Exhibit B. In the sixth grade, he was referred for a psychological evaluation, which described him alternatively as “withdrawn and sullen” or as “frequently becoming angry and changing moods abruptly” See “Fairfax County Public Schools Psychological Report.” Exhibit D. More recently, he has been

diagnosed with Post-Traumatic Stress Disorder (PTSD), depression, and limited developmental functioning. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C. He also displays inappropriate affect and an inability to comprehend the gravity of important situations. Id. His mental health history indicates that principal manifestations of his psychological and developmental limitations include an inability to engage in positive societal interactions, an inability to positively acclimate to new situations and a limited decision-making ability.

Mr. XXXX has been arrested in the United States on at least two occasions. When he was thirteen years old, he was arrested for petit and grand larceny and processed through the juvenile justice system in Virginia. On October 22, 2007, when he was seventeen years old, Mr. XXXX was convicted of Grand Larceny in violation of Virginia Code § 18.2-95. He was sentenced to five years confinement, of which four were suspended. As a result of his juvenile delinquency, Mr. XXXX was designated a Child in Need of Supervision in Virginia.

The DHS seeks to deport Mr. XXXX to Pakistan or Iraq, notwithstanding the fact that he is not a citizen of either country. Mr. XXXX seeks protection from removal to both countries under the CAT. Further, although the DHS does not charge Mr. XXXX with removability to Iran, Mr. XXXX nevertheless seeks protection under the CAT from removal to that country because DHS may seek to remove him to Iran as an alternative, based on his father’s Iranian citizenship status. The human rights records of Pakistan, Iraq and Iran are notorious. See “2008 Human Rights Report: Pakistan,” Exhibit E, “2008 Human Rights Report: Iran,” Exhibit K “2008 Human Rights Report: Iraq” Exhibit O. Based on Mr. XXXX’s unique circumstances and the widespread use of torture in those three countries, it is more likely than not Mr. XXXX would be tortured if returned to Pakistan, Iran or Iraq.

STATEMENT OF ISSUES

Whether Mr. XXXX, former refugee who may be vulnerable to deportation to Pakistan, Iraq or Iran is eligible for deferral of removal under Article 3 of the Convention Against Torture where his removal to these countries would more likely than not result in his being tortured by, at the instigation of, or with the consent or acquiescence of public officials in these countries.

STATEMENT OF THE BURDEN OF PROOF

Mr. XXXX must prove that it is more likely than not that he will be tortured if returned to Pakistan, Iraq, or Iran and that such torture will be instigated by or with the consent or acquiescence of a public official or other person acting in an official capacity. See 8 C.F.R. §1208.18(a)(1) (2008).

SUMMARY OF THE ARGUMENT

Article 3 of the Convention Against Torture (“CAT”) protects any individual from being removed to another country where substantial grounds exists for believing that he would be subjected to torture. It is more likely than not that Mr. XXXX, who has lived in the United States since he was eight years old, speaks only English, is highly acculturated in America, and suffers from significant psychiatric and intellectual disorders will be tortured if returned to Iran, Iraq, or Pakistan.

If removed to Iraq, Mr. XXXX will more likely than not be arrested and detained because of his seemingly aberrant behavior resulting from his psychological and developmental disabilities and because Mr. XXXX superficially meets the profile of a security threat as an eighteen year old, male with little or no connections to society. Once detained, Mr. XXXX will more likely than not be subject to torture or extra-judicial killing at the hands of government-affiliated personnel. Torture is pervasive and widespread among the various branches of the Iraqi security forces and is routinely used during the course of criminal interrogations. Once in such a

setting, Mr. XXXX's mental illness, developmental disability and limited language skills will most certainly provoke a particularly dangerous response by his interrogators.

If removed to Pakistan, Mr. XXXX will more likely than not be detained because of his seemingly aberrant behavior resulting from his psychological and developmental disabilities and because preventative detention is used as a matter of policy in Pakistan. Once detained, Mr. XXXX will more likely than not be tortured. Torture is widely used in Pakistan against detained individuals and coerced confessions are admissible in anti-terrorism courts. The government rarely takes action against those responsible for abuses. Such actions either do not arise out of any lawful sanction or are performed in such a way as to defeat the object and purpose of the Convention Against Torture.

If deported to Iran, authorities will interrogate and detain Mr. XXXX upon his deportation to Iran due to his lengthy residence in the United States, his apparent loss of status in the United States, his inability to communicate in any language other than English and his aberrant behavior resulting from his psychological and developmental disabilities. It is well documented that Iranian authorities interrogate and detain individuals who have long resided in the United States. Once detained, it is more likely than not that Mr. XXXX will be tortured on account of his aberrant behavior and because torture is used as a matter of policy to force confessions, punish crimes, and more generally abuse citizens' due process rights.

ARGUMENT

- I. **It is more likely than not that Mr. XXXX will be tortured by, at the instigation of, or with the consent or acquiescence of a public official if removed to Iraq because Iraqi authorities will arrest and detain him, and they will torture him while he is detained.**

Mr. XXXX will be tortured if removed to Iraq. Iraqi authorities will arrest, detain, and incarcerate Mr. XXXX because he is a young, mentally ill man whose behavior is seemingly suspicious. While he is incarcerated, Iraqi authorities will torture Mr. XXXX for the same reasons.

A. After removal to Iraq, Mr. XXXX will be arrested and detained because he is a mentally ill young person without significant social ties and will therefore seem suspicious.

Upon deportation to Iraq, Mr. XXXX will be thrust into a society about which he knows virtually nothing. In Matter of G-A-, the Board held that the Iranian authorities would more likely than not torture the respondent because the country conditions in Iran demonstrated a “widespread use of torture in Iran” and because the respondent had a “combination” of traits that would expose him to the scrutiny of Iranian authorities. 23 I&N at 368; see also J-E-, 23 I&N Dec. at 303 (holding that respondent did not establish that torture was widespread and pervasive in Haiti because there was only evidence of “isolated acts of torture [occurring] in Haitian detention facilities”). Much like the respondent in G-A-, Mr. XXXX is vulnerable to arrest because of a pattern of widespread arbitrary arrests and a combination of factors that will make him socially visible as he unsuccessfully attempts to adjust to Iraqi societal norms. See Matter of G-A-, supra; See also “Redacted CAT Case of Mentally-Ill Columbian Respondent” Exhibit Q (holding that the Columbian respondent in that case would be arrested because his long absence from Columbia, his mental illness, and his inability to readjust to a country where he has not lived for decades because his behavior will draw the attention of the authorities). The standard set forth in Matter of G-A-, supra and Matter of J-E-, supra, requires that, in order to carry the “more likely than not” burden, there be both a pattern of practice and specific grounds that exist to indicate that a particular respondent is personally at risk. The Board has also established that

every step along a hypothetical chain of events must be proven to be more likely than not to occur in order for the respondent to carry his burden. See Matter of J-F-F-, 23 I&N Dec. 912 (A.G. 2006). Mr. XXXX is more likely than not to be arrested and detained, as he is personally at risk for arrest pursuant to a broad practice of arbitrary and mass arrests in Iraq. His arrest is a clear eventuality given his psychiatric, intellectual, and social challenges and his membership in demographic groups already vulnerable to arrest by security forces.

a. It is more likely than not that Mr. XXXX will be arrested because Iraqi security forces exhibit a regular pattern of using arbitrary and mass arrests.

Mass arrests and indeterminate security sweeps are used as a matter of policy and are pervasive and widespread in Iraq. Mass and arbitrary arrests are a common practice among Iraqi security forces. In 2007 and 2008, there were “a number of instances of arbitrary arrest and detention.” See “2007 Human Rights Report: Iraq” Exhibit N; “2008 Human Rights Report: Iraq.” Exhibit O. From 2007 to 2008, the detainee population under Iraq government control rose from approximately 23,000 to more than 40,000. Id. The U.S. Department of State attributes this high number of detainees to “mass arrests carried out in security and military operations.” Id. Such arrests are not only common, but they are also made based solely on the slightest suspicion and without any regard for due process. According to the Department of State,

In practice, police and army personnel frequently arrested and detained suspects without judicial approval. Security sweeps sometimes were conducted throughout entire neighborhoods, and numerous persons were reportedly arrested without a warrant or probable cause. Police often failed to notify family members of the arrest or location of detention, resulting in incommunicado detention.

Id. Those arrested often spent a considerable amount of time in detention. The U.S. Department of States reports that “few detainees saw an investigative judge within the legally mandated time period. Many complained of not seeing the investigative judge

until months after arrest and detention... Lengthy detention periods without judicial action were a systemic problem.” Id.

- b. There are specific grounds that indicate that Mr. XXXX is personally at risk of arrest because he is a young, mentally ill, socially isolated, Sunni man who will therefore appear suspicious to Iraqi security forces conducting mass arrests.**

Mr. XXXX is especially vulnerable to being subject to arrest in Iraq’s security climate because of his unique situation. Because of a combination of factors working in concert, including his mental illness, his lack of cultural knowledge, his lack of fluency in Arabic and Kurdish, his lack of appropriate supervision, and his vulnerability as a young Sunni man, it is a clear eventuality that Mr. XXXX will be arrested in the security sweeps that are common in Iraq.

Mr. XXXX will be personally at risk for arrest because of his mental illness. He will not be able to form constructive relationships with his family members or others in Iraqi society and he will face an almost certain retraumatization and aggravation of his PTSD symptoms in this war-torn country. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C. His history indicates that Mr. XXXX’s PTSD manifests itself in terms of being alternately withdrawn and sullen or angry and disruptive. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C; “Fairfax County Public Schools Psychological Report” Exhibit D. The extent to which Mr. XXXX will be retraumatized will make these symptoms even more extreme and will make his social isolation nearly complete. Mr. XXXX will therefore be unable to rely on even the most basic social connections to protect him from being arrested in security sweeps. Likewise, his inability to cope with his anger and frustration at not adjusting to life in Iraq will lead to behaviors that make him appear suspicious to police and security forces.

Mr. XXXX’s risk of arrest on account of his mental illness is compounded by his lack of cultural knowledge, his lack of fluency in Arabic and Kurdish, and his lack of appropriate

supervision. These factors will both aggravate the PTSD symptoms described above and independently contribute to his arrest. His lack of cultural and language skills mean that he will not be able to follow many social norms in Iraq, contributing to his arrest. Neither will he be able to follow the orders of security forces during the course of the military operations that are common in Iraq. Finally, while Mr. XXXX does have some family that is still in Iraq, they do not speak any English and will not be able to provide appropriate supervision for Mr. XXXX. See “Declaration of KA” Exhibit B; “Psychological Report of Dr. NM, Ph.D.” Exhibit C.

In addition to the personal traits that make Mr. XXXX vulnerable to arrest, he also fits a demographic profile in Iraqi society that is particularly vulnerable to arrest: a young, Sunni man. Everyone in Mr. XXXX’s family is a Sunni Muslim, and therefore, Mr. XXXX would likely live in neighborhoods in Iraq in which arrests are more likely to occur. The U.S. Department of State reports that while Ministry of Interior-affiliated death squads targeting Sunnis have been curtailed, “the great majority” of non-coalition detainees in Iraq were Sunni. See “2008 Iraq Country Report” Exhibit O.

Therefore, specific grounds exist to indicate that Mr. XXXX is personally at great risk of being arrested by Iraqi security forces because a number of factors related to his mental illness, social isolation, and demographic groupings make his arrest a clear eventuality.

B. Mr. XXXX will more likely than not be tortured in the custody of the Iraqi government because gross, flagrant, and mass violations of human rights occur regularly in Iraq and because he will be specifically targeted because of the same factors that led to his arrest.

While Mr. XXXX is detained, he will be tortured by Iraqi police or security forces. When determining whether it is more likely than not that an applicant will be tortured, this Court must consider all “[e]vidence of gross, flagrant or mass violations of human rights within the country of removal” and any “[o]ther relevant information regarding conditions in the country of

removal.” 8 C.F.R. § 208.16(c)(3)(iii), (iv). In Matter of G-A-, the Board held that the Iranian authorities would more likely than not torture the respondent because the country conditions in Iran demonstrated a “widespread use of torture in Iran” and because the respondent had a “combination” of traits that would expose him to torture. 23 I&N at 368. Likewise in Iraq, Mr. XXXX will be tortured because of the gross, flagrant, and mass human rights violations which occur regularly in Iraq and because the combination of his mental illness-related behavior, his lack of social competence, and his status as a Sunni male.

a. Gross Flagrant, and mass violations of human rights occur regularly in Iraq as evidenced by pervasive and widespread acts of torture in Iraqi detention facilities.

Gross, flagrant, and mass violations of human rights occur in Iraq. The Board has established that torture is more likely than not to occur if “deliberately inflicted acts of torture are pervasive and widespread,” government “authorities use torture as a matter of policy,” or “meaningful international oversight or intervention is lacking.” J-E-, 23 I&N Dec. at 303 (denying respondent protection under CAT because “isolated acts of torture” are not enough to prove that respondent will more likely than not be tortured); see also G-A-, 23 I&N at 372 (holding that respondent was eligible for deferral of removal under CAT because the evidence indicated that “deliberate acts of torture [were] pervasive and widespread in Iranian prisons, that the authorities use[d] torture as a matter of policy, and that meaningful international oversight or intervention [was] lacking”). Only one of these three prongs, in combination with specific grounds to indicate that Mr. XXXX is personally at risk of torture, is necessary to carry the respondent’s burden.

Deliberately inflicted acts of torture are pervasive and widespread in Iraq. According to the Department of State, local and international human rights organizations and Iraq’s Ministry of Human Rights “continued to report torture and abuse in *several* MOI [Ministry of the Interior]

and MOD [Ministry of Defense] detention facilities.” See “2008 Iraq Country Report” (emphasis added) Exhibit O. “*Numerous and serious* reports of torture and abuse were leveled at MOI’s Kadhamiya National Police detention facility and the MOD/MOJ Harithiya facility in Baghdad.” Id. (Emphasis added) In August, the Iraqi Ministry of Human Rights reported that “electricity and water, which leave few physical traces, were the most commonly used torture methods.” The State Department also documents credible reports of “extreme beatings, sexual assault, and threats of death,” as well as “electric shocks ... suspension by the limbs for long periods, threats of ill-treatment of relatives, and in some cases, gunshot wounds.” Id.

Torture is commonly used at every point along the detention and investigation of criminal suspects, from the point of arrest until trial. The State Department reports “as in previous years, reports of abuse at the point of arrest and during the investigation period ... continued to be *common*.” Id. (emphasis added) “There were continuing reports of torture and abuse throughout the country and in many police stations; the incidents generally occurred during the interrogation phases.” Id. Human Rights Watch reports that “the majority of the detainees” with whom they spoke “said that torture and ill-treatment under interrogation was routine.” See “Human Rights Watch Report” Exhibit P. The detainees’ reports, which “were consistent to a high degree,” described detainees “being blindfolded with their hands tied behind their back while undergoing interrogation. They said their interrogators or guards kicked, slapped and punched them, and beat them all over the body using hosepipes, wooden sticks, iron rods, and cables.” Id. The time during which such detainees are vulnerable to torture is astonishingly long; “As of June, fewer than half of detainee cases went before a judge within a year of detention.” See “2008 Human Rights Report: Iraq” Exhibit O.

- b. Mr. XXXX is particularly vulnerable to torture because he is a young, mentally ill, socially isolated person.**

Specific grounds exist to indicate that Mr. XXXX will be tortured in Iraq after he is detained. As noted above, torture of criminal suspects is common in Iraq at all points between the point of arrest and trial, especially during the course of interrogation. While detained, Mr. XXXX will not have the psychological, intellectual, or social competency necessary to avoid torture during interrogations. Further, the retraumatization of being detained and interrogated under extremely harsh conditions will aggravate his PTSD symptoms and cause Mr. XXXX to behave in ways that the authorities do not understand.

Mr. XXXX demonstrates a complete lack of ability to provide cooperative answers during the course of interrogation by Iraqi security or police forces. He does not understand enough Arabic to respond to even the most basic line of questioning that he would receive in such circumstances. See “Declaration of XXXX XXXX” Exhibit A. His complete lack of knowledge of social norms will also significantly impair Mr. XXXX’s ability to produce an appropriate response to interrogation. Further, Mr. XXXX’s inability to effectively communicate with authorities will be compounded because his understanding of the world around him is limited by intellectual and psychiatric difficulties. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C.

It is also clear that Mr. XXXX’s vulnerability to torture goes well beyond his inability to effectively respond to interrogation. The certain retraumatization of such an experience would bring about behaviors in Mr. XXXX that are symptomatic of his PTSD. Mr. XXXX displays inappropriate affect when asked questions about serious subjects. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C. His history indicates that Mr. XXXX is often withdrawn and sullen or irritable and angry, especially in response to stress or trauma. Id.; See also “Fairfax County Public Schools Psychological Report” Exhibit D. His history also indicates that Mr. XXXX’s

behavior in response to serious trauma is often strange. See “Declaration of KA” Exhibit B. At any point during his detention, especially during interrogation, these behaviors will be seen as actively uncooperative or bizarre to Iraqi authorities and will cause them to torture Mr. XXXX. It is therefore more likely than not that Mr. XXXX will be tortured by or at the instigation of a public official in Iraq.

II. It is more likely than not that Mr. XXXX will be tortured by, at the instigation of, or with the consent or acquiescence of a public official if removed to Pakistan because Pakistani authorities will arrest and detain him, and they will torture him while he is detained.

Pakistani authorities are more likely than not to arrest and detain Mr. XXXX because he is a young, mentally ill man whose behavior is seemingly suspicious. While he is incarcerated, Pakistani authorities will most likely torture Mr. XXXX on account of his aberrant and suspicious behavior.

A. Pakistani authorities are more likely than not to arrest and detain Mr. XXXX because he is a young mentally ill person whose behavior is aberrant and because he has no family or community ties to the country.

Arbitrary arrests of persons gathered in public are used as a matter of policy and are pervasive and widespread in Pakistan. Mr. XXXX is even more likely than Pakistani nationals to be subject to such arrests because he has no family, no home, no resources, and no ability to ask for help; he will therefore be simultaneously completely socially isolated and highly socially visible as a homeless person who speaks only English. See “Declaration of XXXX XXXX” Exhibit A; “Declaration of KA” Exhibit B; “Psychological Report of Dr. NM, Ph.D.” Exhibit C; See also “Redacted CAT Case of Mentally-Ill Columbian Respondent” Exhibit Q (holding that the Columbian respondent in that case would be arrested because his long absence from Columbia, his mental illness, and his inability to readjust to a country where he has not lived for decades because his behavior will draw the attention of the authorities). In addition, Mr.

XXXX's abnormal behaviors, developmental disabilities and aberrant social affect will compound his vulnerability to arrest and make him a particular target of these widespread arrests. Id.

According to the U.S. Department of State, “[p]olice *routinely* did not seek magistrate approval for investigative detention and often held detainees without charge until a court challenged them.” “2008 Human Rights Report: Pakistan” Exhibit E (emphasis added). This pattern of arrest is a matter of policy in Pakistan because Section 144 of the Code of Criminal Procedure allows for the detention of persons for gathering in public, even in very small groups. See “Pakistan – Amnesty International Report 2008” Exhibit F; “Asian Human Rights Commission Statement” Exhibit G. This provision was rigorously enforced during much of 2008 and a police order imposing this law is effective in Islamabad for the period of February-April 2009. Id. In addition to widespread use of a restrictive detention policy, due process and the rule of law in Pakistan are in such disarray in Pakistan that “most detainees were held without reference to *any* law.” “Pakistan – Amnesty International Report 2008.” Exhibit F (emphasis added). “[M]agistrates usually approved investigative detention without reference to its necessity. In cases of insufficient evidence, police and magistrates sometimes colluded through issuing new FIRs [arrest warrants] to continue detention beyond the 14-day period provided in the law.” “2008 Human Rights Report: Pakistan” Exhibit E.

Pakistani authorities will not be able to distinguish between Mr. XXXX's mental illness and his perceived criminality because of the deep stigma of mental illness that is pervasive in Pakistani society. Typically, one's family is the sole resource for care of the mentally ill. See “2008 Human Rights Report: Pakistan” Exhibit E. (reporting that families care for the majority of people with physical and mental disabilities); “Stigma of Mental Illness” Exhibit H (stating

that many mental illness sufferers remain on the mercy of their families). Because Mr. XXXX has absolutely no family or community ties on which to rely in Pakistan and no familiarity with Pakistani languages and culture, his aberrant behavior will complete his social isolation and cause him to directly fit the stigmatized profile that the whole of Pakistani society finds suspicious.

Furthermore, the inevitable trauma and PTSD flashbacks he will face upon return to Pakistan are certain to exacerbate his behavioral symptoms, ensuring that he will come to the attention of Pakistani authorities. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C; “Fairfax County Public Schools Psychological Report” Exhibit D. Mr. XXXX’s likely behavioral responses to the trauma of his removal are certain to occur in public spaces because Mr. XXXX has no place to live in Pakistan and no family or community ties there. Taken together with the abusive and arbitrary pattern of arrests among the Pakistani police and Pakistan’s stigmatization of the mentally ill, Mr. XXXX’s specific vulnerabilities as a socially isolated, mentally ill person establish that he is more likely than not to be arrested and detained by Pakistani officials.

B. After Mr. XXXX is detained, he will be tortured by or at the instigation or acquiescence of a public official in Pakistan because gross, flagrant, and mass violations of human rights occur in Pakistan, torture is widespread and pervasive and is used as a matter of policy, and because specific grounds exist to indicate that Mr. XXXX is personally at risk of torture.

While Mr. XXXX is detained, he will be tortured by Pakistani police or security forces. When determining whether it is more likely than not that an applicant will be tortured, this Court must consider all “[e]vidence of gross, flagrant or mass violations of human rights within the country of removal” and any “[o]ther relevant information regarding conditions in the country of removal.” 8 C.F.R. § 208.16(c)(3)(iii), (iv). In Matter of G-A-, the Board held that the Iranian

authorities would more likely than not torture the respondent because the country conditions in Iran demonstrated a “widespread use of torture in Iran” and because the respondent had a “combination” of traits that would expose him to torture. 23 I&N at 368. Likewise in Pakistan, Mr. XXXX will be tortured because of the gross, flagrant, and mass human rights violations which occur regularly in Pakistan and because the combination of his mental illness-related behavior, his lack of social competence, and his status as a suspicious seeming homeless person.

a. Evidence of gross, flagrant, and mass violations of human rights establish that torture is pervasive and widespread and that torture is used as a matter of policy in Pakistan.

Deliberately inflicted acts of torture are used as a matter of policy and are pervasive and widespread in Pakistan. Government authorities use torture as a matter of policy when they “intentionally and deliberately” torture detainees or prisoners. G-A-, 23 I&N Dec. at 370 (holding that the Iranian authorities used torture as a matter of policy because they “intentionally and deliberately” tortured detainees to force confessions); see also J-E-, 23 I&N Dec. at 301 (holding that the Haitian authorities did not use torture as a matter of policy because they did not “intentionally and deliberately” create and maintain “poor prison conditions in order to inflict torture”). Pakistan’s policy of torture is evidenced by the fact that under the country’s Anti-Terrorism Act, “coerced confessions are admissible in antiterrorism courts.” “2008 Human Rights Report: Pakistan” Exhibit E. It is well documented that Pakistani police use torture on a routine basis. The U.S. Department of State reports that “police reportedly tortured and mistreated those in custody and at times engaged in extrajudicial killings.” Id. Methods of torture include “beating with batons and whips, burning with cigarettes, whipping the soles of the feet, prolonged isolation, electric shock, denial of food or sleep, hanging upside down, and forced spreading of the legs with bar fetters.” Id. Amnesty International reports that many of

those, who like Mr. XXXX would be, “arbitrarily detained were reportedly tortured or otherwise ill-treated, including by sleep deprivation and denial of urgently needed medical treatment. Torture and other ill-treatment were *routinely* used against criminal suspects.” “Pakistan – Amnesty International Report 2008” Exhibit F (emphasis added). Likewise, Human Rights Watch asserts that “[t]orture is *routinely* used in Pakistan, both to obtain confessions in criminal cases and against political and ideological opponents. Most acts of torture are aimed at producing a confession during the course of a criminal investigation.” “UK Should Investigate Role in Torture in Pakistan” Exhibit I (emphasis added). Thus, these numerous, credible reports of torture of detainees in Pakistan establish that the use of torture is pervasive and widespread in Pakistan. These reports also exceed the isolated acts found in Matter of J-E- and more resemble the systemic torture found in Matter of G-A-. This evidence of pervasive and widespread torture proves that it is more likely than not that Pakistani authorities will torture Mr. XXXX while he is detained.

b. Specific grounds exist to indicate that Mr. XXXX is personally at risk of torture as a mentally ill, socially isolated criminal suspect.

Specific grounds exist to indicate that Mr. XXXX will be tortured in Pakistan after he is detained. As noted above, torture of criminal suspects is routine in Pakistan is routine during the course of a criminal investigation. While detained, Mr. XXXX will not have the psychological, intellectual, or social competency necessary to avoid torture while being investigated and coerced to confess to crimes of which he is arbitrarily suspected. Further, the retraumatization of being detained and investigated under extremely harsh conditions will aggravate his PTSD symptoms and cause Mr. XXXX to behave in ways that the authorities do not understand.

Mr. XXXX demonstrates a complete lack of ability to provide cooperative answers during questioning or when given orders by Pakistani officials. He does not understand enough

Urdu or any other Pakistani language to respond to even the most basic line of questioning that he would receive in such circumstances. See “Declaration of XXXX XXXX” Exhibit A. His complete lack of knowledge of social norms will also significantly impair Mr. XXXX’s ability to comply with his detainers’ orders and expectations. Further, Mr. XXXX’s inability to effectively communicate with authorities will be compounded because his understanding of the world around him is limited by intellectual and psychiatric difficulties. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C.

It is also clear that Mr. XXXX’s vulnerability to torture goes well beyond his inability to comport to the expectations of his detainers. The certain retraumatization of such an experience would bring about behaviors in Mr. XXXX that are symptomatic of his PTSD. Mr. XXXX displays inappropriate affect when asked questions about serious subjects. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C. His history indicates that Mr. XXXX is often withdrawn and sullen or irritable and angry, especially in response to stress or trauma. Id.; See also “Fairfax County Public Schools Psychological Report” Exhibit D. His history also indicates that Mr. XXXX’s behavior in response to serious trauma is often strange. See “Declaration of KA” Exhibit B. At any point during his detention, especially when asked for a confession to alleged criminal activity, these behaviors will be seen as actively uncooperative or completely bizarre to Pakistani authorities and will cause them to torture Mr. XXXX to obtain a confession. It is therefore more likely than not that Mr. XXXX will be tortured by or at the instigation of a public official in Pakistan.

III. It is more likely than not that Mr. XXXX will be tortured by, at the instigation of, or with the consent or acquiescence of a public official if removed to Iran because Iranian authorities will interrogate and detain him and they will torture him while he is incarcerated.

Mr. XXXX will be tortured if removed to Iran. Iranian authorities will interrogate and detain Mr. XXXX based on a combination of factors including the duration of his residence in the United States, his sole competence in English, his American cultural mannerisms, his theft convictions, and seemingly suspicious behavior that is the result of his mental illness. While he is incarcerated, Iranian authorities will torture Mr. XXXX for the same reasons.

- A. Upon his deportation to Iran, Mr. XXXX will be interrogated and detained based on a combination of factors including the duration of his residence in the United States, his sole competence in English, his American cultural mannerisms, his theft convictions, and seemingly suspicious behavior that is the result of his mental illness.**

Iranian authorities will interrogate and detain Mr. XXXX. In Matter of G-A-, an Iranian citizen who had lived in the United States for twenty-five years feared that he would be tortured if removed to Iran because of his length of stay in the United States, drug convictions, and minority religion and ethnicity. 23 I&N Dec. at 369. The Board of Immigrations Appeals held that the Iranian authorities would more likely than not interrogate and detain the respondent because of the combination of his lengthy residence in the United States, his criminal convictions, and other factors that would make him seem suspicious. Id. A review of the relevant factors in Matter of G-A-, current country conditions in Iran, and Mr. XXXX's situation reveal a substantial similarity in the claims of Mr. XXXX and the respondent in Matter of G-A-. Because he shares many of the characteristics that the Board identified in Matter of G-A- and because of his own unique characteristics, such as his nearly complete Americanization and his mental illness, Mr. XXXX will be identified as suspicious, interrogated, and detained by Iranian authorities.

- 1. Iranian airport authorities will interrogate, detain, and incarcerate Mr. XXXX for his nearly complete Americanization.**

In Matter of G-A-, the Board found that “Iranians who have spent an extensive amount of time in the United States are perceived to be opponents of the Iranian Government or even pro-American spies.” 23 I&N Dec. 366, 368 (2002). Because of this, the Board held that “respondent would be subjected to close scrutiny upon his return” and that “he would likely be detained and interrogated as a result.” Id. at 370. Mr. XXXX exhibits qualities that make him appear even more suspiciously American than the respondent in Matter of G-A-. He only knows English and has spent much of his childhood in America. See “Declaration of XXXX XXXX” Exhibit A; “Declaration of KA” Exhibit B. Mr. XXXX exhibits a total lack of understanding concerning the rigid societal norms of Iranian society. This makes him even more vulnerable to incarceration. In Matter of G-A-, the Board only cites the respondent’s “extensive amount of time in the United States” as the reason that Iranian authorities would perceive him to be one of the “opponents of the Iranian government or even pro-American spies.” Matter of G-A-, supra, at 368. Mr. XXXX exhibits suspiciously American characteristics beyond those cited in Matter of G-A- and is therefore even more vulnerable to arrest and detention on account of his perceived Americanization. Further, United States-Iranian relations are even worse today than the relations noted in 2002 in Matter of G-A-. See “Background Note: Iran” Exhibit L. The Iranian government still subjects citizens returning from abroad to “searches and extensive questioning . . . for evidence of antigovernment activities abroad.” See “2007 Human Rights Report: Iran,” Exhibit J.

2. Iranian authorities will more likely than not interrogate and detain Mr. XXXX for his theft convictions.

In Matter of G-A-, the respondent feared that he would be interrogated, detained, incarcerated, and tortured if removed to Iran because drug trafficking was a serious crime in Iran punishable by death. 23 I&N Dec. at 371. Crediting this fear, the BIA held that the Iranian

authorities would more likely than not interrogate, detain, incarcerate, and torture the respondent after they discovered his criminal convictions. Id. at 369, 372. Theft is a serious crime in Iran, and amputation is a sanctioned punishment for theft. See “2008 Iran Country Reports,” Exhibit K. Authorities often charge individuals with relatively undefined crimes such as “anti-revolutionary behavior” or “moral corruption,” detain them for weeks or months without charges or a hearing, and subject them to trials that have been condemned for their disregard of international standards of fairness. Id.

The Iranian embassy will likely ask for Mr. XXXX’s criminal record before issuing him travel documents. Mr. XXXX has never had a passport, and before he can be removed to Iran, ICE must arrange for his travel documents with the Iranian embassy. Consequently, ICE will likely have to submit to Iranian authorities his immigration documents, including his Notice to Appear and criminal record. See Hosseini v. Gonzales, 471 F. 3d 953, 959-60 (9th Cir. 2006) (“Upon deportation, Hoesseni will have to submit to Iranian authorities ‘all court documents including all the charges and court orders.’” quoting Embassy of Pakistan Interests Section of the Islamic Republic of Iran, Travel Document Requirements for Citizens of the Islamic Republic of Iran). Thus, Iranian authorities will be on actual notice of Mr. XXXX’s criminal record because of information directly provided by the United States government.

Additionally, Mr. XXXX’s forced removal from the United States will put the Iranian authorities on constructive notice that he is a convicted criminal. In Matter of G-A-, the Board found that the Iranian authorities would more likely than not learn of the respondent’s criminal convictions because of his “apparent loss of legal status—as evidenced by his deportation.” 23 I&N Dec. at 369. Similarly, Iranian authorities will discover Mr. XXXX’s convictions because of the manner in which he is reentering Iran—not as a free man, but as a criminal deportee.

3. Mr. XXXX's mental illness will further contribute to Iranian authorities' already high suspicion because he will be unable to respond effectively to questioning.

Mr. XXXX's mental illness greatly increases the already high likelihood that he will be interrogated and detained. His mental limitations and accompanying behaviors are an additional characteristic beyond those that Mr. XXXX shares with the respondent in Matter of G-A-. In Matter of G-A-, the Board credited the respondent's testimony that he would be easily identifiable by government authorities at the airport as a suspicious person because of his ethnic background and Christian surname. 23 I&N Dec. at 369. The Board further reasoned that once the respondent came to the attention of the authorities, their attention would be further focused on him because of his lengthy residence in United States, his attempt to apply for asylum, and his criminal conviction. While Mr. XXXX does not share precisely the same characteristics as the respondent in Matter of G-A-, his mental illness will similarly cause him to be initially flagged as suspicious and targeted for interrogation concerning perceived anti-regime activities abroad.

In particular, Mr. XXXX's mental illness causes him to display a number of characteristics that will compound Iranian authorities' suspicions of him because he will not be able to sufficiently respond to questioning from Iranian officials. Mr. XXXX displays inappropriate affect when asked serious questions and often cannot comprehend the gravity of important situations. See "Psychological Report of Dr. NM, Ph.D" Exhibit C. He also tends to answer questions in overly simplistic and concrete terms. Id. If he is subjected to a hostile or complicated line of questioning, he will not likely be able to produce a satisfactory response. This sort of questioning is likely because the Iranian government subjects citizens returning from abroad to "searches and extensive questioning . . . for evidence of antigovernment activities abroad." See "2007 Human Rights Report: Iran," Exhibit J.

B. Mr. XXXX will be tortured while he is detained and incarcerated because gross, flagrant, and mass violations of human rights occur routinely in Iran and because he will be specifically targeted due to the same factors that led to his arrest.

While Mr. XXXX is incarcerated, he will suffer torture at the hands of Iranian authorities. When determining whether it is more likely than not that an applicant will be tortured, this Court must consider all “[e]vidence of gross, flagrant or mass violations of human rights within the country of removal” and any “[o]ther relevant information regarding conditions in the country of removal.” 8 C.F.R. § 208.16(c)(3)(iii), (iv). In Matter of G-A-, the Board held that the Iranian authorities would more likely than not torture the respondent because the country conditions in Iran demonstrated a “widespread use of torture in Iran” and because the respondent had a “combination” of traits that would expose him to torture. 23 I&N at 368. Mr. XXXX will be tortured because of the gross, flagrant, and mass human rights violations which occur regularly in Iran and because the combination of his long-term residence in the United States, his criminal convictions, and his mental illness make him especially vulnerable to torture.

1. Gross, flagrant, and mass human rights violations occur regularly in Iran as evidenced by pervasive and widespread acts of torture in Iranian prisons, the use of torture as a matter of policy by Iranian authorities, and the lack of meaningful international oversight or intervention.

Gross, flagrant, and mass violations of human rights occur in Iran. When considering country conditions, an applicant is more likely than not to be tortured if “deliberately inflicted acts of torture are pervasive and widespread,” government “authorities use torture as a matter of policy,” or “meaningful international oversight or intervention is lacking.” J-E-, 23 I&N Dec. at 303 (denying respondent protection under CAT because “isolated acts of torture” in Haiti are not enough to prove that respondent will more likely than not be tortured); see also G-A-, 23 I&N at 372 (holding that respondent was eligible for deferral of removal under CAT because the

evidence indicated that “deliberate acts of torture [were] pervasive and widespread in Iranian prisons, that the authorities use[d] torture as a matter of policy, and that meaningful international oversight or intervention [was] lacking”).

a. Numerous, credible reports of Iranian authorities using torture demonstrates that deliberate acts of torture are pervasive and widespread in Iran.

Deliberate acts of torture are pervasive and widespread in Iran. An applicant is more likely than not to be tortured when deliberate acts of torture are pervasive and widespread in the country of removal. J-E-, 23 I&N Dec. at 303. “[N]umerous, credible reports” of government officials engaging in acts of torture are sufficient to establish that deliberate acts of torture are pervasive and widespread.” G-A-, 23 I&N Dec. at 370, 372 (holding that respondent established that deliberate acts of torture were pervasive and widespread in Iran because of the numerous and credible reports that Iranian authorities continued to torture detainees and prisoners); see also J-E-, 23 I&N Dec. at 303 (holding that respondent did not establish that torture was widespread and pervasive in Haiti because there was only evidence of “isolated acts of torture [occurring] in Haitian detention facilities”).

In the present case, there are numerous, credible reports that Iranian officials routinely use torture in Iranian prisons. Amnesty International’s latest report on Iran states that “[t]orture and other ill-treatments were *widespread* in prisons and detention centers.” “Amnesty International Report 2008 - Iran,” Exhibit M. The State Department also confirms that “there were *numerous* credible reports that security forces and prison personnel tortured detainees and prisoners.” “2008 Human Rights Report: Iran,” Exhibit K (emphasis added). Common methods of abuse include,

prolonged solitary confinement with sensory deprivation, beatings, long confinement in contorted positions, kicking detainees with military boots, hanging detainees by the arms and legs, threats of execution if individuals refused to

confess, burning with cigarettes, sleep deprivation, and severe and repeated beatings with cables or other instruments on the back and on the sole of the feet.

Id. Other reported methods include “beatings on the ears, including partial or complete deafness; punching the area around the eyes, leading to partial or complete blindness; and the use of poison to induce illness.” Id. Prisoners were also denied food and medical care to force confessions. See id. There is even evidence that nonviolent offenders are intentionally incarcerated with violent offenders, anticipating they will be killed. “2007 Human Rights Report: Iran” Exhibit J. All of these reports depict extreme forms of cruel, inhuman, and degrading treatment that constitute torture. See G-A-, 23 I&N Dec. at 370 (holding that similar treatment in Iran constituted “torture as defined in the regulations”). These numerous reports of torture far surpass the “isolated allegations of misconduct that [rose] to the level of torture” found in Matter of J-E-, 23 I&N Dec. at 303, and are similar to the routine acts of torture found in Iran in 2002 in Matter of G-A-, 23 I&N Dec. at 372. Thus, these numerous, credible reports of torture in Iranian prisons establish that the use of torture is pervasive and widespread in Iran. These reports also exceed the isolated acts found in Matter of J-E- and more resemble the systemic torture found in Matter of G-A-. This evidence of pervasive and widespread torture proves that it is more likely than not that Iranian authorities will torture Mr. XXXX while he is detained.

b. Iranian authorities use torture as a matter of policy as evidenced by its use to force confessions from detainees, to conduct executions, and to abuse citizens’ due process rights.

Iranian authorities use torture as a matter of policy. An applicant is more likely than not to be tortured when government authorities use torture as a matter of policy. See J-E-, 23 I&N Dec. at 303. Government authorities use torture as a matter of policy when they “intentionally and deliberately” torture detainees or prisoners. G-A-, 23 I&N Dec. at 370 (holding that the

Iranian authorities used torture as a matter of policy because they “intentionally and deliberately” tortured detainees to force confessions); see also J-E-, 23 I&N Dec. at 301 (holding that the Haitian authorities did not use torture as a matter of policy because they did not “intentionally and deliberately” create and maintain “poor prison conditions in order to inflict torture”). In Matter of G-A-, the Board found that Iran intentionally and deliberately tortured detainees or prisoners to force confessions, sentenced “many criminal offenses” with harsh, torturous punishments like stoning, and routinely denied citizens due process or fair trials. 23 I&N Dec. at 369, 371. Similarly, Iran still tortures detainees and prisoners to force confessions, stones and executes those convicted of moral crimes, and continues to abuse citizens’ due process rights. See “2008 Human Rights Report: Iran” Exhibit K.

Despite the constitution’s prohibition on the use of torture, Iranian authorities routinely torture prisoners to extract confessions or otherwise acquire information. Id. Likewise, there are numerous reports that Iranian authorities mistreat prisoners and that prison conditions are very poor. Id. Unlike in Matter of J-E-, where the Haitian government was “attempting to improve its prison system,” 23 I&N Dec. at 301, the Iranian government has made no attempts to prevent the torturous acts which occur in its prisons. See “2008 Human Rights Report: Iran” Exhibit K. Additionally, Iranian authorities routinely abuse their citizens’ due process rights. Defendants are routinely denied a presumption of innocence and access to legal representation until initial investigations are completed and charges brought, which takes months. See “2008 Human Rights Report: Iran” Exhibit K. Authorities often charged individuals with undefined crimes, such as “moral corruption.” Id. Also, “[s]ecret or summary trials of only five minutes’ duration occurred frequently.” Id.

While the Iranian constitution and penal code require that arrested person must be informed of the charges against them within 24 hours, “detainees often went weeks or months without charges” and were “denied access to legal representation for prolonged periods.”

Id. These deliberate and intentional abuses of human rights facilitate the Iranian authorities’ use of torture against those it cannot legally punish. Thus, these practices demonstrate that Iranian authorities use torture as a matter of policy.

c. Iran lacks meaningful international oversight or intervention because the government does not allow nongovernmental organizations to freely operate in the country.

Iran lacks meaningful international oversight or intervention. An applicant is more likely than not to be tortured when the country of removal lacks meaningful international oversight or intervention. J-E-, 23 I&N Dec. at 303. Meaningful international oversight or intervention is lacking when the government does not allow nongovernmental organizations to monitor country conditions and provide assistance. See G-A-, 23 I&N Dec. at 371 (holding that meaningful international oversight or intervention was lacking because the “Iranian authorities [did] not permit nongovernmental organizations, such as the International Committee for the Red Cross (“ICRC”) or the United Nations High Commissioner for Refugees (“UNHCR”) to visit prisons and detention centers, monitor conditions or meet with prisoners”); see also J-E-, 23 I&N Dec. at 301. The Iranian government does not allow international human rights NGOs to “establish offices in or conduct regular investigative visits to the country,” See “2008 Human Rights Report: Iran” Exhibit K. Denying the existence of a human rights problem, the Iranian government has continued to close its doors to NGOs as documented by the Board in Matter of G-A- and has not allowed any international human rights NGOs to visit since 2004. See “2008 Human Rights Report: Iran” Exhibit K.

This overwhelming evidence of gross, flagrant, and mass human rights violations demonstrates that it is more likely than not that Mr. XXXX will be tortured by the Iranian government while he is incarcerated.

2. Iranian authorities will specifically target Mr. XXXX and torture him because of his lengthy residence in the United States, his conviction for theft in the United States, and his mental illness related behavior.

Iranian authorities will more likely than not specifically target Mr. XXXX for torture. To show that he will more likely than not be tortured if removed to Iran, Mr. XXXX has the burden to demonstrate that specific grounds exist that indicate that he will be personally at risk of being tortured. See J-E-, 23 I&N Dec. In Matter of G-A-, the Board held that the Iranian respondent had demonstrated that he was more likely than not to be tortured in Iran because of “the combination of factors presented, including his religion, his ethnicity, the duration of his residence in the United States, and his drug-related convictions.” 23 I&N Dec. at 372. Similarly, a combination of Mr. XXXX’s traits will more likely than not cause the Iranian authorities to torture him.

First, Iranian authorities will specifically target Mr. XXXX for torture because of his lengthy residence in the United States. Mr. XXXX has lived in the United States for eleven years and is highly Americanized. See “Declaration of XXXX XXXX,” Exhibit A; “Declaration of KA” Exhibit B. Because of his lengthy residence in the United States, the Iranian authorities will interrogate and detain Mr. XXXX. See “2008 Human Rights Report: Iran” Exhibit K; Matter of G-A-, 23 I&N Dec. at 369. Once in prison, the Iranian authorities will subject Mr. XXXX to numerous acts of torture because they will accuse him of being an opponent of the Iranian government or a threat to national security because of his long-term residence in the United States. See “2008 Human Rights Report: Iran” Exhibit K.

In addition to the torture that Mr. XXXX will suffer while detained in prison, Iranian authorities will more likely than not punish him for a crime of moral corruption. As part of the government crackdown against moral corruption, Iranian authorities will likely execute Mr. XXXX or amputate his fingers or limbs for his history of theft. See “2008 Human Rights Report: Iran” Exhibit K. Although amputation is a lawful punishment for theft under Iranian law, such treatment would defeat the purpose of CAT and is tantamount to torture. See 8 C.F.R. § 208.18(a)(3) (“Lawful sanctions include judicially imposed sanctions and other enforcement actions authorized by law, including the death penalty, but do not include *sanctions that defeat the object and purpose of [CAT] to prohibit torture.*” Emphasis added.). This desire to punish and eradicate immorality coupled with routine unfair trial procedures will result in the Iranian government unjustly and inhumanely amputate Mr. XXXX’s limbs or digits. See “2008 Human Rights Report: Iran” Exhibit K. Thus, the Iranian authorities will more likely than not torture Mr. XXXX with or without an actual conviction in Iran for a crime committed and punished for in the United States.

Further, Mr. XXXX demonstrates a complete lack of ability to provide cooperative answers during questioning or when given orders by Iranian officials. He does not understand enough Farsi to respond to even the most basic line of questioning that he would receive in such circumstances. See “Declaration of XXXX XXXX” Exhibit A. His complete lack of knowledge of social norms will also significantly impair Mr. XXXX’s ability to comply with his detainers’ orders and expectations. Further, Mr. XXXX’s inability to effectively communicate with authorities will be compounded because his understanding of the world around him is limited by intellectual and psychiatric difficulties. See “Psychological Report of Dr. NM, Ph.D.” Exhibit C.

It is also clear that Mr. XXXX's vulnerability to torture goes well beyond his inability to comport to the expectations of his detainers. The certain retraumatization of such an experience would bring about behaviors in Mr. XXXX that are symptomatic of his PTSD. Mr. XXXX displays inappropriate affect when asked questions about serious subjects. See "Psychological Report of Dr. NM, Ph.D." Exhibit C. His history indicates that Mr. XXXX is often withdrawn and sullen or irritable and angry, especially in response to stress or trauma. Id.; See also "Fairfax County Public Schools Psychological Report" Exhibit D. His history also indicates that Mr. XXXX's behavior in response to serious trauma is often strange. See "Declaration of KA" Exhibit B. At any point during his detention, especially when asked for a confession to alleged anti-regime activities, these behaviors will be seen as actively uncooperative or completely bizarre to Iranian authorities and will cause them to torture Mr. XXXX to obtain a confession. It is therefore more likely than not that Mr. XXXX will be tortured by or at the instigation of a public official in Iran.

Therefore, it is more likely than not that Mr. XXXX will be tortured by Iranian authorities if he is removed to Iran.

CONCLUSION

For the reasons stated above, Mr. XXXX respectfully requests that the Court grant him deferral of removal to Pakistan, Iraq, and Iran under Article 3 of the Convention Against Torture.

Respectfully submitted,

Date: _____

Bradley Jenkins

BIA Accredited Representative
Capital Area Immigrant's Rights Coalition
1612 K Street NW Suite 204
Washington, DC 20006
(202) 331-3320 x 19
(202) 331-3341 (fax)