**United States Department of Homeland Security**

**United States Citizenship & Immigration Services**

**Chicago Asylum Office (Minnesota Circuit Ride)**

1. **DECLARATION & PERSONAL DOCUMENTS OF PRINCIPAL APPLICANT**

**TAB**

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| **A** | Sworn Declaration by Principal Applicant John CLIENT (#A000-000-000), in support of his application for asylum |
| **B** | 08/29/2021 I-94 for John CLIENT (I-94 #000000000) |
| **C** | Complete copy of every page of Principal Applicant’s Afghan passport, Copy of his Tazkira (Afghan ID); and 10/06/2021 EAD |
| **D** | Copy of February 26 letter from Taliban (“Islamic Emirate of Afghanistan”) threatening John CLIENT on account of his work carrying out the U.S.’s goals in Afghanistan, WITH translation AND certificate of translation. |
| **E** | Copy of 03/18/2011 letter confirming John CLIENT’s employment with XXX |
| **F** | Copy of John CLIENT’s employment certificate from X Co. |
| **G** | Copy of John CLIENT’s employment letter from Y Co. |

1. **PERSONAL DOCUMENTS OF RIDERS/DERIVATIVE APPLICANTS**

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| **H** | Sworn Corroborating Declaration of Spouse/Rider Jane CLIENT |
| **I** | 08/29/2021 I-94 for Spouse/Rider Jane CLIENT (I-94 #00000000) (A000-000-000) |
| **J** | Jane CLIENT’s Tazkira (Afghan ID) & EAD |
| **K** | 08/29/2021 I-94 for Child/Rider Gail CLIENT(I-94 #000000000) (A000-000-000) |
| **L** | Gail CLIENT’s Tazkira & EAD |

1. **ADDITIONAL CORROBORATING DOCUMENTS**

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| **M** | Sworn corroborating declaration by Principal Applicant’s brother Dave Client |
| **N** | U.S. Passport Biographic Information Page for Dave Client |
| **O** | Photos of Principal Applicant working at Base X |

1. **COUNTRY CONDITIONS EVIDENCE OF TALIBAN PERSECUTION OF AFGHANS LIKE JOHN CLIENT WHO HAVE, OR ARE PERCIEVED TO HAVE, PRO-DEMOCRACY, PRO-ISLAMIC REPUBLIC OF AFGHANISTAN, AND/OR PRO-U.S. POLITICAL VIEWS**

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| **P** | **United States Department of State, “2021 Country Reports on Human Rights Practices: Afghanistan” (April 12, 2022)** available at https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/afghanistan/  The Taliban referred to suicide attacks as “martyrdom operations.” **The Taliban engaged in targeted killings of perceived opponents in areas controlled by the pre-August 15 government and in reprisal killings as it moved across the country.** After August 15, senior Taliban leadership announced a wide-ranging general amnesty that prohibited reprisals, including against officials and others associated with the pre August 15 government, for actions before the Taliban takeover; however**, credible reports were received of retaliatory acts, including extrajudicial killings and forced disappearances, both before and after this announcement**.  Thousands of those who worked for or supported the pre-August 15 government or foreign entities, as well as members of minority groups, sought to flee the country on or after August 15 due to fear of reprisals. **Others left their homes to hide from Taliban conducting house-to-house searches for government officials.**    There were numerous reports of torture and cruel, inhuman, and degrading punishment by the Taliban, ISIS-K, and other antigovernment groups. UNAMA reported that punishments carried out by the Taliban included beatings, amputations, and executions. The report showed that the Taliban held detainees in poor conditions and subjected them to forced labor”  **There were reports throughout the country in July, August, and September of the Taliban conducting raids on homes and establishments and the detention of citizens as political reprisals**, despite assurances from senior Taliban leaders beginning in August that nobody would be harmed and that they did not seek to take revenge. **UNAMA documented 44 cases of temporary arrests, beatings, threats and intimidation between August 15 and December 31, 42 of which were attributed to the Taliban....**  Violent attacks by insurgents against judges, prosecutors, and prison officials made members of the judicial sector increasingly fearful in carrying out their duties.....  Historic Taliban practices and post-August 15 actions created a climate of uncertainty and fear, which curtailed the work of journalists, civic activists, and human rights defenders, many of whom left the country due to retaliation. **Investigations and reports by journalists and human rights organizations, however, continued to bring to light human rights abuses and atrocities, including allegations of summary executions of persons associated with the previous government, as well as extrajudicial killings of journalists and activists.** |
| **Q** | ***Foreign Policy*, “Taliban Killings Skyrocket in Forgotten Afghanistan: A New Report Exposes the Regime’s Shocking Brutality” (Aug. 2, 2022)** available at https://foreignpolicy.com/2022/08/02/taliban-killings-skyrocket-afghanistan/  The Taliban’s killings of former members of the Afghan military and rights groups have spiked in recent months, according to a recent report compiled by Afghan diplomats and civil service staff. **The militant group is seeking to crack down on perceived regime opponents while also clashing with resistance groups.**  During bouts of fighting with the so-called National Resistance Front across three Afghan provinces in May as well as after armed uprisings in some of Afghanistan’s eastern and southern provinces, **the report concludes the Taliban arbitrarily detained, tortured, and killed dozens of civilians they accused of being linked with the deaths of their fighters.**  **“Shoot them in the head: male or female, anyone who opposes the Taliban and Islamic Emirate. They are brainwashed by Americans, and the only solution is to shoot them in the head,” Mullah Babak, a known Taliban official from Wardak province, said in a video shared on social media at the time**. “I am ready to come and shoot those captured by Taliban by my own gun, right in their head, and kill them like dogs and donkeys.”  **In one instance documented in the report, a son of a former Afghan intelligence official was tortured to death** inside the Taliban’s district police center in Badakhshan…. |
| **R** | **Human Rights Watch, “No Forgiveness for People Like You” (April 20, 2022)** available at  https://www.hrw.org/report/2021/11/30/no-forgiveness-people-you/executions-and-enforced-disappearances-afghanistan  .....**The Taliban have used these screenings to detain and summarily execute or forcibly disappear individuals within days of their registration**, leaving their bodies for their relatives or communities to find…  “**The Taliban, through their intelligence operations and access to employment records that the former government left behind, have identified new targets for arrest…**  “In smaller Afghan towns and villages, residents tend to know each other within communities and established neighborhoods. Because of these relationships, **the Taliban, even when not from the area, have been able to obtain information as well as identify individuals who have worked for the previous government**.” These people have been singled out for questioning or further investigation and some have been summarily executed or forcibly disappeared.  “The Taliban have also searched for known former security force members, **often threatening and abusing family members to reveal the whereabouts of those in hiding**. Some of those eventually apprehended **have been executed or taken into custody without acknowledgment of their detention or their location**, the crime of enforced disappearance.”  A man in Kandahar described a typical encounter when the Taliban came looking for his brother, who was with the ANSF: There was a knock on the door. Th**e [Taliban] asked: “Is [your brother] home?” I said no. “Do not be scared, tell him, we want to talk to him.” I said, no he is not home. A couple of days later, they took my brother from the street**. We looked everywhere. We went to the Taliban, who denied involvement. Two days later we found his body.  Despite Taliban denials, the nature of the killings indicates that local Taliban commanders carried out or ordered many of the executions or followed orders to do so by senior commanders or the Taliban’s intelligence unit. **In some provinces, Taliban commanders have said that they have lists of people—written or orally communicated—who have committed acts the Taliban deem “unforgiveable” and would be targeted. The pattern of the killings has sown terror throughout Afghanistan, as no one associated with the former government can feel secure they have escaped the threat of reprisal.**  Haji Melad Rahmati said: “They took me and my younger brother to the main police station. I was beaten unconscious…” |
| **S** | ***The Economic Times*, “Taliban use traditional Afghan method of 'night letters' to intimidate” (Aug. 31, 2021)** available at https://www.jurist.org/news/2021/10/afghanistan-dispatches-anyone-on-the-talibans-blacklist-is-in-great-danger/https://economictimes.indiatimes.com/news/international/world-news/taliban-use-traditional-afghan-method-of-night-letters-to-intimidate/articleshow/85795913.cms?utm\_source=contentofinterest&utm\_medium=text&utm\_campaign=cppst  **The Taliban are pinning chilling 'night letters on the doors of those they accuse of "working for the crusaders."** The notes order their victims to attend a Taliban-convened court. **Failure to do so will result in the death penalty**…  **The letters are a traditional Afghan method of intimidation.** They were used by mujahideen fighters during the Soviet occupation and then by the Taliban as both a propaganda tool and a threat…  One of those to receive a warning was Naz, a 34-year-old father-of-six whose construction company helped the UK military build roads in Helmand and the runway at Camp Bastion, the report said.  He had applied for sanctuary in Britain under ARAP, the Afghan relocation programme, but had been rejected.  Naz said: "**The letter was official and stamped by the Taliban. It is a clear message that they want to kill me. If I attend the court, I will be punished with my life.** |  |

1. **COUNTRY CONDITIONS EVIDENCE OF PRINCIPAL APPLICANT’S WELL FOUNDED FEAR OF PERSECUTION ON ACCOUNT HIS STATUS AS AN IMMEDIATE RELATIVE OF BROTHER CLIENT, A FORMER INTERPRETER FOR THE U.S. EMBASSY IN AFGHANISTAN**

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| **T** | **CNN, “‘If the Taliban find me, they will kill me and my family,’ says abandoned Afghan interpreter” (Aug. 15, 2021)** available at https://www.cnn.com/2021/08/15/asia/afghanistan-interpreters-us-visa-taliban-cmd-intl/index.html "If [the Taliban] find me, they will kill me and they will kill my family because I was an interpreter with the US Marines." …  He has been paying for his loyalty to the US ever since. He and his family have been in hiding for five years, scared for their lives -- his fear of retribution compounded with news of every province that falls into Taliban hands. |
| **U** | **United States Department of State, Foreign Affairs Manual 9 FAM 502-5.12(B)(a)(4)** **The Department has determined that Afghan SIV applicants are inherently under threat (regardless whether their employment has ended or if they have relocated**). Thus, holding qualifying service in Afghanistan is enough to satisfy the ongoing serious threat requirement…. |
| **V** | ***Voice of America*, “The Inside Story-Flight of the Translators” (Sept 1, 2022)** available at https://www.voanews.com/a/6727159.html  [**A]s many as 300 interpreters died in Afghanistan during this time while waiting for vis**as….  Haji could be here. Or he could be here. Or here. **He moves from city to city for safety from city to city for safety from the Taliban…**  **In 2010, the Taliban kidnapped Haji’s 9-year-old son because of his job…**  For 11 years he worked as an interpreter for US Special Forces… braving firefights across Afghanistan -- as he told VOA via Skype…  They know I am working with American forces and [they said,] “they are infidel and **you are infidel because you are working with them and you are providing all kinds of help to them**.”…  The Afghan police rescued his son a few weeks later in a gun battle with his kidnappers. **He says they killed an older son a few months ago. Now Haji is trying to save his own life after cellphone threats from the Taliban….** **They tell me they know my place, they know where I am staying, they are coming after me.** |

1. **FURTHER EVIDENCE IMMEDIATE RELATIVES CONSTITUE AN IMMUTABLE, PARTICULAR, AND SOCIALLY DISTINCT GROUP IN AFGHAN SOCIETY**

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| **W** | “**Pashtun,” Worldmark Encyclopedia of Cultures and Daily Life,** available at https://www.encyclopedia.com/humanities/encyclopedias-almanacs-transcripts-and-maps/pashtun (accessed 07/11/2022)  The Pashtun family is an extended family. **The household normally consists of the patriarch and his wife, his unmarried children, and his married sons and their wives and children. It is a patrilineal system in that descent is through the paternal side, and family loyalty is to the paternal line . . . Married sons live in their father's household rather than establishing homes of their own . . .**  Economically, the Pashtun family is a single unit. |
| **X** | **“Afghan Culture: Family,” Cultural Atlas (2019),** available at https://culturalatlas.sbs.com.au/afghan-culture/afghan-culture-family    In 2010, the average size of a household in Afghanistan was reported to be 7-8 people. **Traditionally, this is made up of a husband, wife, their unmarried daughters, and their sons and sons’ spouse and children**. In extended family households, three or four generations may live together |