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9 U.S. DEPARTMENT OF JUSTICE
10 EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
11 IMMIGRATION COURT
12 SEATTLE, WASHINGTON

13 In the Matter of:

FILE NO. A-200-893-771

14 DALJIT SINGH, *Not Detained*

15 Respondent.

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17
18 *Individual Hearing: December 9, 2015 at 8:30 a.m.*
19 *Honorable John F. Walsh*

20 **RESPONDENT'S PRE-HEARING STATEMENT**

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25 **RESPONDENT'S PRE-HEARING STATEMENT - 1**

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12 In the Matter of:
13 DALJIT SINGH,
14 Respondent.

FILE NO. A-200-893-771
RESPONDENT'S PRE-HEARING
STATEMENT

15
16 Respondent is 34-year-old native and citizen of India. He is married and father of
17 three children, currently age 15 and 12 years (twin girls). Respondent has been separated
18 from his family since October 2010, when he fled India due to three incidents of physical
19 harm and brutality inflicted on him by following members of the guru *Sarse Wala* and the
20 *Congress Party*.

21
22 Respondent entered the United States on December 20, 2010 at or near Laredo,
23 Texas, while walking through the desert. U.S. Customs & Border Patrol detained him on
24 December 22, 2010.

25 RESPONDENT'S PRE-HEARING STATEMENT - 2

1
2 On May 16, 2011, Respondent filed with the Immigration Court Form I-589,
3 Application for Asylum and for Withholding of Removal.

4 Respondent respectfully requests the Court for grant of his application for asylum
5 and for withholding of removal.

6 **I. PROCEDURAL HISTORY**

7 On December 20, 2010, Respondent entered the United States at or near Laredo,
8 Texas.

9 Respondent was encountered by U.S. Customs & Border Patrol, who detained him
10 on December 22, 2010.

11 On December 23, 2010, U.S. Customs & Border Patrol Agent Eric Flores
12 interviewed Respondent at the Carrizo Springs, Texas Border Patrol Station. Respondent
13 stated he entered the United States to “claim political asylum”. He also reported to Agent
14 Flores that the India police had arrested him for his religious affiliation.
15

16 On December 1, 2011, Immigration Judge David Ayala entered an Order changing
17 venue from Harlingen, Texas to New York, New York.

18 On January 5, 2011, Respondent participated in a Credible Fear Interview.
19 Asylum Officer Clifton Powell, ZHN085, and Supervisory Asylum Officer, Bryan
20 Hemming, found the Respondent to have a credible fear, based upon his political opinion.

21 On January 24, 2011, Immigration Judge Howard E. Achtsam denied
22 Respondent’s change in custody.
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1 On May 16, 2011, Respondent's Form I-589, Application for Asylum and for
2 Withholding of Removal was filed with the Harlingen, Texas Immigration Court.

3 On June 10, 2011, Respondent was released on bond of \$45,000.

4 On January 23, 2012, Immigration Judge Javier E. Balasquide entered an Order
5 changing venue from New York, New York to Seattle, Washington.

6 On or about May 3, 2013, Respondent filed his Declaration in Support of Form I-
7 589, Application for Asylum and for Withholding of Removal (declaration dated April 4,
8 2013).

9 On May 23, 2013, Respondent filed a Supplement of Supporting Documentation
10 for Form I-589, Application for Asylum and for Withholding of Removal, which included,
11 in part, witness declarations and medical records of Respondent related to medical
12 treatment he received for torture-related injuries, the basis for this application.

13 On June 24, 2013, the Court entered an Order granting DHS' Motion to
14 Administratively Close this matter.

15 On January 27, 2014, Immigration Judge Kenneth Josephson entered an Order
16 granting Respondent's Motion to Recalendar.

17 This matter is now scheduled for **Individual Hearing on December 9, 2015.**

18 The above-stated procedural history is a synopsis of records produced from FOIA
19 request. DHS has redacted pages from this FOIA, which prevents Respondent's counsel
20 from outlining other specific history of Respondent's immigration history. Any
21 portion(s) of the record not stated above is not specifically intended to be omitted, stated
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1 only to provide a synopsis for the Court and based upon the records and files available to
2 counsel for Respondent.

3
4 **II. STATEMENT OF THE ISSUES**

- 5 1. Has Respondent met the burden of proof to establish that he is a refugee as
6 defined in INA 101(a)(42)?
7 2. Has Respondent qualified his eligibility as a refugee because he suffered
8 past persecution *and* because he has a well-founded fear of future
9 persecution pursuant to 8 CFR § 1208.13(b)(1)?
10 3. Is Respondent eligible for humanitarian asylum?

11 **III. STATEMENT OF THE FACTS**

12 Respondent was born on April 18, 1981 in Patiala, Punjab, India.

13 Respondent is married to Navdeep Kaur and has a son, Indipal Singh (DOB:
14 09/09/2001), and twin daughters, Gudrilin Kaur (DOB: 01/26/2003), and Harleen Kaur
15 (DOB: 01/26/2003); all four currently reside in India.
16

17 Respondent completed 12 years of education in India.

18 While in India, Respondent was employed as a Retail Supervisor for a store in
19 Patiala, India. He was also a member of the *Kissan Union* in Punjab India.

20 Respondent also worked as a social worker, helping Indian women purchase
21 sewing machines to learn to sew, so they would have a means of employment and ability
22 to take care of themselves. This social work was in conflict with the *Congress Party* and
23 the followers of the guru *Sarse Wala* in India.
24

1 Respondent is Sikh; he has and continues to practice Sikhism.

2 Respondent is fluent in Punjabi. He also speaks, reads and writes English *fairly*
3 well, though his understanding of the English language is not always accurate.

4 ***Respondent requires a Punjabi interpreter for his Individual Hearing.***

5 On January 28, 2010, Respondent was approached and attacked by members and
6 followers of the guru *Sarse Wala* and *Congress Party*. There were approximately four or
7 five individuals. This occurred when Respondent was coming back from his in-laws'
8 village, where he had been visiting his wife's parents. These individuals approached
9 Respondent and started hitting him with their hands, threw him to the ground, and then
10 kicked him. This beating lasted 4-5 minutes, and then some of the villagers came upon
11 this incident and the perpetrators ran away, leaving Respondent beaten in the road. He
12 was brought to his family home, where he presented unconscious and beaten. His family
13 and his friend, Shyam Singh, took him to the local hospital for medical treatment.

14 During this beating, the perpetrators were yelling at the Respondent to stop his
15 social work and join their parties, or they would kill him.

16 As part of his social work, the Respondent would help indigent women in the
17 village(s) to obtain sewing machines, which helped these women develop a trade and
18 make money to support themselves.

19 While in India, Respondent was a member of the *Shiromani Akali Dal* political
20 party.

21 On February 25, 2010, members from these same opposition parties came to
22 Respondent's home, where they threatened him. There were two or three individuals that
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1 came to Respondent's home, who were met by Respondent's family, including
2 Respondent's wife and his parents, as Respondent was not home at the time. These
3 members told Respondent's family that Respondent better not participate in the March 5,
4 2010 cultural program for the *Akali Dal Amritsar* party; if he did he would not "survive"
5 on their next encounter with them.

6 The second time Respondent encountered harm in India was when he was
7 returning home from work one evening, between 11:00 p.m. and 11:30 p.m., on March 17,
8 2010. At this time, the India police stopped him; suddenly 4-5 individuals came out from
9 the field, threw the Respondent to the ground and began to beat him. The person who
10 stopped him was wearing an India police uniform. The individuals told Respondent he
11 had gone against their party and he would now suffer the consequences. Respondent
12 reported they beat him with Lathi weapons, which are used for Indian Stick Fighting.
13 During this beating one of his fingers was fractured and he suffered a deep wound to his
14 arm. This beating continued approximately 10-15 minutes. Respondent reported that one
15 of the individuals who were beating him heard a noise or noises; they became scared and
16 ran away. Someone dragged Respondent from the field to the main road and then took
17 him to the medical clinic/hospital and had his family contacted.

18 Respondent's parents and his wife attempted to file a Complaint with the India
19 police, but were declined and instructed to leave the police department. The India police
20 also told Respondent's parents and his wife that Respondent needed to stop his social
21 work. Respondent's friends, Kuldeep Singh, and Shamsher Singh, were also present
22 during this visit to the India police station.
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1 After this incident, Respondent fled and went to live with his sister in Samana
2 City, India. He lived there for one to two months and then went to Delhi, India, where
3 arrangements were made for him to leave India because he and his family could no longer
4 endure the threats of harm and actual harm Respondent had already suffered on three
5 occasions.

6 Respondent reports that he did report these incidents to the India police, but they
7 refused his claims of harm. His parent did try to file a complaint on their own with the
8 India police, but were also told to go away and would not hear nor take their Complaint or
9 provide Respondent with any form of safety. Respondent's friend, Jaswant Singh, was
10 with his parents at the police station when they tried to seek assistance and register their
11 complaint with the India police.

12 On September 28, 2010, Respondent fled India due to physical harm and threats of
13 death he received from following members of the guru *Sarse Wala* and members of the
14 *Congress Party*, which were continuing to escalate. This was a difficult decision for him,
15 as he had to leave his wife and three children. His participation in the Shiromani Akali
16 Dal party went to the essence of his spiritual practices as a Sikh: principles of equality of
17 all humans, rejection of discrimination on the basis of caste, creed, and gender, and living
18 life as a householder.

19 He flew from New Delhi, India to Sao Paulo, Brazil; he then flew from Sao Paulo,
20 Brazil to Lima, Peru; then from Lima, Peru to Quito, Ecuador; and lastly from Quito,
21 Ecuador to Guatemala City, Guatemala. He arrived in Guatemala City on or about
22 November 1, 2010 and stayed in a hotel for approximately 6-7 days.
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1 On or about November 7, 2010, Respondent reached Tapachula, Mexico by bus.
2 At that point, an unknown person took him and other individuals to this person's
3 "personal" house in Tapachula, Mexico and then to the Madrid Hotel in Tapachula,
4 Mexico.

5 A smuggler, whose name was said to be "Donker", blindfolded the Respondent,
6 and took him and other individuals in a vehicle to Mexico City, Mexico. He stayed in
7 Mexico City approximately two to three days and then took a bus to Nuevo Laredo,
8 Tamaulipas, Mexico. When he arrived, individual(s) he did not know and for whose
9 house he did not know transported him to a brick house near a railroad track. He was left
10 there with other individuals for approximately two to three days.

11 Some individuals arrived at the house and took Respondent and some of the
12 individuals to a bus station in Nuevo Laredo, Tamaulipas, Mexico; where they were taken
13 to another unknown location near the United States/Mexico border. Respondent then
14 walked to the river to cross into the United States. There were approximately 14-15
15 individuals (2-3 females; 11-12 males) at the river that crossed into the United States with
16 him.
17

18 He walked for approximately three days before he was directed to get into a truck
19 at an unknown location. He was in the truck for approximately 10 minutes before U.S.
20 Border Patrol agents apprehended him at or about Brundage, Texas. This occurred on
21 December 22, 2010.
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1 During the initial interview with CBP on December 22, 2010, Respondent claimed
2 his life would be in danger if he were to be returned to his native country of India. He
3 stated during the interview that he was claiming political asylum.

4 Respondent traveled alone from India until he reached Ecuador. He then met a
5 Mexican-appearing man in Tapachula, Mexico and paid him \$3,000 to be smuggled to
6 Houston, Texas. Respondent does not know this man's name. From there, Respondent
7 was to pay \$2,000 to get documents, so he could reside and work within the United States.

8 Respondent entered the United States on December 20, 2010 at or near Laredo,
9 Texas, while walking through the desert.

10 U.S. Immigration & Customs Enforcement report in their Record of
11 Deportable/Inadmissible Alien report (Form I-213), dated December 22, 2010, that U.S.
12 Customs & Border Patrol (CBP) encountered Respondent near Brundage, Texas at
13 approximately 8:00 p.m. At that time, Respondent was arrested and transported to the
14 Carrizo Springs Border Patrol Station for further processing.

15 U.S. Immigration & Customs Enforcement detained respondent on December 22,
16 2010.

17 Respondent underwent a credible fear interview on January 5, 2011, requesting
18 asylum in the United States. The USCIS officer established a "credible fear of
19 persecution".
20

21 He filed for asylum and for withholding of removal with the Immigration Court on
22 May 16, 2011.
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1 On February 19, 2013, Respondent's family reported that at about midnight they
2 were awakened by noises from outside. When they peered out the window of their home,
3 there were intruders holding sword-like weapons, wooden sticks trying to open the
4 entrance gate to their home. The gate was locked from the insides, so the intruders started
5 vandalizing the gate with their sword and making threats of harm to Respondent's family.
6 The family started screaming, the intruders fled. The family tried to file a complaint with
7 the India police, but again were turned away.

8 On August 7, 2013, Respondent's family was awakened at 2:00 a.m., again, by
9 intruders who showed sharp weapons in their hands. This time, Respondent's father
10 picked up his pistol and show 3-4 bullets in the air; the intruders fled. Respondent's
11 family reported the incident to the India police, but were told "if they come again kill
12 them." After this, Respondent's father put up razor-type wire around the top of their
13 fence/wall of their home. Despite this added protection, Respondent's family is still very
14 afraid not only for themselves, but should Respondent return to India further harm will be
15 cast on him and the other family members.

17 In May 2014, Respondent's wife and children tried to obtain passports from the
18 Government of India, Ministry of External Affairs, Regional Passport Office, Chandigarh,
19 India. His wife was issued a passport, but Respondent reports the Passport Office would
20 not issue his children passports, as his attendance was required. Respondent responded
21 with a notarized statement that his wife had permission to apply for passports for his
22 children, and the Regional Passport Office had his permission to provide passports for his
23 children. His wife asked for this request in writing, but was refused.
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IV. WITNESS LIST

Respondent anticipates calling the following witnesses in support of his Application for Asylum, Withholding of Removal, and protection under the Convention Against Torture:

1. **Daljit Singh, Respondent**

Respondent is expected to testify with regard to his Application for Asylum, Withholding of Removal and protection under the Convention Against Torture. He will also testify with regard to the evidence submitted in support of his application for asylum.

2. **Allison Ramsey, MS, Psychologist**

Ms. Ramsey is expected to testify with regard to her psychological evaluation of Respondent, including her findings and conclusions related to the psychological effects for which the Respondent suffers related to the torture that was inflicted on him while in India, which is the basis for his application for asylum and for withholding of removal.

3. **Nicole C. Ahrenholz, M.D.**

Dr. Ahrenholz is expected to testify with regard to her medical evaluation of Respondent, including her findings and conclusions related to the physical sequelae for which the Respondent suffers related to the torture that was inflicted on him while in India, which is the basis for his application for asylum and for withholding of removal.

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V. EXHIBIT LIST

Respondent submits the following as documentary evidence in support of his Form I-589, Application for Asylum & Withholding of Removal:

NO.	DOCUMENT
1.	Birth Certificate – Daljit Singh – <i>Unavailable</i>
2.	Birth Certificate – Gurleen Kaur (Respondent’s Daughter)

NO.	DOCUMENT
3.	Birth Certificate - Harleen Kaur (Respondent's Daughter)
4.	Birth Certificate – Inderpal Singh (Respondent's Son)
5.	Birth Certificate – Navdeep Kaur (Respondent's Wife) - <i>Unavailable</i>
6.	California Commercial Driver License
7.	Certificate of Recognition – Willacy Detention Center, dated April 20, 2011
8.	Court Records – Human Rights case in India for father of Respondent
9.	Declaration – Gurmail Singh, President, Kissan Union, Punjab, India
10.	Declaration – Iqbal Singh Tiwana, Political & Media Advisor, In-Charge Head Office, Shiromani Akali Dal (Amritsar)
11.	Declaration – Jaswant Singh
12.	Declaration – Kuldeep Singh
13.	Declaration – Mandeep Singh
14.	Declaration(s) – Manjit Kaur
15.	Declaration(s) – Mahinder Singh
16.	Declaration(s) – Navdeep Kaur (Respondent's Wife)
17.	Declaration – Prem Singh
18.	Declaration – Raghvir Singh (Witness to March 17, 2010 attack on Respondent)
19.	Declaration – Ranjit Kaur (Respondent's Sister)
20.	Declaration – Rawel Singh
21.	Declaration – Sandeep Singh

NO.	DOCUMENT
22.	Declaration – Shamsher Singh
23.	Declaration – Shyam Singh
24.	Declaration – Tejinder Singh (Respondent’s Brother-in-Law)
25.	Declaration of Daljit Singh, dated April 4, 2013
26.	Education Records
27.	Election Commission of India Identity Card – Shiromani Akali dal Amritsar
28.	Employment Authorization Card
29.	Form I-589, Application for Asylum and for Withholding of Removal
30.	Form I-831, Record of Deportable/Inadmissible Alien
31.	Form I-867A, Record of Sworn Statement in Proceedings Under Section 235(b)(1) of the Act
32.	Form I-867B, Jurat for Record of Sworn Statement in Proceedings Under Section 235(b)(1) of the Act
33.	Human Rights Watch 2013, India, pp. 314-322
34.	Human Rights Watch, <i>India: Punjab Case Shows Need for Anti-Torture Law</i> , September 27, 2012
35.	Human Rights Watch, January 2015
36.	India Government of Punjab Driving License
37.	Letter from Employer – “Private Firm”
38.	Medical Records
39.	Membership Card, Shiromani Akali Dal Party

NO.	DOCUMENT
40.	Membership Confirmation, Signed by Iqbal Singh Tiwana
41.	Notice to Appear
42.	Passport – Daljit Singh
43.	Passport – Gurleen Kaur - <i>Unavailable</i>
44.	Passport – Harleen Kaur - <i>Unavailable</i>
45.	Passport – Inderpal Singh - <i>Unavailable</i>
46.	Passport – Navdeep Kaur
47.	Pay Stub from <i>Aditya Birla Retail, Ltd.</i> , dated July 20, 2009
48.	Photographs – Family home after India police came looking for Respondent
49.	Photographs – Respondent, his wife and children
50.	Photographs – Respondent’s injuries related to torture while in India
51.	Psychological Evaluation – Allison Ramsey, MS
52.	Questions for Indian Nationals in ERO Custody
53.	Record of Determination/Credible Fear Worksheet
54.	Record of Deportable/Inadmissible Alien
55.	Record of Sworn Statement in Proceedings Under Section 235(b)(1) of the Act, Form I-867A
56.	Social Security Card
57.	Washington Commercial Driver License
58.	Medical Report/Affidavit – Nicole C. Ahrenholz, M.D.

1 Respondent objects to all evidence submitted to the Court by the Department,
2 unless and until the Respondent has examined the offered evidence and specifically
3 waives any objection.

4 Respondent reserves the right to offer additional testimony and/or documentary
5 evidence at the hearing for the purpose of rebuttal or impeachment.

6 See Immigration Court Practice Manual, Chapter 3.1(b)(ii)(A) (June 20, 2008)
7 (filing deadline “does not apply to exhibits or witnesses offered solely to rebut and/or
8 impeach”).

9 **VI. ESTIMATED TIME REQUIRED TO PRESENT RESPONDENT’S CASE**

10 Respondent anticipates approximately two (2) hours to present his case at the
11 Individual Hearing.

12 Additionally, Respondent requests the presence of a Punjab translator at this
13 hearing.
14

15 **VII. LEGAL ARGUMENT**

16 **1. Respondent has met the burden of proof to establish that he is a**
17 **refugee as defined in INA 101(a)(42)?**

18 Respondent has established that he is *unable* to return to, and *unable* to avail
19 himself of the protection of his country because of past persecution and fear of future
20 persecution if removed due to Respondent’s “membership” in the political party,
21 *Shiromini Akali Dal* party. This is shown in the evidence of three attacks savagely
22 inflicted on the Respondent for his political and social practices, which neither caused
23 harm on another person, He has also tried to live elsewhere in India, including Samana
24

1 City, India. Additionally, Respondent's family attempted to make a claim with the India
2 police after one of the attacks and were swiftly rejected.

3 Section 208 of the INA authorizes the granting of asylum to individuals who are
4 physically present or arriving in the United States, *regardless of their status*, and who
5 meet the definition of refugee. *See also*, 8 USC § 1158.

6 The "nonrefoulement" provision of the Refugee Act, previously known as
7 withholding of deportation, provides protection to individuals whose lives or freedom
8 "would be threatened" on account of race, *religion*, nationality, *membership in a*
9 *particular social group*, or *political opinion* if returned to their home countries. This
10 provision, previously INA §243(h), 8 USC §1253(h), was revised by IIRAIRA and is now
11 found at INA § 241(b)(3), 8 USC §1231(b)(3)(B). The provision is now referred to as
12 withholding of removal or restriction on removal.

13
14 The regulations provide that an applicant has a "well-founded fear of persecution"
15 if:

- 16 1. The applicant has a *fear of persecution* in his or her country of nationality
17 or, if stateless, in his or her country of last habitual residence, on account of
18 race, religion, nationality, membership in a particular social group, or
19 political opinion;
- 20 2. There is a *reasonable possibility of suffering such persecution if he or she*
21 *were to return to that country*; and
- 22 3. He or she is *unable* or unwilling to return to, or avail him – or herself of the
23 protection of, that country.
24

1 [Emphasis added]. *See* 8 CFR §§ 208.13(b)(2)(i), 1208.13(b)(2)(i).

2 Respondent has substantiated all aspects of his past persecution and credible fear(s) for
3 returning to India – in both his application for asylum and for withholding of removal and
4 his supporting documentation.

5 **2. Respondent has qualified his eligibility as a refugee because he**
6 **suffered past persecution *and* because he has a well-founded fear of**
7 **future persecution; 8 CFR § 1208.13(b)(1)?**

8 The fact that Respondent previously established a credible fear of persecution for
9 purposes of INA 235(b)(1)(B), by providing a lengthy statement to Eric Flores, U.S.
10 Customs & Border Patrol Agent, and Asylum Officer Clifton Powell, describing his flee
11 from India and the beatings, torture and abuse he endured - does not relieve him of the
12 additional burden of establishing eligibility for asylum. *See* 8 CFR §1208.13(a).
13 Respondent's eligibility *is* predicated on his statement(s) and supporting documentation of
14 having suffered past persecution *and* his well-founded fear of future persecution if
15 removed to India. Through this evidence, he has established a solid foundation for
16 refugee status, thus asylum eligibility.

17
18 There is a preponderance of evidence to establish that there are compelling reasons
19 why the Respondent cannot return to India due to the severity of past persecution and
20 serious harm upon removal to India. Therefore, the burden of proof lies with the
21 Department to disprove. *See* 8 CFR § 1208.13(B)(ii) and (iii).

1 The Respondent requests the court consider him eligible for withholding of
2 removal under the Convention Against Torture, as the evidence provided shows that the
3 Respondent may be tortured in “the country of removal.” See 8 CFR § 1208.13(C).

4 **3. Respondent requests grant of humanitarian asylum.**

5 There are two distinct paths to humanitarian asylum. An applicant who suffered
6 only the “normal” amount of past persecution *remains eligible* for asylum in the absence
7 of a well-founded fear, if there is a reasonable possibility that he or she will suffer other
8 serious harm upon removal. See *Chieh v. Holder*, No. 09-4183 (6th Cir. Jan 4, 2011)
9 (unpublished).

10 Humanitarian asylum is a form of relief, which is a viable form of relief where an
11 alien’s severe past persecution has had long-term effects or wherein the alien suffered
12 other “serious” harm not on account of his or her race, religion, nationality, membership in
13 a particular social group or political opinion.

14 Respondent in this matter suffered at the hands of the following members of the
15 guru *Sarse Wala* and members of the *Congress Party*. His family sought safety from the
16 India police, but were quickly turned down.

17 Respondent fled India to avoid further beatings and torture. Where an alien has
18 demonstrated that he or she has suffered past persecution and Department of Homeland
19 Security (DHS) has rebutted the presumption of future persecution, an alien can still be
20 granted asylum:
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- 1 1. Where he demonstrates compelling reasons for being unwilling or unable
2 to return to the designated country based on the severity of the past
3 persecution; or
- 4 2. Where he demonstrates the *reasonable possibility* that he will suffer other
5 serious harm if he is removed to the designated country.

6 In *Matter of Chen*, 20 I. & N. Dec. 16 (B.I.A. 1989), the BIA referred to the
7 “general humanitarian principle” in paragraph 136 of the UNHCR Handbook on
8 Procedures and Criteria for Determining Refugee Status under the 1951 Convention and
9 the 1967 Protocol Relating to the Status of Refugees. The BIA found that the alien had
10 suffered severe past persecution, including physical and mental abuse, during the Chinese
11 Cultural Revolution on *account of his family* and their strong religious beliefs, but did not
12 have a well-founded fear of future persecution. The BIA, however, granted asylum based
13 on the *severity* of the alien’s past persecution in the exercise of its discretion.

14 Respondent has been a victim of two (2) brutal attacks (January 28, 2010; March
15 17, 2010). The attorney general has discretion to grant asylum to petitioners who have
16 “suffered under atrocious forms of persecution, even where there is little likelihood of
17 future persecution”, *Ben Hamida v. Gonzales*, 478 F.3d 734, 740 (6th Cir. 2007) (quoting
18 *Matter of Chen*, 20 I&N Dec. 16, 19 (1989)).

19 Respondent has a pending asylum application based on the torture he received by
20 members and followers of the guru, *Sarse Wala*, and *Congress Party* because of his
21 political membership with the *Shiromani Akali Dal* party and his social work within his
22 community. See *Matter of Acosta*, 19 I&N Dec. 211 (BIA 1985), which held that the
23 community. See *Matter of Acosta*, 19 I&N Dec. 211 (BIA 1985), which held that the
24 community. See *Matter of Acosta*, 19 I&N Dec. 211 (BIA 1985), which held that the
25 community.

1 common characteristic for membership in a particular social group for asylum should be
2 one that the *members of the group* cannot change, or *should not be required to change*
3 because it is fundamental to identity or conscience. In *Matter of C-A*, 23 I&N Dec. 951, it
4 found that an important consideration is the “social visibility” of the members of the
5 particular group. In addition, *Matter of S-E-G*, 24 I&N Dec. 579 (BIA 2007), the Board of
6 Immigration Appeals required that the group must be “particular” – that is, distinct and
7 recognizable in the society. Respondent’s membership in the *Shiromani Akali Dal* party
8 and his social service activity, particularly in assisting women in obtaining sewing
9 machines and being taught to sew in order to support themselves, has shown to be a
10 certain conflict of interest with followers of the guru *Sarse Wala* and *Congress Party*
11 members. Respondent’s social work and political involvement in an effort to promote
12 humanitarian relief to those less fortunate is fundamental to Respondent’s social and
13 religious values; these are fundamental to his spiritual and natural identity and conscience.

14
15 The framework of 8 C.F.R § 1208.13(b)(1) must be followed to properly evaluate
16 an asylum claim. Under the regulation, the presumption of a well-founded fear arises
17 when past persecution has been shown and how the burden of proof *then shifts to the DHS*
18 to rebut the presumption.

19 Respondent has met the threshold for a grant of asylum.

20 VI. CONCLUSION AND REQUEST FOR RELIEF

21 Considering the totality of the evidence presented by Respondent, the Respondent
22 requests the Court:

- 23 1. Warrant a favorable exercise of discretion and *grant Respondent asylum*.

24
25 RESPONDENT’S PRE-HEARING STATEMENT - 21

CERTIFICATE OF SERVICE

I, William Frick, the undersigned, declare:

That I am the attorney for Respondent, *Daljit Singh*.

My business address is:


Law Office of William Frick
Chase Bank Building
7900 SE 28th Street, Suite 500
Mercer Island, WA 98040

I served the original/true copy of the attached *Respondent's Pre-Hearing Statement*, by placing a true copy in an envelope, which was then sealed, with postage fully paid thereon, and was this day addressed as follows:

Clerk of the Court
Immigration Court
1000 Second Avenue, Suite 2500
Seattle, WA 98104

Chief Counsel
Department of Homeland Security
Immigration & Customs Enforcement
1000 Second Avenue, Suite 2900
Seattle, WA 98104

DATED this 30 day of November 2015.



William Frick
701 Millennium Tower
719 Second Avenue
Seattle, WA 98104

206 286 0167 (tel.)
206 770 7216 (fax)
william@fricklawfirm.info

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Exhibit 1

Daljit Singh

Birth Certificate - Unavailable

Exhibit 2

Birth certificate issuing authority-2003

Form no-9 (See rule 9/14)



BIRTH CERTIFICATE

This is Certify that information given below is taken from original records according to year 2003 which is registered in local Registrar birth & death City Council Sanour Tehsil Patiala district Patiala.

Name Gurleen Kaur registration No-27 Sex Female (male/ female) Date of Registration 29-01-2003 Place of Birth Sanour Date of birth 26-01-2003 mother's Name Navdeep Kaur Mother/Father's Complete Address Khansian road Sanour Father's Name Daljit Singh S/o Mohinder Singh.

Signature of Certificate Preparing Office

Signature of Certificate issuing Officer

Name Sunita Arora

Stamp _____

Designation Clerk

Dated _____

Note: this certificate has been issued under Birth & Death Registration Act 1969 (Govt. Of India) section 12.

VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

ਜਨਮ ਸਰਟੀਫਿਕੇਟ ਜਾਰੀ ਕਰਨ ਸਬੰਧੀ ਕੌਮੀ ਮੁਹਿਮ - 2003

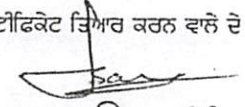


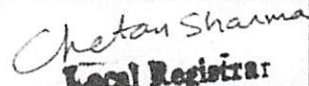
ਫਾਰਮ ਨੰਬਰ: 9 (ਵੇਖੋ ਰੂਲ 9/14)



ਜਨਮ ਦਾ ਸਰਟੀਫਿਕੇਟ

ਇਹ ਤਸਦੀਕ ਕੀਤਾ ਜਾਂਦਾ ਹੈ ਕਿ ਹੇਠ ਲਿਖੀ ਸੂਚਨਾ ਅਸਲ ਜਨਮ ਰਿਕਾਰਡ ਬਾਬਤ ਸਾਲ 2000 ਵਿੱਚੋਂ ਲਈ ਗਈ ਹੈ ਜਿਹੜੀ ਕਿ ਲੋਕਲ ਰਜਿਸਟਰਾਰ ਜਨਮ ਤੇ ਮੌਤ ਨਗਰ ਫੋਸਟ ਸਕੇਂਡ ਤਹਿਸੀਲ ਪਾਇਆੜਾ ਜਿਲ੍ਹਾ ਪਾਇਆੜਾ ਪੰਜਾਬ ਦੇ ਰਜਿਸਟਰ ਵਿੱਚ ਦਰਜ ਹੈ।
 ਨਾਮ ਇਰਫਾਨ ਜਿਲ੍ਹਾ ਰਜਿਸਟਰੇਸ਼ਨ ਨੰਬਰ 2114 ਲਿੰਗ ਮੁਰਦਾ (ਲੜਕਾ/ਲੜਕੀ)
 ਰਜਿਸਟਰੇਸ਼ਨ ਦੀ ਮਿਤੀ 29-9-2000 ਜਨਮ ਆਸਥਾਨ ਸਕੇਂਡ
 ਜਨਮ ਦੀ ਮਿਤੀ 9-9-2000 ਮਾਤਾ ਦਾ ਨਾਮ ਨਜ਼ੀਹ ਕੌਰ
 ਮਾਤਾ-ਪਿਤਾ ਦਾ ਪੂਰਾ ਪਤਾ ਪਾਂਡੀਆਂ ਹੋਲ ਸਕੇਂਡ
 ਪਿਤਾ ਦਾ ਨਾਮ ਅੰਮਰਿਤ ਸਿੰਘ ਸਪੁਤਰ ਮੁਖੀਆ ਸਿੰਘ

ਸਰਟੀਫਿਕੇਟ ਤਿਆਰ ਕਰਨ ਵਾਲੇ ਦੇ ਹਸਤਾਖਰ

 ਨਾਮ ਪਿਆਰਾ ਸਿੰਘ
 ਅਹੁਦਾ ਨੋਟਰੀ ਪਬਲਿਕ

ਸਰਟੀਫਿਕੇਟ ਜਾਰੀ ਕਰਨ ਵਾਲੇ ਦੇ ਹਸਤਾਖਰ

Local Registrar
Birth & Death
 ਮਿਤੀ SANAUR

ਨੋਟ :- ਇਹ ਜਨਮ ਸਰਟੀਫਿਕੇਟ ਜਨਮ ਅਤੇ ਮੌਤ ਰਜਿਸਟਰੇਸ਼ਨ ਐਕਟ 1969 (ਭਾਰਤ ਸਰਕਾਰ) ਦੀ ਧਾਰਾ 12 ਦੇ ਅਧੀਨ ਜਾਰੀ ਕੀਤਾ ਗਿਆ।

146/RCI/ND/03-10,00,000 Issue - Oct '03-MCI2RP/Chp.,

Certified to be true Photocopy
of the Original

NOTARY
PATIALA (Pb.) India

9 FEB 2013

Exhibit 3

D.H.P 368

Form no-9 (See rule 9/14)

Serial Mark-E

Registration Page No- 118



BIRTH CERTIFICATE

This is Certify that information given below is taken from original records according to year **2003** which is registered in local Registrar birth & death City Council Sanour Tehsil Patiala district Patiala.

Name Harleen Kaur registration No-27 Sex Female (male/ female) Date of Registration 29-01-2003 Place of Birth Sanour Date of birth 26-01-2003 mother's Name Navdeep Kaur Mother/Father's Complete Address Khansian road Sanour Father's Name Daljit singh S/o Mohinder singh.

Signature of Certificate Preparing Office

Signature of Certificate issuing Officer

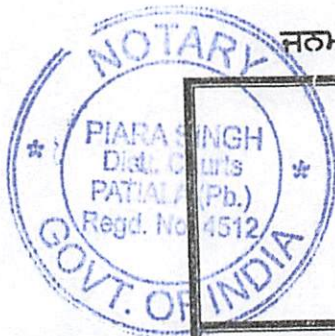
Name Sunita Arora

Stamp _____

Designation Clerk

Dated _____

Note: this certificate has been issued under Birth & Death Registration Act 1969 (Govt. Of India) section 12/17.



ਜਨਮ ਸਰਟੀਫਿਕੇਟ ਜਾਰੀ ਕਰਨ ਸਬੰਧੀ ਕੌਮੀ ਮੁਹਿਮ - 2003



ਜਨਮ ਦਾ ਸਰਟੀਫਿਕੇਟ

ਫਾਰਮ ਨੰਬਰ: 9 (ਵੇਖੋ ਰੂਲ 9/14)

VALID FOR FOREIGN COUNTRY OUT SIDE INDIA EMBASSIES

ਇਹ ਤਸਦੀਕ ਕੀਤਾ ਜਾਂਦਾ ਹੈ ਕਿ ਹੇਠ ਲਿਖੀ ਸੂਚਨਾ ਅਸਲ ਜਨਮ ਰਿਕਾਰਡ ਬਾਬਤ ਸਲਾਹਕਾਰ
 ਵਿੱਚੋਂ ਲਈ ਗਈ ਹੈ ਜਿਹੜੀ ਕਿ ਲੋਕਲ ਰਜਿਸਟਰਾਰ ਜਨਮ ਤੇ ਮੌਤ ਨਤਾਨ ਕੋਲੋਂ ਲਈ
 ਤਹਿਸੀਲ ਪਟਿਆਲਾ ਜਿਲ੍ਹਾ ਪਟਿਆਲਾ ਪੰਜਾਬ ਦੇ ਰਜਿਸਟਰ ਵਿੱਚ ਦਰਜ ਹੈ।
 ਨਾਮ ਗੁਰਜੀਤ ਕੌਰ ਰਜਿਸਟਰੇਸ਼ਨ ਨੰਬਰ 97 ਲਿੰਗ ਝੜੀ (ਲੜਕਾ/ਲੜਕੀ)
 ਰਜਿਸਟਰੇਸ਼ਨ ਦੀ ਮਿਤੀ 29-1-03 ਜਨਮ ਅਸਥਾਨ ਪਾਤੀਆਂ ਰੋਡ, ਕਸ਼ਿਰ
 ਜਨਮ ਦੀ ਮਿਤੀ 26-1-03 ਮਾਤਾ ਦਾ ਨਾਮ ਨਵਰੀਪ ਕੌਰ
 ਮਾਤਾ-ਪਿਤਾ ਦਾ ਪੂਰਾ ਪਤਾ ਪਾਤੀਆਂ ਰੋਡ, ਕਸ਼ਿਰ
 ਪਿਤਾ ਦਾ ਨਾਮ ਕੁਲਦੀਪ ਸਿੰਘ ਸਪੁਰਦ ਗੁਰਦੇਵ ਕੌਰ

[Signature]
 ਸਰਟੀਫਿਕੇਟ ਤਿਆਰ ਕਰਨ ਵਾਲੇ ਦੇ ਹਸਤਾਖਰ

ਸਰਟੀਫਿਕੇਟ ਜਾਰੀ ਕਰਨ ਵਾਲੇ ਦੇ ਹਸਤਾਖਰ

ਨਾਮ ਗੁਰਦੇਵ ਕੌਰ
 ਅਹੁਦਾ ਕੌਰ

Chetan Sharma
 ਮੁਹਰ **Local Registrar**
Birth & Death
 ਮਿਤੀ 29/1/03
PATIALA

ਨੋਟ :- ਇਹ ਜਨਮ ਸਰਟੀਫਿਕੇਟ ਜਨਮ ਅਤੇ ਮੌਤ ਰਜਿਸਟਰੇਸ਼ਨ ਐਕਟ 1969 (ਭਾਰਤ ਸਰਕਾਰ)
 ਦੀ ਧਾਰਾ 12 ਦੇ ਅਧੀਨ ਜਾਰੀ ਕੀਤਾ ਗਿਆ।

146/REG/HS/03-10,00,000 Loose - Oct '03-INDIAN/CH/4.

Deemed to be true Photocopy
 of the Original

[Signature]
 NOTARY
 PATIALA (Pb.) India

- 9 FEB 2013

Exhibit 4

Birth certificate issuing authority-2003

Form no-9 (See rule 9/14)



BIRTH CERTIFICATE

This is Certify that information given below is taken from original records according to year 2000 which is registered in local Registrar birth & death City Council Sanour Tehsil Patiala district Patiala.

Name inderpal singh registration No-244 Sex Male (male/ female) Date of Registration 09-09-2000 Place of Birth Sanour Date of birth 09-09-2000 mother's Name Navdeep Kaur Mother/Father's Complete Address Khansian road Sanour Father's Name Daljit singh S/o Mohinder singh.

Signature of Certificate Preparing Office

Signature of Certificate issuing Officer

Name Jaswinder Singh

Stamp _____

Designation Inspector

Dated _____

Note: this certificate has been issued under Birth & Death Registration Act 1969 (Govt. Of India) section 12.



ਡੀ.ਪੀ.ਐਚ. 368
ਕ੍ਰਮਬੰਧਿਤ-੯

ਫਾਰਮ ਨੰ : 5 (ਵੇਖੋ ਰੂਲ 8)
ਰਜਿਸਟਰ ਦਾ ਸਫਾ ਨੰਬਰ 118...

ਜਨਮ ਦਾ ਸਰਟੀਫਿਕੇਟ

ਇਹ ਤਸਦੀਕ ਕੀਤਾ ਜਾਂਦਾ ਹੈ ਕਿ ਹੇਠ ਲਿਖੀ ਸੂਚਨਾ ਅਸਲ ਜਨਮ ਰਿਕਾਰਡ ਵਿੱਚੋਂ ਲਈ ਗਈ ਹੈ ਜਿਹੜੀ ਕਿ ਲੋਕਲ ਰਜਿਸਟਰਾਰ ਜਨਮ ਤੇ ਮੌਤ ਪਤਾਲਾ ਡਿਵੀਜ਼ਨ, ਕਸਬਾ ਤਹਸੀਲ, ਪਤਾਲਾ ਜਿਲ੍ਹਾ ਪਤਾਲਾ ਬਾਬਤ ਸਾਲ ੨੦੦੩ ਦੇ ਰਜਿਸਟਰ ਵਿੱਚ ਦਰਜ ਹੈ।

ਨਾਮ ਰੁਕਮਿਣੀ ਕੌਰ ਰਜਿਸਟਰੇਸ਼ਨ ਨੰਬਰ ੨7

ਲਿੰਗ ਔਰਤੀ (ਲੜਕਾ/ਲੜਕੀ) ਰਜਿਸਟਰੇਸ਼ਨ ਦੀ ਮਿਤੀ ੨੧-1-੦੩

ਜਨਮ ਅਸਥਾਨ ਪਤਾਲਾ ਡਿਵੀਜ਼ਨ, ਕਸਬਾ ਜਨਮ ਦੀ ਮਿਤੀ ੨6-1-੦੩

ਮਾਤਾ ਦਾ ਨਾਮ ਰੁਕਮਿਣੀ ਕੌਰ ਮਾਤਾ/ਪਿਤਾ ਦਾ ਪੂਰਾ ਪਤਾ ਪਤਾਲਾ ਡਿਵੀਜ਼ਨ, ਕਸਬਾ

ਪਿਤਾ ਦਾ ਨਾਮ ਰੁਕਮਿਣੀ ਕੌਰ ਸਪੁਰਤ ਪਤਾਲਾ ਡਿਵੀਜ਼ਨ, ਕਸਬਾ

ਸਰਟੀਫਿਕੇਟ ਤਿਆਰ ਕਰਨ ਵਾਲੇ ਦੇ ਹਸਤਾਖਰ



ਸਰਟੀਫਿਕੇਟ ਜਾਰੀ ਕਰਨ ਵਾਲੇ ਦੇ ਹਸਤਾਖਰ

ਨਾਮ ਰੁਕਮਿਣੀ ਕੌਰ
ਔਰਤਾ ਕੌਰ

Piara Singh
ਲੋਕਲ ਰਜਿਸਟਰਾਰ
ਮੁਹਰ
ਜਨਮ ਅਤੇ ਮੌਤ
ਮਿਸਟਰ ਪਤਾਲਾ
23/1/08

ਨੋਟ :- ਇਹ ਜਨਮ ਸਰਟੀਫਿਕੇਟ ਜਨਮ ਅਤੇ ਮੌਤ ਰਜਿਸਟਰੇਸ਼ਨ ਐਕਟ 1969 (ਭਾਰਤ ਸਰਕਾਰ) ਦੀ ਧਾਰਾ 12/17 ਦੇ ਅਧੀਨ ਜਾਰੀ ਕੀਤਾ ਗਿਆ।

Declared to be true Photocopy of the Original

NOTARY PATIALA (Pb.) India

- 9 FEB 2013

Exhibit 5

Navdeep Kaur

Birth Certificate - Unavailable

PUNJAB STATE HUMAN RIGHTS COMMISSION

COMPLAINT NO :16794/15/2004

Present:- Shri Mohinder Singh the complainant in person.

Shri Mohinder Singh is present today and has been supplied with a copy of the report dated 14.03.2005 of SSP Patiala received from ADGP/Law and Order-cum-Human Rights, Punjab dated 09.05.2005. The complainant, however, submits that the matter is **sub judice** and he shall abide by the order of the court. He, however, also states that the local police keeps on harassing him and issuing all kinds of threats that he may be implicated in false cases.

In view of the statement made by the complainant that the matter is **sub judice** and that he would abide by the order of the court, Commission shall not like to proceed further with the matter. However, Commission shall also expect that the SSP Patiala shall ensure that the complainant is dealt with strictly in accordance with law and that his rights relating to life, liberty, equality and dignity shall not be jeopardized by any public servant.

With these observations, the case is **disposed of**.

A copy of this order shall be sent forthwith by special messenger to **ADGP/Law and Order-cum-Human Rights, Punjab as well as UPC to SSP Patiala for compliance.**

A copy of this order along with copy of the said document shall be given **DASTI to the complainant.**

Dated 10.05.2005
Khera


(N.K.ARORA)
MEMBER

N.K.
10/5/05

The Addl. Director General of Police,
Law & Order-cum-Human Rights,
Punjab, Chandigarh.

PUNJAB STATE HUMAN RIGHTS COMMISSION
CHANDIGARH
03 MAY 2005
Diary No. 15948/CR/2005

To

The Principal Secretary,
Pb. State Human Rights Commission,
Chandigarh.

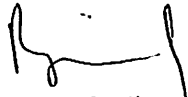
Ref. 11993 A.D. dated, Chandigarh the: 9-5-2005

Subject: - Complaint No. 16294/15704 filed by
Subj. Sh. Mohinder Singh of PTA

Re:

Kindly refer to your office memo No. 22276 dated 11/05 on the subject named above.

As per your directions, the inquiry has been got made from SSI/Retalor. His report has been received and the same is being sent herewith for your kind perusal, please.


for Addl. Director General of Police,
Law & Order-cum-Human Rights,
Punjab, Chandigarh.
u

Encl: As above.

Exhibit 9



CONSORTIUM OF INDIAN FARMERS ASSOCIATIONS
REGN NO. 55078/2006

Sanat Mehta
Chairman

P. Chengal Reddy
Secretary General

Satnam Singh Behru
President Punjab
(M) 98141-49077

TO WHOM IT MAY CONCERN

This is state that Daljit Singh S/o Mohinder Singh is a resident of Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA) now residing in 2356 15th Ave South, Apt-304, Seattle, WA-98144. He is permanent member of Kissan Union, Punjab, which is struggling peacefully and democratically for the rights of Sikhs and farmers, our party also works for take care and management of Gurudwaras (Sikh Temples). Daljit Singh also works for us from his village so why the Congress Party and the Sarsewala political group did not like Daljit's social work. Due to this he also suffered persecution and tortured by them. If Daljit Singh sent back to India, he will be risks harassment, torture and death. So, we appeal to the immigration authorities to grant stay to Daljit Singh.

Senior Vice President (Pb.)
Indian Farmers Associations (CIFA)
BOSAR *Gurmail Singh*

Dated:

President
Kissan Union Punjab,
INDIA.

Head Office Address :-

Satnam Singh Behru
Vill & P.O. Behru
Teh. & Distt. Patiala (Pb.)
(M) 98141-49077
98880-72753

Delhi Address :-

B/32, South Patel Nagar, 1st Floor,
New Dehli - 110008
Tel : 011-32474931, 25842111, 24505048
Fax : 011-25842123
Email : cifa_delhi@yahoo.com
Email : chengal@indianfarmers.com
Website : www.indianfarmers.org

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Exhibit 10

ੴ ਸਤਿਗੁਰ ਪ੍ਰਸਾਦਿ ॥

ਸ਼੍ਰੋਮਣੀ ਅਕਾਲੀ ਦਲ



ਨਾ ਅਸੀਂ ਹਿੰਦੂ ਨਾ ਮੁਸਲਮਾਨ ਸਾਡੀ ਮੰਜਿਲ ਖਾਲਿਸਤਾਨ
SHIROMANI AKALI DAL

PRESIDENT : S. SIMRANJIT SINGH MANN

ਮੁੱਖ ਦਫ਼ਤਰ
ਕਿਲ੍ਹਾ ਸ: ਹਰਨਾਮ ਸਿੰਘ
ਜ਼ਿਲ੍ਹਾ ਫਤਹਿਗੜ੍ਹ ਸਾਹਿਬ
ਪਿੰਨ ਕੋਡ-140406
ਪੰਜਾਬ (ਇੰਡੀਆ)
ਟੈਲੀਫੋਨ : 0091-1763-233764

HEAD OFFICE
QUILLA S.HARNAM SINGH
DISTT. FATEHGARH SAHIB
PIN CODE 140406
PANJAB (INDIA)
TELEFAX : 0091-1763-233764

No. SAD/5073/2012

Dated : May 29th , 2012
Quilla S. Harnam Singh.
Fatehgarh Sahib.

TO WHOM IT MAY CONCERN

This is to certified that that S. Daljit Singh S/o S. Mohinder Singh resident of Village & Post Office Sanaur, Tehsil & District Patiala, Punjab (India) is an active member of Shiromani Akali Dal Amritsar He has been participated in activities of the party and arrested so many times. Now he is residing at APT 304, 2356 15TH AVENUE S SEATTLE, WASHINGTON- 98144 U.S.A. He has been also support in our meetings, rallies and demonstration against violation of Human Rights and Atrocities on Sikh's in Punjab. Due to demonstration programme of our party, many times he and his family members faced harassment by Punjab Police S. Daljit Singh was forced to flee the country.

It is well known fact that the members of this party including our party president S. Simranjit Singh Mann have been suffering at the hands of Indian Government and a large number of our party workers have fled from India to avoid future persecution. So many members were killed in false encounters by the Punjab Police and their dead bodies were hastily cremated as unclaimed. Many are still languishing in jails. The police arrested our respected president unlimited number of times and he was kept in jail for long period of time. While he was in custody he was harassed and mistreated. When our president raised the voice of Sikh Freedom , government arrested him and put him in jail.

Should S. Daljit Singh return to India to adopt a normal life, it is more than likely that he would be persecuted by the government agencies. He may be kept in illegal confinement or be eliminated like many other activities , who have been killed in the name of fighting of the insurgency -lending support to the formation of Khalistan or freedom for the Sikhs . As such I would recommend S. Daljit Singh be given political asylum as per the just and liberal laws of your country in accordance with UN charter.



Iqbal Singh
29X06X12
(IQBAL SINGH TIWANA)
Political & Media Advisor.
&

Incharge Head Office.
Shiromani Akali Dal (Amritsar).

Iqbal Singh Tiwana
Political & Media Advisor
&

Incharge Head Office
Shiromani Akali Dal (Amritsar)

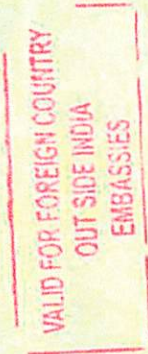
Exhibit 11



DECLARATION OF JASWANT SINGH

I, JASWANT SINGH S/o SURJIT SINGH, R/o V.P.O. Bhunerheri Tehsil & District PATIALA, PUNJAB (INDIA) declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Rahgbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know well Daljit Singh, he also worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.



54
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Exhibit 6

CALIFORNIA COMMERCIAL DRIVER LICENSE

DL **F4963472**

EXP **04/18/2017**

LN **SINGH**

FN **DALJIT**

1691 CHINOOK RD
W SACRAMENTO, CA 95691

DOB **04/18/1981**

RSTR NONE

CLASS A
END NONE

SEX M HAIR BLK EYES BRN

HGT 5'-04" WGT 175 lb

ISS **12/07/2012**

DD 11/07/201255717/29FD17

04181981



Exhibit 7



Certificate of Recognition

Willacy Detention Center Recognizes

Dajit Singh

*For your outstanding performance, motivation and commitment to the
Voluntary Work Program- Kitchen Services*

April 20, 2011



R. G. G. G.
R. G. G. G. Associate Warden

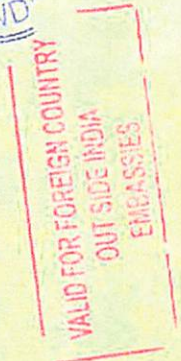
Exhibit 8

3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.

4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.

5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening his family.



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OUT SIDE INDIA
EMBASSIES

7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.



I do not read or speak English. My declaration has been translated to me in Punjabi, and affirm it is true and correct.

DATED this _____ day of 28- 01- , 2013

The Contents of this Affidavit/ document have been read over to the deponent He/She has accepted it true & Correct

Jaswant Singh

JASWNAT SINGH



I, _____, am fluent in both Punjabi and English. I have translated the above to Jaswant Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this _____ day of 28- 01- 2013

Print Name

Identify the person who is signing in which language personally

Indira

ATTESTED
S
NOTARY PUBLIC
PATIALA (Pb) INDIA

29 JAN 2013

10/15/20
2592
2650
29.1.63

VIVEK KUMAR
Stamp Vendor
DGM Centre
Pune


ELECTION COMMISSION OF INDIA
IDENTITY CARD
 ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 ਸਮਝੌਤਾ ਕਾਰਡ

JTW1223692



Elector's Name : JASWANT SINGH
 ਚੋਣਕਾਰ ਦਾ ਨਾਮ : ਜਸਵੰਤ ਸਿੰਘ
 Father's Name : SURJIT SINGH
 ਪਿਤਾ ਦਾ ਨਾਮ : ਸੁਰਜੀਤ ਸਿੰਘ
 Sex : Male
 ਲਿੰਗ : ਮਰਦ
 Age as on 11/2003 : 20 Years
 11/2003 ਤੋਂ ਉਮਰ : 20 ਸਾਲ

JTW1223692

Address: H No. 100, BHUNERHERHI
 TEH. PATIALA, DISTT. PATIALA
 ਘਰ ਨੰ: 100 ਭੁਨੇਰਹੇਰੀ
 ਤਹਿਸੀਲ ਪਟਿਆਲਾ, ਜਿਲ੍ਹਾ ਪਟਿਆਲਾ

Facsimile Signature of the
 Electoral Registration Officer
 for Constituency 093 - BAKALA

073 - ਫੁਕਾਲਾ ਵਰ ਖੇਤਰ ਦੇ
 ਚੋਣਕਾਰ ਰਜਿਸਟਰੇਸ਼ਨ ਅਫਸਰ ਦੇ
 ਹਸਤਾਖਰ ਦਾ ਚਿੱਕਾ ਚਿੱਕਾ ਚਿੱਤਰ

Place: PATIALA Date : 08/09/2003
 ਜਾਂ : ਪਟਿਆਲਾ ਮਿਤੀ : 08/09/2003

This Card may be used as an Identity Card
 Under different Government Schemes

ਇਸ ਕਾਰਡ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਕੀਮਾਂ ਲਈ
 ਸਨਾਖਤੀ ਕਾਰਡ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।

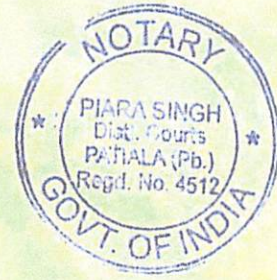
216

118

Suraj Singh

58
69

Exhibit 12



DECLARATION OF KULDEEP SINGH

I, KULDEEP SINGH S/o JOGINDER SINGH, R/o Bolar Road, V.P.O. Sanour, Tehsil & District PATIALA, PUNJAB (INDIA) declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Raghbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know very well Daljit Singh, who worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party.

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OUTSIDE INDIA
EMBASSIES

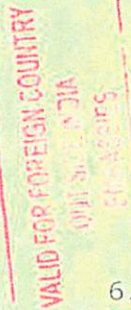
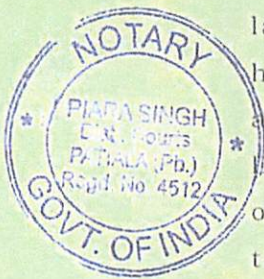
This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.

3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.

4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.

5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the



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OUT SIDE INDIA
EMBASSIES

police and Congress Party were also threatening his family.

7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.



8. I read or speak English very well. My declaration is affirm and it is true and correct.

DATED this _____ day of 22 01, 2013

Kuldeep Singh
KULDEEP SINGH

The Contents of this Affidavit document have been read over to the deponent *Kuldeep Singh* has accepted it true & Correct

Identify the person to whom I know personally



notary

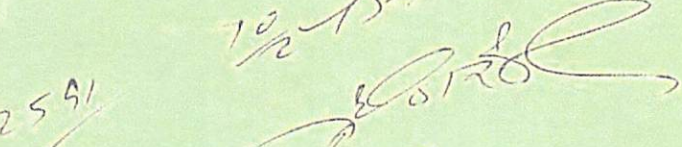
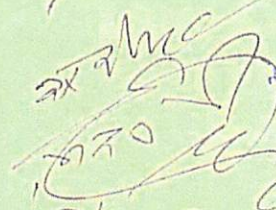
ATTESTED

[Signature]
NOTARY PUBLIC
PATIALA (Pb.) INDIA

29 JAN 2013

2591

10/15/20



 30/1/13

RAJINDER KUMAR
 Stamp Vendor
 Dist. Courts,
 Patna

Exhibit 13



DECLARATION OF MANDEEP SINGH

I, MANDEEP SINGH S/o SHAMSHER SINGH, R/o Bolar Road V.P.O. Sanour Tehsil & District PATIALA, PUNJAB (INDIA) declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Rahgbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know well that Daljit Singh worked as a social worker for Shiromani Akali Dal Amritsar and was a member of the Shirmoni Akali Dal Amritsar political party. This political party is

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OUTSIDE INDIA
EMBASSIES

also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.

3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.
5. On 28 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.
6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the



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OUTSIDE INDIA
EMBASSIES

police and Congress Party were also threatening his family.

7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.



I do read or speak English very well. My declaration has been declaration is affirm and it is true and correct.

DATED this _____ day of 28 01, 2013

Mandeep Singh

MANDEEP SINGH

The Contents of this Affidavit document have been read over to the deponent He/She has accepted it true & correct



Deponent has read the contents of this document and has accepted it true & correct

Mohini

ATTESTED
[Signature]
NOTARY PUBLIC
PATIALA (Pb.) INDIA

29 JAN 2013

68
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2595

20852

RAJANSHY KUMAR
Stamp Vendor
Distt. Courts.
Palani

Handwritten signature

29/3/62


 ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 भारतीय निर्वाचन आयोग
ELECTION COMMISSION OF INDIA
IDENTITY CARD
 UKH0418400



ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਮਨਦੀਪ ਸਿੰਘ
 ELECTOR'S NAME : MANDEEP SINGH
 ਪਿਤਾ ਦਾ ਨਾਂ : ਸ਼ਮਸ਼ੇਰ ਸਿੰਘ
 FATHER'S NAME : SHAMSHER SINGH
 ਲਿੰਗ/SEX : ਮਰਦ/MALE
 ਜਨਮ ਮਿਤੀ/DATE OF BIRTH : 16/07/1974

UKH0418400

ਸੰਪਾਦਕ ਨੰ 3,
 ਸੰਪਾਦਕ ਨੰ 3,
 ਸੰਪਾਦਕ ਨੰ 3,
 ADDRESS - HNO 3,
 SAMAUR WARD NO 3,
 SANKAR,
 TIH-PATALA, DIST-PATALA

Date: 13-9-2011
 114-Sankar - Constituency
 Facsimile Signature of the Electoral
 Registration Officer for
 114-Sankar - Constituency

ਚੋਣਕਾਰ ਨੂੰ, ਜੇਕਰ ਉਹ ਆਪਣੀ ਵੋਟ ਦਾ ਨਾਂ ਬਦਲਣ
 ਜਾਂ ਠਿਕਾਣੇ ਨੂੰ ਬਦਲਣ ਦੀ ਸੂਚਨਾ ਦੇਣਾ ਚਾਹੁੰਦਾ ਹੈ ਤਾਂ
 ਉਹ ਆਪਣੀ ਵੋਟ ਦਾ ਨਾਂ ਅਤੇ ਠਿਕਾਣੇ ਦਾ ਨਾਂ ਬਦਲਣ ਦੀ ਸੂਚਨਾ
 ਦੇਣ ਵਾਲੇ ਫਾਰਮ ਵਿੱਚ ਆਪਣੀ ਵੋਟ ਦਾ ਨਾਂ ਅਤੇ ਠਿਕਾਣੇ ਦਾ ਨਾਂ
 ਦੱਸਣਾ ਚਾਹੀਦਾ ਹੈ।
 In case of change in address, mention this card
 number in the relevant form for including your name
 in the list of the changed address and to obtain the
 card with the same number.

Mandeep Singh

70
12

Exhibit 14



DECLARATION OF MOHINDER SINGH AND
MANJIT KAUR

We, MOHINDER SINGH, a/k/a SR. BALWANT SINGH, and MANJIT KAUR, wife of SR. MOHINDER SINGH R/o Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA), declare that the following is true and correct:

1. We are over the age of 18 years, are competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. Daljit Singh is our son; he was born 18th April 1981 in Patiala, Punjab, India.
3. While living in India, Daljit worked as a supervisor of a retail store called Aditya Birla in Patiala Punjab, India.
4. Daljit also worked as a social worker, and was a member of Shiromani Akali Dal Amritsar, also known as Maan Dal. As a member of this political party, he also worked for the *Kissan Union* in Punjab. As a part of his job as a social worker for the Shiromani Akali Dal Amritsar Political Party, he worked with women in assisting them with sewing machine instruction to provide women with a resource for employment, and assisted them in sewing machines repair as needed.
5. The Sarsewala group did not like Daljit's being a member of Shrimoni Akali Dal Amritsar and his work in helping women. On 28 January 2010, when he was returning from visiting his wife's parents, he was stopped by a group of men, approximately five of them. They started beating Daljit and told him he must stop his social work with women and give up

VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

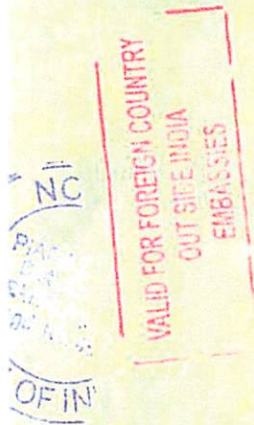


his membership with the Shrimoni Akali Dal Amritsar Party. While they were beating Daljit, some people from the village came, saw Daljit being beaten. The men beating Daljit ran away; the people from the village brought Daljit to our home. He was unconscious, so we took him to the hospital right away for treatment.



6. On 25 February 2010, approximately four men came to our house and asked for Daljit; they threatened us if we did not tell them where Daljit was and demanded Daljit leave his social service work and the Shirmoni Akali Dal Amritsar Political Party.

7. On 17 March 2010, Daljit was returning from work; it was nighttime, approximately 11:00 p.m. to 11.30 p.m. A man dressed as a police officer, stopped Daljit. Suddenly, four or five other men came from out of the field and started beating Daljit. They told Daljit that he did not stop his social work or his political party activities, so he would suffer consequences. They broke his left hand, his middle finger; they cut a deep wound in his arm. A farmer Raghbir Singh heard Daljit's screaming, asked who was there, which scared the men away and they left Daljit in the field. The farmer took Daljit Singh to the hospital.



8. We then tried to file a complaint with the police, but they turned us away and would not allow us assistance in protecting our son. Because we could not protect our son, we sent him to live with our daughter in another city. We asked our daughter and son-in-law to send Daljit to New Delhi and help him in obtaining a visa to leave India, as he was no longer safe in India, and our family was also being threatened.

92
74

29 JAN 2013

ATTESTED
NOTARY PUBLIC
PATIALA (P.B.) INDIA

Print Name

LALIT SINGH

श्रेष्ठ न्यायपालिका
जसोप
जसोप

DATED this _____ day of 28 - 01, 2013

I, Lalit Singh, am fluent in both Punjabi and English. I have translated the above to Mohinder Singh and Manjit Kaur, who state the above declaration is true and accurate to the best of their knowledge.

GOVT. OF INDIA

MANJIT KAUR

Manjit Kaur

MOHINDER SINGH

Mohinder Singh

The Contents of this Affidavit document have been read over to the deponent Here/She has accepted it true & Correct

DATED this _____ day of _____, 2013.

9. After Daljit left our home and village, the Sarsewala political workers and police came looking for Daljit, they were against Daljit's social work because they are against the Sikh religion and want to deny the members of the Sikh faith their voting rights and other access to political and community benefits.
10. We miss our son; he is our only son. We want him to be safe and not suffer anymore.

GOVT. OF INDIA
NOTARY
PATIALA (P.B.) INDIA
29 JAN 2013

We do not read or speak English. Our declaration has been translated from English to Punjabi for us.

VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

2599

10/10/02

[Handwritten signature]

AKHIL KUMAR
Stamp Vendor
Distt. Courts,
Batala

37/1

29/13/02



ELECTION COMMISSION OF INDIA
IDENTITY CARD

ਤਾਰਤ ਚੋਟ ਕਮਿਸ਼ਨ

ਸਨਾਖਤੀ ਕਾਰਤ JTW2564977



ਚੋਟਕਾਰ ਦਾ ਨਾਂ : ਮਨਜੀਤ ਕੌਰ
Elector's Name : MANJIT KAUR
ਪਤੀ ਦਾ ਨਾਂ : ਮਹਿੰਦਰ ਸਿੰਘ
Husband's Name : MAHINDER SINGH
ਲਿੰਗ / Sex : ਇਸਤਰੀ/FEMALE
1.1.2006 ਨੂੰ ਉਮਰ : 47 ਸਾਲ
Age as on 1.1.2006 : 47 Years

JTW2584977

ਪਤਾ : ਮ.ਨੰ. 229 ਸਨੌਰ ਵਾਰਡ ਨੰ.5
ਨਗਰ ਕੌਸਲ ਸਨੌਰ
ਤਹਿਸੀਲ ਪਟਿਆਲਾ, ਜਿਲ੍ਹਾ ਪਟਿਆਲਾ

Address : HNO. 229 SANOUR WARD NO. 5
NAGAR KAUSHAL SANOUR
TEH.PATIALA, DISTT.PATIALA

073 - ਤਕਸ਼ੀ ਚੋਟ ਪੇਂਡਰ ਦੇ
ਚੋਟਕਾਰ ਰਜਿਸਟਰੇਸ਼ਨ ਅਫਸਰ ਦੇ
ਹਸਤਾਖਰ ਦਾ ਇੰਨ ਚਿੱਨ ਉਤਾਰਾ

Facsimile Signature of the
Electoral Registration Officer
for 073 - DAKALA Constituency

ਥਾਂ : ਪਟਿਆਲਾ ਮਿਤੀ : 12-12-2006
Place : PATIALA Date : 12-12-2006

ਇਸ ਕਾਰਤ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਕੀਮਾਂ ਲਈ
ਸਨਾਖਤੀ ਕਾਰਤ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।
This Card may be used as an Identity Card under
different Government Schemes.

ਮਨਜੀਤ ਕੌਰ

76

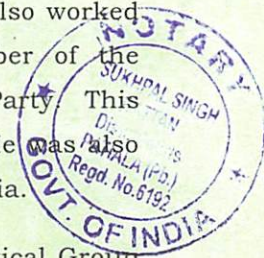


VALID FOR FOREIGN COUNTRY
OUTSIDE INDIA & EMBASSIES

DECLARATION OF MANJIT KAUR

I, Manjit Kaur W/o Sh. Mohinder Singh R/o H. No. 229, Fatehpur Road, Village & P.O. Sanour, Tehsil and District Patiala, Punjab, INDIA, declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own person knowledge and recollection.
2. My one and only son is Daljit Singh, he has three children. His wife and his children live in H. No. 229, Fatehpur Road, Village & P.O. Sanour, Tehsil and District Patiala, Punjab, INDIA with us.
3. When my son lived in India, he worked as a Retail Supervisor for a store in Patiala, India. He also worked as a social worker for and was a member of the Shiromani Akali Dal, Amritsar Political Party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
4. That Congress Party and the Sarsewala Political Group did not like Daljit's social work. So they attack two times on him, as a result one time he was also injured very badly. The reason is that they want that he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party.
5. On 25th February 2010, some men came to our house, asking for Daljit. They threatened me and Daljit's family members if we did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and

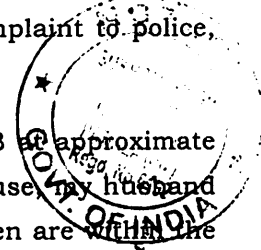


political party activity, he would suffer bad consequences.

6. Daljit's father and I tried to file a complaint with the police, but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work.

7. On dated 19th February 2013 in the midnight when we are sleeping inside our house, Daljit's wife wake up when we listen some noises from outside, she woke me and my husband, when my husband saw through the window there are some people with weapons like swords, wooden sticks etc. are trying to open the entrance gate of our house, but the gate was locked from inside, so they started attacking with swords on gate and also saying that we kill you today. When our children and we listen this, we start screaming, after that they left, but while going they said that we need Daljit, otherwise we kill your family, then he feel pain and then he come back. We try to complaint to police, but they didn't listen to us.

8. Second time on dated 7th August 2013 at approximate 2:00 am we are sleeping inside our house, my husband listen some noises when he saw 2-3 men are within the boundary wall of our house, they have sharp weapons in their hand. When my husband saw this he scared and he woke us and we start shouting that save us, then my husband pick up the pistol and fire 3-4 bullets in air. When they listen the noise of bullets then they run away. In the morning when my husband gone to police station to complaint this incident, which was happened with us, they didn't listen us and say if they come again kill them.



- 9. After all this my husband decided to put thorny wire on the boundary walls of our entire house. But we can't sleep well in nights because we are in fear that they harm to Daljit's children and my whole family.
- 10. I miss my one and only son and his children also miss him, but we cannot want him come back to our village; I am afraid that they will kill my children and us.
- 11. I do not read or speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.

Dated this 23rd day of August 2013.

ਮਾਨਜਿਤ ਕੌਰ

MANJIT KAUR

I, SUKHPAL SINGH, Advocate-cum-Notary Public, District Courts, Patiala, Punjab, INDIA, am fluent in both Punjabi & English. I have translated the above to Manjit Kaur, who states the above declaration is true and accurate to the best of her knowledge.

Dated this 23rd day of August 2013.



The contents of this Affidavit
 recited have been read over to
 the deponent He/She has accepted
 it true & correct. Notary has no
 concern with the contents of the
 documents in any way only
 Signature/Thumb has been Attested

ATTESTED

Notary Public
Patiala (Pb.) India

23 AUG 2013

80

Exhibit 15



DECLARATION OF MOHINDER SINGH AND
MANJIT KAUR

We, MOHINDER SINGH, a/k/a SR. BALWANT SINGH, and
MANJIT KAUR, wife of SR. MOHINDER SINGH, R/o
Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala,
Punjab (INDIA), declare that the following is true and
correct:

1. We are over the age of 18 years, are competent to
testify in a court of law, and voluntarily provide this
statement from our own personal knowledge and
recollection.
2. Daljit Singh is our son; he was born 18th April 1981
in Patiala, Punjab, India.
3. While living in India, Daljit worked as a supervisor
of a retail store called Aditya Birla in Patiala
Punjab, India.
4. Daljit also worked as a social worker, and was a
member of Shiromani Akali Dal Amritsar, also
known as Maan Dal. As a member of this political
party, he also worked for the *Kissan Union* in
Punjab. As a part of his job as a social worker for
the Shiromani Akali Dal Amritsar Political Party, he
worked with women in assisting them with sewing
machine instruction to provide women with a
resource for employment, and assisted them in
sewing machines repair as needed.
5. The Sarsewala group did not like Daljit's being a
member of Shrimoni Akali Dal Amritsar and his work
in helping women. On 28 January 2010, when he
was returning from visiting his wife's parents, he
was stopped by a group of men, approximately five of

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OUT-SIDE INDIA
EMBASSIES



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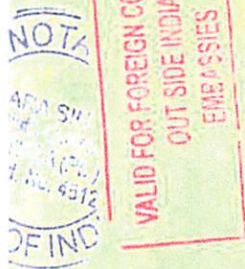


them. They started beating Daljit and told him he must stop his social work with women and give up his membership with the Shrimoni Akali Dal Amritsar Party. While they were beating Daljit, some people from the village came, saw Daljit being beaten. The men beating Daljit ran away; the people from the village brought Daljit to our home. He was unconscious, so we took him to the hospital right away for treatment.

6. On 25 February 2010, approximately four men came to our house and asked for Daljit; they threatened us if we did not tell them where Daljit was and demanded Daljit leave his social service work and the Shirmoni Akali Dal Amritsar Political Party.

7. On 17 March 2010, Daljit was returning from work; it was nighttime, approximately 11:00 p.m. to 11.30 p.m. A man dressed as a police officer, stopped Daljit. Suddenly, four or five other men came from out of the field and started beating Daljit. They told Daljit that he did not stop his social work or his political party activities, so he would suffer consequences. They broke his left hand, his middle finger; they cut a deep wound in his arm. A farmer Raghbir Singh heard Daljit's screaming, asked who was there, which scared the men away and they left Daljit in the field. The farmer took Daljit Singh to the hospital.

8. We then tried to file a compliant with the police, but they turned us away and would not allow us assistance in protecting our son. Because we could not protect our son, we sent him to live with our daughter in another city. We asked our daughter and son-in-law to send Daljit to New Delhi and help him in obtaining a visa to leave India, as he was no



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OUT SIDE INDIA
EMBASSIES

longer safe in India, and our family was also being threatened.

9. After Daljit left our home and village, the Sarsewala political workers and police came looking for Daljit, again. They were against Daljit's social work because they are against the Sikh religion and want to deny the members of the Sikh faith their voting rights and other access to political and community benefits.



10. We miss our son; he is our only son. We want him to be safe and not suffer anymore.

11. We do not read or speak English. Our declaration has been translated from English to Punjabi for us.

DATED this _____ day of _____, 2013.

The Contents of this Affidavit/
document have been read over to
the deponent, He/She has accepted
it true & Correct

Mohinder Singh
MOHINDER SINGH

ਮਾਨਜਿਤ ਕੌਰ
MANJIT KAUR



I, Lalit goyal, am fluent in both Punjabi and English. I have translated the above to Mohinder Singh and Manjit Kaur, who state the above declaration is true and accurate to the best of their knowledge.

DATED this _____ day of 22-01, 2013

I certify the document/Person
is whom I know personally.

Mohinder Singh

Print Name

ATTESTED

[Signature]
NOTARY PUBLIC
PUNJAB (INDIA)
23-01-2013

84
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2603 $\frac{10}{2}$ 18/10

[Handwritten signature]

KANTOR KUKAS
Jalan Sendor
Dist. Gurah
Pulau

18/10
29/13/2


 भारत चेत लीकित
 भारतीय लोकतन्त्र
 ELECTION COMMISSION OF INDIA
 IDENTITY CARD
 JTW2584951



ਚੋਣਕਾਰ ਦਾ ਨਾਮ : ਮਹਿੰਦਰ ਸਿੰਘ
 ELECTOR'S NAME : MAHINDER SINGH
 ਪਿਤਾ ਦਾ ਨਾਮ : ਮਹਿੰਦਰ ਸਿੰਘ
 FATHER'S NAME : BALWANT SINGH
 ਲਿੰਗ/SEX : ਮਰਦ/MALE
 ਪੈਦਾ ਹੋਣ ਦਾ ਮਿਤੀ/DATE OF BIRTH : 01/04/1957

JTW2584951

ਠਿਕਾਣਾ - H-225
 ਸੰਗਰੂਰ ਜ਼ਿਲ੍ਹਾ
 ਸੰਗਰੂਰ
 501-400007, ਸੰਗਰੂਰ
 ADDRESS - H-225
 Sangrur Ward No. 7
 Sangrur,
 TEH-PATIALA, DIST-PATIALA

Date: 25-12-2012
 114-ਸੰਗਰੂਰ - ਚੋਣਕਾਰਾਂ ਦੇ ਨਾਮਾਂ ਦੀ ਸੂਚੀ ਵਿੱਚ ਸ਼ਾਮਲ ਕੀਤਾ ਗਿਆ
 ਫਾਕਸਿਮਿਲ ਸਿਗਨੇਚਰ of the Electoral
 Registration Officer for
 114-Sangrur - Constituency

ਜੇ ਠਿਕਾਣਾ ਬਦਲਿਆ ਜਾਂਦਾ ਹੈ ਤਾਂ ਇਸ ਕਾਰਡ ਨੂੰ
 ਵਰਤੋਂ ਵਿੱਚ ਰੱਖਣ ਦੀ ਬਜਾਏ ਇਸ ਕਾਰਡ ਨੂੰ ਠੀਕ ਠੀਕ
 ਮਿਤੀ ਅਤੇ ਠਿਕਾਣੇ ਨਾਲ ਮਿਲਾ ਕੇ ਫਿਰੋਲ ਕਰੋ।
 In case of change in address, mention this card
 number in the relevant form for including your name
 in the roll at the changed address and to obtain the
 card with the same number. 67 / 531

Handwritten signature in blue ink

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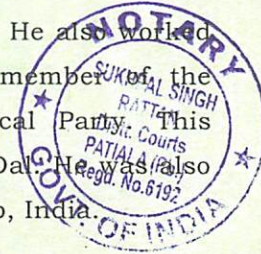


VALID FOR FOREIGN COUNTRY
OUTSIDE INDIA & EMBASSIES

DECLARATION OF MOHINDER SINGH

I, Mohinder Singh S/o Sh. Balwant Singh R/o H. No. 229, Fatehpur Road, Village & P.O. Sanour, Tehsil and District Patiala, Punjab, INDIA, declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own person knowledge and recollection.
2. My one and only son is Daljit Singh, he has three children. His wife and his children live in H. No. 229, Fatehpur Road, Village & P.O. Sanour, Tehsil and District Patiala, Punjab, INDIA with us.
3. When my son lived in India, he worked as a Retail Supervisor for a store in Patiala, India. He also worked as a social worker for and was a member of the Shiromani Akali Dal, Amritsar Political Party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
4. That Congress Party and the Sarsewala Political Group did not like Daljit's social work. So they attack two times on him, as a result one time he was also injured very badly. The reason is that they want that he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party.
5. On 25th February 2010, some men came to our house, asking for Daljit. They threatened me and my family members if we did not tell them where Daljit was. They told me that he saved his son's life before, but if Daljit



2022/23

Handwritten signatures and scribbles, including a large signature that appears to be 'Rajinder Kumar'.

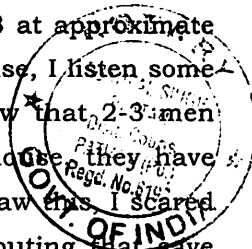
RAJINDER KUMAR
5.11.2022



Faint, mostly illegible printed text, possibly a letter or official document, with some words like 'The following is the list of...' and 'The reason for...' visible.

did not stop his social work and political party activity, he would suffer bad consequences.

6. I tried to file a complaint with the police, but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work.
7. On dated 19th February 2013 in the midnight when we are sleeping inside our house, Daljit's wife wake up when we listen some noises from outside, she woke me, when I saw through the window there are some people with weapons like swords, wooden sticks etc. are trying to open the entrance gate of our house, but the gate was locked from inside, so they started attacking with swords on gate and also saying that we kill you today. When our children and we listen this, we start screaming, after that they left, but while going they said that we need Daljit, otherwise we kill your family, then he feel pain and then he come back. We try to complaint to police, but they didn't listen to us.
8. Second time on dated 7th August 2013 at approximate 2:00 am we are sleeping inside our house, I listen some noises when I saw through the window that 2-3 men are within the boundary wall of our house, they have sharp weapons in their hand. When I saw this, I scared and woke my family and we start shouting that save us, then I pick up my pistol and fire 3-4 bullets in air. When they listen the noise of bullets then they run away. In the morning when I gone to police station to complaint this incident, which was happened with us, they didn't listen us and say if they come again kill them.
9. After all this I decided to put thorny wire on the boundary walls of our entire house. But we can't sleep



well in nights because we are in fear that they harm to Daljit's children and my whole family.

10. I miss my one and only son and his children also miss him, but we cannot wanna him come back to our village; I am afraid that they will kill my children and us.

11. I read English, but I can't speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.

Dated this 23rd day of August 2013.

Mohinder Singh
MOHINDER SINGH

I, *Sukhpal Singh*, Advocate-cum-Notary Public, District Courts, Patiala, Punjab, INDIA, am fluent in both Punjabi & English. I have translated the above to Mohinder Singh, who state the above declaration is true and accurate to the best of her knowledge.

Dated this 23rd day of August 2013.



The contents of this Affidavit & documents have been read over to the deponent and she has accepted it true & correct. Notary has no concern with the contents of the documents in any way only Signature/Thumb has been Attested

ATTESTED

S
Notary Public
Patiala (Pb), India

23 AUG 2013

Exhibit 16



VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

DECLARATION OF NAVDEEP KAUR

I, Navdeep Kaur W/o Sh. Daljit Singh R/o Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA), declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. My husband is Daljit Singh. We married on 21.11.1999. We have three children together. I and our children live in Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA).
3. When my husband lived in India, he worked as a Retail Supervisor for a Store in Patiala, India. He also worked as a social worker for and was a member of the Shiromani Akali Dal Amritsar political party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
4. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
5. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming



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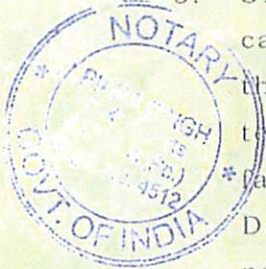
VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

home from visiting my parents, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his parents' home. He was unconscious, so we took him to the hospital to the doctor.

6. On 25 February 2010, approximately 3-4 men came to our house, asking for Daljit. They threatened me and Daljit's parents if we did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

7. On 17 March 2010, my husband was coming home from his job; it was approximately 11:00 p.m. A man approached him; he was dressed like a policeman. Suddenly, five other men came from out of a field and started beating Daljit. Daljit told me they beat him with wooden sticks and swords, and told him he did not obey their commands to stop his social work and political activity. A farmer Raghbir Singh heard Daljit's screams, he asked who was there because it was dark, and the men stopped beating Daljit and ran. The farmer Raghbir Singh took my husband to the hospital. He had a broken finger and deep wound to his arm.

8. Daljit's parents and I tried to file a compliant with the police, but they told us to go away and would not hear our compliant or provide Daljit safety or



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OUT SIDE INDIA
EMBASSIES

us. They told us Daljit needed to stop his social work.

9. My father-in-law and mother-in-law decided to send Daljit to his sister's home where he would be safe for a little while. They told his sister to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening our family.

10. I miss my husband and our children miss him, but if he come back to our village; I am afraid they will kill him.



I do not read or speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.

DATED this 26 day of 01, 2013.



The Contents of this Affidavit document have been read over to the deponent. She has affirmed it true & correct.

Navdeep Kaur

NAVDEEP KAUR

I, Lalit goyal, am fluent in both Punjabi and English. I have translated the above to Navdeep Kaur, who state the above declaration is true and accurate to the best of her knowledge.

DATED this _____ day of 26-01, 2013

ਦੇਖਣ ਨੂੰ ਮਿਲਾ ਕੇ ਪੁਸ਼ਟਿਤ ਕੀਤਾ ਜਾਂਦਾ ਹੈ ਕਿ ਉਹ ਸ਼ਖ਼ਸੀ ਤੌਰ 'ਤੇ ਸਹਿਮਤ ਹੈ।

Mohini

Print Name

ATTESTED

NOTARY PUBLIC
PATIALA (PUNJAB)

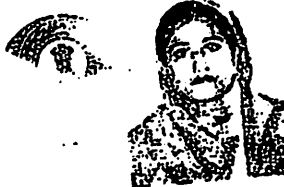
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2601 10/25/22
2924 10/23/22
2024/10/23/22

RAINIER KITCHEN
RAINIER CLUB
Stamp Vendor
Mail Courts.

10/13/22


ELECTION COMMISSION OF INDIA
IDENTITY CARD
 ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 ਭਾਰਤੀ ਚਾਰਟ **JTW2595073**



ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਨਵਦੀਪ ਕੌਰ
 Elector's Name : NAVDEEP KAUR
 ਪਤੀ ਦਾ ਨਾਂ : ਦਲਜੀਤ ਸਿੰਘ
 Husband's Name : DALJIT SINGH
 ਲਿੰਗ / Sex : ਚਿਸਤਰੀ/FEMALE
 1.1.2008 ਤੋਂ ਉਮਰ : 26 ਸਾਲ
 Age as on 1.1.2008 : 26 Years

ਪਤਾ : ਮ.ਨੰ. 229 ਸਮੌਰ ਚਾਰਟ ਨੰ.5
 ਨਗਰ ਕੌਸ਼ਲ ਸਮੌਰ
 ਤਹਿਸੀਲ ਪਟਿਆਲਾ, ਜ਼ਿਲ੍ਹਾ ਪਟਿਆਲਾ **JTW2595073**

Address : H.NO. 229 SANAUR WARD NO. 5
 NAGAR KAUSHAL SANAUR
 TEH.PATIALA, DISTT.PATIALA

073 - ਭਾਰਤ ਚੋਣ ਖੇਤਰ ਦੇ
 ਚੋਣਕਾਰ ਚਿਸਤਰੀ ਅਧਿਕਾਰ ਦੇ
 ਚਸਤਾਖਰ ਦਾ ਇੰਨ ਖਿੱਚ ਉਤਾਰਾ

Facsimile Signature of the
 Electoral Registration Officer
 for 073 - DAKALA Constituency

ਚੋਣ : ਪਟਿਆਲਾ ਮਿਤੀ : 12-12-2008
 Place : PATIALA Date : 12-12-2008

ਇਸ ਚਾਰਟ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਹੂਲਤਾਂ ਲਈ
 ਭਾਰਤੀ ਚਾਰਟ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।
 This Card may be used as an Identity Card under
 different Government Schemes.

Navdeep Kaur



VALID FOR FOREIGN COUNTRY
OUTSIDE INDIA & EMBASSIES

DECLARATION OF NAVDEEP KAUR

I, Navdeep Kaur W/o Sh. Daljit Singh R/o H. No. 229, Fatehpur Road, Village & P.O. Sanour, Tehsil and District Patiala, Punjab, INDIA, declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own person knowledge and recollection.
2. My husband is Daljit Singh. We married on 21.11.1999. We have three children together. I and our children live in H. No. 229, Fatehpur Road, Village & P.O. Sanour, Tehsil and District Patiala, Punjab, INDIA.
3. When my husband lived in India, he worked as a Retail Supervisor for a store in Patiala, India. He also worked as a social worker for and was a member of the Shiromani Akali Dal, Amritsar Political Party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
4. That Congress Party and the Sarsewala Political Group did not like Daljit's social work. So they attack two times on him, as a result one time he was also injured very badly. The reason is that they want that he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party.
5. On 25th February 2010, some men came to our house, asking for Daljit. They threatened me and Daljit's parents if we did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

6. Daljit's parents and I tried to file a complaint with the police, but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work.
7. On dated 19th February 2013 in the midnight when we are sleeping inside our house, we wake up when we listen some noises from outside. I woke my father-in-law, when he saw through the window there are some people with weapons like swords, wooden sticks etc. are trying to open the entrance gate of our house, but the gate was locked from inside, so they started attacking with swords on gate and also saying that we kill you today. When our children and we listen this, we start screaming, after that they left, but while going they said that we need Daljit, otherwise we kill your family, then he feel pain and then he come back. We try to complaint to police, but they didn't listen to us.
8. Second time on dated 7th August 2013 at approximate 2:00 am we are sleeping inside our house, my father-in-law listen some noises when he saw 2-3 men are within the boundary wall of our house, they have sharp weapons in their hand. When my father-in-law saw this he scared and he woke us and we start shouting that save us, then my father-in-law pick up the pistol and fire 3-4 bullets in air. When they listen the noise of bullets then they run away. In the morning when my father-in-law gone to police station to complaint this incident, which was happened with us, they didn't listen us and say if they come again kill them.
9. After all this my father-in-law decided to put thorny wire on the boundary walls of our entire house. But we can't sleep well in nights because we are in fear that they harm to me and my children.

- 10. I miss my husband and our children miss him, but he cannot come back to our village; I am afraid that they will kill my children and us.
- 11. I do not read or speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.

Dated this 23rd day of August 2013.

Navdeep Kaur
 NAVDEEP KAUR

I, SUKHPAL SINGH, Advocate-cum-Notary Public, District Courts, Patiala, Punjab, INDIA, am fluent in both Punjabi & English. I have translated the above to Navdeep Kaur, who state the above declaration is true and accurate to the best of her knowledge.

Dated this 23rd day of August 2013.



Both sides of this document have been read over to the deponent He/She has accepted it true & correct. Notary has no concern with the contents of the documents in any way only Signature/Thumb has been Attested

ATTESTED

[Signature]
 Notary Public
 Patiala (Pb.) India

23 AUG 2013

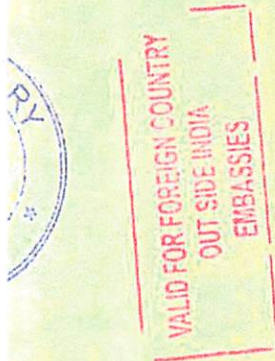
Exhibit 17



DECLARATION OF PREM SINGH

I, PREM SINGH S/o JANG SINGH, R/o Village Kartarpur P.O. Jogipur Tehsil & District PATIALA, PUNJAB (INDIA) declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Raghbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know well Daljit Singh worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party. This political party is also known as Maan Dal.



He was also a member of the Kissan Union in Punjab, India.

3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.
5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.
6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the



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OUT SIDE INDIA
EMBASSIES

police and Congress Party were also threatening his family.

- 7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.



I do not read or speak English. My declaration has been translated to me in Punjabi, and affirm it is true and correct.

DATED this _____ day of 26 01 2013

The Contents of this Affidavit/
document have been read over to
the deponent He/She has accepted
it true & Correct

Prem Singh

PREM SINGH



I, Lalit Goyal, am fluent in both Punjabi and English. I have translated the above to Prem Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this _____ day of 26 01 - 2013

Print Name

Identify the deponent personally
I want to know personally

Mohina

ATTESTED
NOTARY PUBLIC
PATIALA (Pb.) INDIA

29 JAN 2013

2594

10/2 [Signature]

SM

[Signature]

MANUEL KUMAR
Stamp Vendor
Durai Sours,
Chennai

1/3
29/13

[Signature]

105
[Signature]



ELECTION COMMISSION OF INDIA
IDENTITY CARD

ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
ਸਨਾਖਤੀ ਕਾਰਡ

PB/08/072/090087

D U P L I C A T E



Elector's Name : PREM SINGH
ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਪ੍ਰੇਮ ਸਿੰਘ
Father's Name : JANG SINGH
ਪਿਤਾ ਦਾ ਨਾਂ : ਜੰਗ ਸਿੰਘ
Sex / ਲਿੰਗ : MALE / ਪੁਰਸ਼
Age as on 1.1.2006 : 35 Years
1.1.2006 ਨੂੰ ਉਮਰ : 35 ਸਾਲ

Address : HHO, 38
VILL. KARTARPUR
TEH. PATIALA, DISTT. PATIALA

PB/08/072/090087

ਪਤਾ : ਮ.ਨੰ. 38
ਪਿੰਡ ਕਰਤਾਰਪੁਰ
ਤਹਿਸੀਲ ਪਟਿਆਲਾ, ਜਿਲ੍ਹਾ ਪਟਿਆਲਾ

Facsimile Signature of the
Electoral Registration Officer
for 072 - GHANAUR Constituency

072 - ਘਨੌਰ ਚੋਣ ਪੇਂਡੂ ਦੇ
ਚੋਣਕਾਰ ਰਜਿਸਟਰੇਸ਼ਨ ਅਫਸਰ ਦੇ
ਹਸਤਾਖਰ ਦਾ ਇੰਨ ਬਿੰਨ ਉਤਾਰਾ

Place : PATIALA
ਜਾਂ : ਪਟਿਆਲਾ

Date : 07-11-2006
ਮਿਤੀ : 07-11-2006

This Card may be used as an Identity Card under
different Government Schemes.

ਇਸ ਕਾਰਡ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਕੀਮਾਂ ਲਈ
ਸਨਾਖਤੀ ਕਾਰਡ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।

10

1051

Prem Singh

106
87

Exhibit 18



DECLARATION OF RAGHBIR SINGH

I, RAGHBIR SINGH S/o MAAN SINGH, R/o Mohalla Kansian Wala V.P.O. SANOUR Tehsil and District Patiala, PUNJAB (INDIA) declare that the following is true and correct:

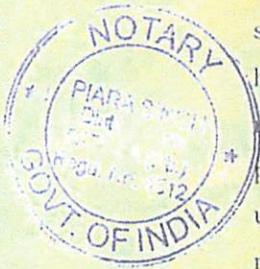
1. I am over the age of 18 years, am competent to testify in a court of law and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 17 March 2010, it was approximately 11:00 p.m. I was working in my fields, suddenly I heard screams of somebody and I asked who was there because it was dark, when I reach near to there I saw some peoples beating a guy with wooden sticks and swords, when they saw me the men stopped beating Daljit and ran. Then I took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. Before this incident I don't know Daljit Singh but after that I get information about him that he also worked as a social worker for and was a member of the Shiromani Akali Dal Amritsar political party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
3. As a social worker, he helped women in India purchase sewing machines and learn how to sew,

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so they would have employment. He also helped them fix their sewing machines when they would break.

4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from visiting his parents-in-law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.



5. On 25 February 2010, approximately 3-4 men came to our house, asking for Daljit. They threatened Daljit's parents if we did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences. I got all this information about these happens from Daljit's parents.



6. So after that Daljit's father and mother decided to send Daljit to his sister's home where he would be safe for a little while. They told her to help Daljit to go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening his family.
7. He is only brother of two sister's and a son of his parents, but he cannot come back to his village to

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OUT SIDE INDIA
EMBASSIES

live with his children's, I am afraid they will kill him.

8. I do not read or speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.



DATED this 29 day of January, 2013.

Ragbir Singh
RAGHBIR SINGH

I, *Lalit Goyal*, am fluent in both Punjabi and English. I have translated the above to Ragbir Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this 26 day of 01, 2013



The Contents of this Affidavit/
document have been read over to
the deponent He/She has accepted
it true & Correct

LALIT GOYAL

Print Name

ਮਦਦੀਆਂ ਨੇ ਦਸਤਾਵੇਜ਼ ਨੂੰ ਪੜ੍ਹਿਆ ਅਤੇ ਸਹੀ ਕੀਤਾ।

Madina

ATTESTED

NOTARY PUBLIC
PATIALA (Pb.) INDIA

26 JAN 2013

ELECTION COMMISSION OF INDIA
IDENTITY CARD

ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
ਸਨਾਖਤੀ ਕਾਰਡ

JTW1869676



Elector's Name : RAGHVIR SINGH
ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਰਾਘਵੀਰ ਸਿੰਘ
Father's Name : MAAN SINGH
ਪਿਤਾ ਦਾ ਨਾਂ : ਮਾਨ ਸਿੰਘ
Sex ਜਿਲੰਗ : MALE ਮਰਦ
Age as on 1.1.2006 55 Years
1.1.2006 ਨੂੰ ਉਮਰ : 55 ਸਾਲ

JTW1869676

Address: HNO. 88 SANOUR WARD NO. 8
NAGAR KAUSHAL SANOUR
TEH. PATIALA, DISTT. PATIALA

ਪਤਾ : ਮ.ਨੰ. 88 ਸਨੌਰ ਵਾਰਡ ਨੰ. 8
ਨਗਰ ਕੌਸ਼ਲ ਸਨੌਰ
ਤਹਿਸੀਲ ਪਟਿਆਲਾ, ਜਿਲ੍ਹਾ ਪਟਿਆਲਾ

Facsimile Signature of the
Electoral Registration Officer
for 073 - DAKALA Constituency

073 - ਡਕਾਲਾ ਚੋਣ ਖੇਤਰ ਦੇ
ਚੋਣਕਾਰ ਰਜਿਸਟਰੇਸ਼ਨ ਅਫਸਰ ਦੇ
ਹਸਤਾਖਰ ਦਾ ਫਿੰਨ ਬਿੰਨ ਉਤਾਰਾ

Place: PATIALA
ਥਾਂ : ਪਟਿਆਲਾ

Date : 16-11-2006
ਮਿਤੀ : 16-11-2006

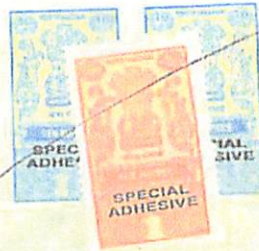
This Card may be used as an Identity Card under
different Government Schemes.

ਇਸ ਕਾਰਡ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਕੀਮਾਂ ਲਈ
ਸਨਾਖਤੀ ਕਾਰਡ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।

Handwritten signature

112
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Exhibit 19



KAUR

DECLARATION OF RANJIT SINGH

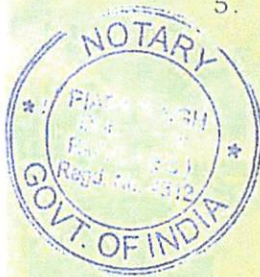
KAUR

1. RANJIT ~~SINGH~~ sister of DALJIT SINGH D/o MOHINDER SINGH, R/o Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA), declare that the following is true and correct:

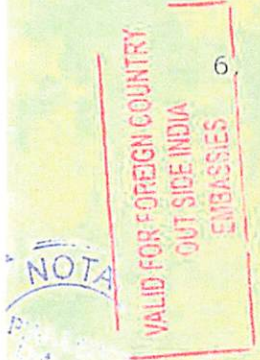
1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. My Brother is Daljit Singh. He married with NAVDEEP KAUR. He has three children together. Their children live in Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA). When my Brother lived in India, he worked as a retail supervisor for a store in Patiala, India. He also worked as a social worker for and was a member of Shiromani Akali Dal Amritsar political party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop

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EMBASSIES

being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to my parents' home. He was unconscious, so we took him to the hospital to the doctor.



5. On 25 February 2010, approximately 3-4 men came to our house, asking for Daljit. They threatened me and Daljit's parents if we did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.



6. On 17 March 2010, my brother was coming home from his job; it was approximately 11:00 p.m. A man approached him; he was dressed like a policeman. Suddenly, five other men came from out of a field and started beating Daljit. Daljit told me they beat him with wooden sticks and swords, and told him he did not obey their commands to stop his social work and political activity. A farmer heard Daljit's screams, he asked who was there because it was dark, and the men stopped beating Daljit and ran. The farmer took my brother to the hospital. He had a broken finger and deep wound to his arm.

7. Daljit's parents tried to file a complaint with the police, but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work.

8. My father and mother decided to send Daljit to my home where he would be safe for a little while.

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OUT SIDE INDIA
EMBASSIES

They told me to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening our family.

9. I miss my brother too much because he is only brother of us and a son of my parents, but if he come back to his village to live with his children's; I am afraid they will kill him.

10. I do not read or speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.



DATED this _____ day of 29 01, 2013

Ranjit Kaur
RANJIT KAUR



I, Lalit Goyal, am fluent in both Punjabi and English. I have translated the above to Ranjit Kaur, who state the above declaration is true and accurate to the best of her knowledge

The Contents of this Affidavit/ document have been read over to the deponent. He/She has accepted it True & Correct

DATED this _____ day of 29 01, 2013

[Signature]

[Signature]

Print Name

[Signature]
Notary Public
Patiala (Pb.) India

ATTESTED
NOTARY PUBLIC
PATIALA (PB.) INDIA

29 JAN 2013

200 10/15
Handwritten scribbles and signatures

RAJESH KUMAR
Stamp Vendor
Distt. Courts,
Panaji

29/13
Handwritten signature

Exhibit 20



DECLARATION OF RAWEL SINGH

I, RAWEL SINGH S/o BACHNA RAM, R/o Mohalla Ghumara Wala V.P.O. Sanour Tehsil & District PATIALA, PUNJAB (INDIA) declare that the following is true and correct:

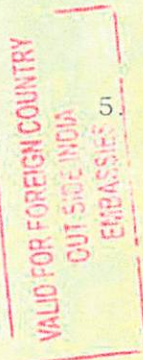
1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Raghbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. Before this incident I don't know Daljit Singh but after that I get information about him that he also worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party. This political party is also known as Maan Dal. He was

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OUT SIDE INDIA
EMBASSIES



also a member of the Kissan Union in Punjab, India.

3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.

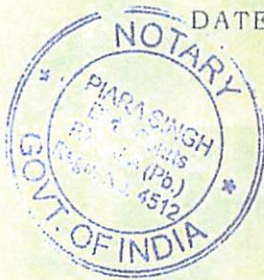


5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.
6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening his family.

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OUTSIDE INDIA
EMBASSIES

- 7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.
- 8. I do not read or speak English. My declaration has been translated to me in Punjabi, and affirm it is true and correct.

DATED this _____ day of 26 01, 2013



The Contents of this document have been read over to the deponent He/She has accepted it true & Correct

Rawel Singh
RAWEL SINGH

I, Lalit Goyal, am fluent in both Punjabi and English. I have translated the above to Rawel Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this _____ day of 26 01 2013



Print Name

Attest in presence of whom

Monika

ATTESTED

NOTARY PUBLIC
PATIALA (Pb.) INDIA

29 JAN 2013

2597 12/15/2
2597
11
29/13/2

MUNOJ K. KUMAR
Stamp Vendor
Distt. Courts,
Palaisa

ELECTION COMMISSION OF INDIA
IDENTITY CARD

ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
ਸਨਾਖਤੀ ਕਾਰਡ

JTW1869528



Elector's Name : RAVEL CHAND
ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਰਵੇਲ ਚੰਦ
Father's Name : BACHNA RAM
ਪਿਤਾ ਦਾ ਨਾਂ : ਬਚਨਾ ਰਾਮ
Sex / ਲਿੰਗ : MALE / ਮਰਦ
Age as on 1.1.2006 35 Years
1.1.2008 ਨੂੰ ਉਮਰ : 35 ਸਾਲ

JTW1869528

Address: H.NO. 77 SANOUR WARD NO. 8
NAGAR KAUSHAL SANOUR
15-PATIALA, DISTT.PATIALA

ਪਤਾ : ਮ.ਨੰ. 77 ਸਨੌਰ ਵਾਰਡ ਨੰ.8
ਨਗਰ ਕੌਸ਼ਲ ਸਨੌਰ
ਤਹਿਸੀਲ ਪਟਿਆਲਾ, ਜਿਲ੍ਹਾ ਪਟਿਆਲਾ

Facsimile Signature of the
Electoral Registration Officer
for 073 - BAKALA Constituency

073 - ਸਨੌਰ ਚੋਣ ਪੱਤਰ ਦੇ
ਚੋਣਕਾਰ ਰਜਿਸਟਰੇਸ਼ਨ ਅਫ਼ਸਰ ਦੇ
ਸਨੌਰ ਵਾਰਡ ਦਾ ਵਿੱਚ ਬਿੰਨ ਉੱਤਰਾ

Place : PATIALA Date : 16-11-2006
ਥਾਂ : ਪਟਿਆਲਾ ਮਿਤੀ : 16-11-2006

This Card may be used as an Identity Card under
different Government Schemes.
ਇਸ ਕਾਰਡ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਕੀਮਾਂ ਲਈ
ਸਨਾਖਤੀ ਕਾਰਡ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।

278

Ravel Svel

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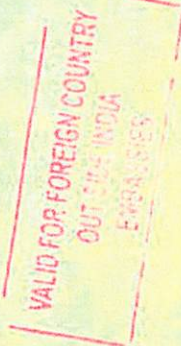
Exhibit 21



DECLARATION OF SANDEEP SINGH

I, SANDEEP SINGH S/o JOGINDER SINGH, R/o Bolar Road V.P.O. Sanour Tehsil & District PATIALA, PUNJAB (INDIA) declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Raghbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know Daljit Singh that he worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.



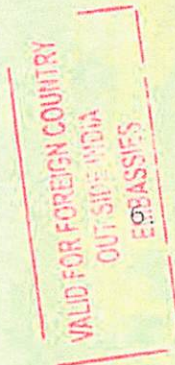
3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.

4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.

5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening his family.

7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.



VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

8. I do not read or speak English. My declaration has been translated to me in Punjabi, and affirm it is true and correct.

DATED this 24 day of 01, 2013



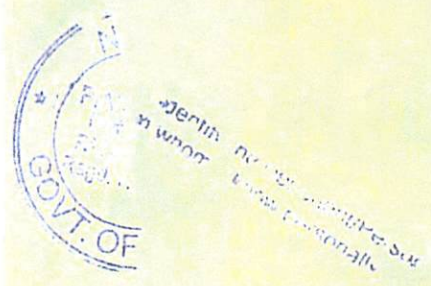
The Contents of this Affidavit/ document have been read over to the deponent He/She has accepted if true & Correct

Sandeep Singh
SANDEEP SINGH

I, Lalit goyal, am fluent in both Punjabi and English. I have translated the above to Sandeep Singh, who state the above declaration is true and accurate to the best of their knowledge.

DATED this _____ day of 22 01 2013

Print Name



Mohinder

ATTESTED
[Signature]
NOTARY PUBLIC
PATIALA (Pb.) INDIA

22/01/2013

127
39

2596
10/10/02
Stamp Vendor
Distt Courts,
Patana



भारत के निर्वाचन आयोग

ELECTION COMMISSION OF INDIA
IDENTITY CARD

UKH0418418



ਉਣਕਾਰ ਫਾ ਨਾਮ : ਸੰਦੀਪ ਸਿੰਘ

ELECTORS NAME : SANDEEP SINGH

ਪਿਤਾ ਫਾ ਨਾਮ : ਜਗਿੰਦਰ ਸਿੰਘ

FATHER'S NAME : JOGINDER SINGH

ਲਿੰਗ/SEX : MALE

ਪਿੰਡ/ਪਿੰਡ DATE OF BIRTH : 31/08/1982

Sandeep Singh

UKH0418418

ਭਾਰਤੀ ਚੋਣ
ਅਥਾਰਟੀ ਨੇ,
ਭਾਰਤ,
ਭਾਰਤੀ ਚੋਣ ਅਥਾਰਟੀ ਨੇ
ADDRESS - 114,
SANSAR WARD NO 3,
SANSAR,
TEH-PATALA, DIST-PATALA

Date: 13-9-2011

114 ਸੰਸਾਰ ਚੋਣ ਅਥਾਰਟੀ ਨੇ
ਭਾਰਤੀ ਚੋਣ ਅਥਾਰਟੀ ਨੇ

Facsimile Signature of the Electoral
Registration Officer for
114-Sansar - Constituency

ਉਪਰੋਕਤ ਡਾ. ਖਾਤਾ ਨੰਬਰ ਅਤੇ ਚੋਣ ਅਥਾਰਟੀ ਨੇ
ਭਾਰਤੀ ਚੋਣ ਅਥਾਰਟੀ ਨੇ ਚੋਣ ਅਥਾਰਟੀ ਨੇ
In case of change in address, mention the card
number in the relevant form for including your name
in the roll at the changed address and to obtain the
card with the same number. 114 / 7 / 1318

129
39

Exhibit 22



DECLARATION OF SHAMSHER SINGH

I, SHAMSHER SINGH S/o SANT RAM, R/o Near Shiv Mandir, Raghon Majra Tehsil & District PATIALA, PUNJAB (INDIA), Uncle of MOHINDER SINGH, father of DALJIT SINGH, declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Raghbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know well Daljit Singh worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.



VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES



3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 25 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.



5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

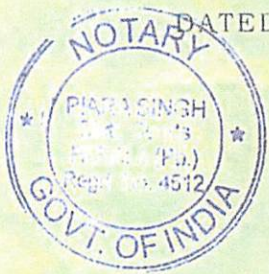


6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening his family.



VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

- 7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.
- 8. I do not read or speak English. My declaration has been translated to me in Punjabi, and affirm it is true and correct.



DATED this _____ day of 28 - 01 - 2013

ਸ਼ਮਸ਼ੇਰ ਸਿੰਘ

The Contents of this Affidavit/
document have been read over to
the deponent He/She has accepted
it true & Correct

SHAMSHER SINGH

I, Lalit Goyal, am fluent in both Punjabi and English. I have translated the above to Shamsheer Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this _____ day of 28 - 01 - 2013

Print Name



ਮਹਿਮਾ

ATTESTED
[Signature]
NOTARY PUBLIC
PATIALA (PB) INDIA


28 JAN 2013

133
23

2595 / 10/10
Handwritten signature and scribbles

SHYAM KUMAR
Stamp Vendor
Distt. Courts,
Palani

29/1/39
Handwritten signature


 ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 ELECTION COMMISSION OF INDIA
 IDENTITY CARD
 LBV3523032



ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਸ਼ਮਸ਼ੇਰ ਸਿੰਘ

ELECTOR'S NAME : SHAMSHER SINGH

ਪਿਤਾ ਦਾ ਨਾਂ : ਸੰਤ ਰਾਮ

FATHER'S NAME : SANT RAM

ਲਿੰਗ / SEX : ਮੁਰਮ / MALE

ਜਨਮ ਮਿਤੀ / DATE OF BIRTH : 19/03/1954

LBV3523032

ਠੇਕਾ : ਮ.ਨੰ. 23 ਠੇਕਾ ਸਿਵਪੁਰੀ (ਰਾਮੀ ਮਾਸਰਾ)
 ਪਟਿਆਲਾ
 ਪ੍ਰਸਿਧੀਕ ਪਟਿਆਲਾ
 ਜਿਲ੍ਹਾ - ਪਟਿਆਲਾ
 Address : PNO 23 THAKA SHIVPURI (RAMI MASARA)
 PATIALA
 TEHSIL PATIALA
 DIST - PATIALA

Date : 21-12-2007

076-ਪਟਿਆਲਾ ਠੇਕਾ ਸੰਗ੍ਰਹਿ ਮਹਾਂ
 ਚੋਣ ਕਮਿਸ਼ਨ ਦੇ ਚੋਣਕਾਰਾਂ ਦਾ ਵਿਸ਼ੇਸ਼ ਨਿਯੰਤਰਣ ਅਧਿਕਾਰੀ
 ਦਾ ਦਸਤਖਤ ਦਾ ਫੇਕਸਿਲ ਸਿੱਕਾ
 Facsimile Signature of
 Electoral Registration Officer
 076-PATIALA TOWN Assembly
 Constituency

ਜੇਕਰ ਠੇਕਾ ਬਦਲਿਆ ਜਾਂਦਾ ਹੈ, ਤਾਂ ਚੋਣਕਾਰ ਨੂੰ ਆਪਣੇ ਚੋਣਕਾਰੀ ਨੰਬਰ
 ਅਤੇ ਠੇਕੇ ਦਾ ਨਵਾਂ ਪਤਾ ਦਿੱਤਾ ਜਾਵੇ ਤਾਂ ਚੋਣਕਾਰੀ ਨੰਬਰ ਦਾ
 ਵਰਤੋਂ ਕਰਕੇ ਆਪਣੇ ਚੋਣਕਾਰੀ ਨੰਬਰ ਨੂੰ ਆਪਣੇ ਨਵੇਂ ਠੇਕੇ ਦੇ
 ਠੇਕੇ ਵਿਖੇ ਭੇਜਣਾ ਹੈ।
 In case of change in address, mention this Card
 Number in the relevant form for including your name
 in the roll at the changed address and to obtain the
 card with the same number. 92-510

ਸ਼ਮਸ਼ੇਰ ਸਿੰਘ

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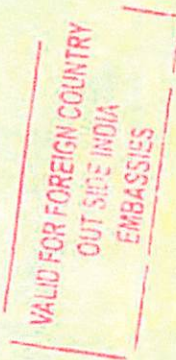
Exhibit 23



DECLARATION OF SHYAM SINGH

I, SHYAM SINGH S/o AJMER SINGH, R/o Village Kartarpur P.O. Jogipur Tehsil & District PATIALA, PUNJAB (INDIA) uncle of DALJIT SINGH S/o MOHINDER SINGH, declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. On 18 March 2010, Daljit's father call me to hospital, when I reach there, his parents and Raghbir Singh tell me about happening with Daljit that it was approximately 11:00 p.m., Raghbir Singh was working in his fields, suddenly he heard screams of somebody and he asked who was there because it was dark, when he reach near, he saw some peoples beating a guy with wooden sticks and swords, when they saw Raghbir Singh the men stopped beating Daljit and ran. Then he took Daljit to the hospital. He had a broken finger and deep wound to his arm. Daljit's parents tried to file a complaint with the police, I was also with them but they told us to go away and would not hear our complaint or provide Daljit safety or us. They told us Daljit needed to stop his social work. I know Daljit Singh, he worked as a social worker for and was a member of Shiromani Akali Dal Amritsar Political Party. This political party



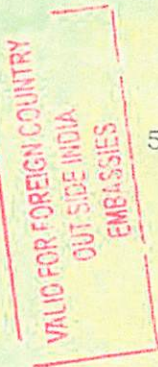
137
44

is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.

3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit to his home. He was unconscious, so we took him to the hospital to the doctor.
5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents if they did not tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.
6. So after that Daljit's father and mother decided to send Daljit to his sister home where he would be safe for a little while. They told her to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the



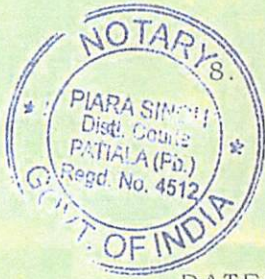
NO
PIARAS
DIST. COURT
PATIALA (PB.)
REGD. NO. 4512
IND



VALID FOR FOREIGN COUNTRY
OUTSIDE INDIA
EMBASSIES

police and Congress Party were also threatening his family.

7. He is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.



I do not read or speak English. My declaration has been translated to me in Punjabi, and affirm it is true and correct.

DATED this _____ day of 29-01, 2013

The Contents of this Affidavit/ document have been read over to the deponent He/She has accepted it true & correct

Shyam Singh

SHYAM SINGH

Shyam Singh



I, baljit goyal, am fluent in both Punjabi and English. I have translated the above to Shyam Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this _____ day of 29-01, 2013

Print Name

Mohinder

ATTESTED

NOTARY PUBLIC
PATIALA (PB) INDIA

29 JAN 2013

139
4A


2593 ¹⁰ 12/10/2



Handwritten signature and scribbles

371

29-1-13

RAJINDER KUMAR
Stamp Vendor
Distt. Courts,
Patiala



 भारत संघ अधिका
 निर्वाचनी आयोग
ELECTION COMMISSION OF INDIA
IDENTITY CARD
 UKH0013300

चयनकर्ता का नाम : शिवम सिंह
 ELECTOR'S NAME : SHIVAM SINGH
 पिता का नाम : अमर सिंह
 FATHER'S NAME : AMAR SINGH
 लिंग / SEX : पुरुष / MALE
 प्रवेश तिथि / DATE OF BIRTH : 05/07/1970

UKH0013300

पता : 100, 27
 कार्तारपुर
 जिला - पटाला
 Address : 100, 27
 KARTARPUR
 TEHSIL-PATALA
 DISTT. PATALA



Date : 25-08-2008
 114-संसद निर्वाचन क्षेत्र
 114-संसद निर्वाचन क्षेत्र
 114-संसद निर्वाचन क्षेत्र
 114-संसद निर्वाचन क्षेत्र
 114-संसद निर्वाचन क्षेत्र
 Facsimile Signature of
 Electoral Registration Officer
 114-SANCUR Assembly Constituency

In case of change in address, mention this Card
 Number in the relevant form for including your name
 in the roll at the changed address and to obtain the
 card with the same number. 483099

Shivam Singh

41
5

Exhibit 24



DECLARATION OF TEJINDER SINGH

I, TEJINDER SINGH S/o SURJIT SINGH, R/o Gurmukh Colony, Tehsil SAMANA District PATIALA, PUNJAB (INDIA) husband of RANJIT KAUR SISTER of DALJIT SINGH D/o MOHINDER SINGH, declare that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from our own personal knowledge and recollection.
2. My Brother-in-law is Daljit Singh. He married with NAVDEEP KAUR. He has three children together. Their children live in Fatehpur Road, V.P.O. Sanour, Tehsil and District Patiala, Punjab (INDIA). When my Brother-in-law lived in India, he worked as a retail supervisor for a store in Patiala, India. He also worked as a social worker for and was a member of Shiromani Akali Dal Amritsar political party. This political party is also known as Maan Dal. He was also a member of the Kissan Union in Punjab, India.
3. As a social worker, he helped women in India purchase sewing machines and learn how to sew, so they would have employment. He also helped them fix their sewing machines when they would break.
4. The Congress Party and the Sarsewala political group did not like Daljit's social work. On the evening of 28 January 2010, when he was coming home from after visiting his parents in law, he was stopped by several men, who beat him; they told him he must stop his social work and stop being a member of the Shiromani Akali Dal Amritsar

VALID FOR FOREIGN COUNTRY
OUTSIDE INDIA
EMBASSIES



political party. Some people from our village came upon the men beating Daljit; the men stopped and ran. The people from our village brought Daljit home. He was unconscious, so we took him to the hospital to the doctor.



5. On 25 February 2010, approximately 3-4 men came to their house, asking for Daljit. They threatened Daljit's parents tell them where Daljit was. They told Daljit's father that he saved his son's life before, but if Daljit did not stop his social work and political party activity, he would suffer bad consequences.

6. On 17 March 2010, my brother-in-law was coming home from his job; it was approximately 11:00 p.m. A man approached him; he was dressed like a policeman. Suddenly, five other men came from out of a field and started beating Daljit. Daljit told me they beat him with wooden sticks and swords, and told him he did not obey their commands to stop his social work and political activity. A farmer heard Daljit's screams, he asked who was there because it was dark, and the men stopped beating Daljit and ran away. The farmer took brother-in-law to the hospital. He had a broken finger and deep wound to his arm.



NC
OF IT

7. Daljit's parents tried to file a compliant with the police, but they told us to go away and would not hear our compliant or provide Daljit safety or us. They told us Daljit needed to stop his social work.

8. My father and mother-in-law decided to send Daljit to my home where he would be safe for a little while. They told me to help Daljit go to New Delhi and apply for a visa to leave India because he was not safe; and the police and Congress Party were also threatening our family.

VALID FOR FOREIGN COUNTRY
OUT SIDE INDIA
EMBASSIES

- 9. I miss my brother-in-law too much because he is only brother of two sisters and a son of his parents, but if he come back to his village to live with his children's; I am afraid they will kill him.
- 10. I do not read or speak English. My declaration has been translated to me in Punjabi, and I affirm it is true and correct.

DATED this _____ day of 29 - 01 - _____, 2013



Tejinder Singh
TEJINDER SINGH

The Contents of this Affidavit document have been read over to the deponent He/She/It as per the 'I true & correct'

and English. I have translated the above to Tejinder Singh, who state the above declaration is true and accurate to the best of his knowledge.

DATED this _____ day of 29 - 01 _____, 2013



[Signature]

[Signature]

Print Name

Identify the person to whom this document is given

[Signature]



29 Jan 2013

2604

10-10-22

[Handwritten signature]

RAJINDER KUMAR
Stamp Vendor
Distt Courts,
Patiala

91131


ELECTION COMMISSION OF INDIA
IDENTITY CARD

ਤਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 ਸ਼ਨਾਖਤੀ ਕਾਰਡ **HYH2847267**



ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਤਜਿੰਦਰ ਸਿੰਘ
 Elector's Name : **TAJINDER SINGH**
 ਪਿਤਾ ਦਾ ਨਾਂ : ਸੁਰਜੀਤ ਸਿੰਘ
 Father's Name : **SURJIT SINGH**
 ਲਿੰਗ / Sex : ਪੁਰਸ਼ / **MALE**
 1.1.2006 ਨੂੰ ਉਮਰ : 21 ਸਾਲ
 Age as on 1.1.2006 : 21 Years

HYH2847267

ਪਤਾ : ਮ.ਨੰ. 53 ਮਲਕਾਨਾ ਪੱਤੀ
 ਸਮਾਣਾ
 ਤਹਿਸੀਲ ਸਮਾਣਾ, ਜ਼ਿਲ੍ਹਾ ਪਟਿਆਲਾ

Address : HNO, 53 MALIKANA PATTI
 SAMANA
 TEHSAMANA, DISTT.PATIALA

075 - ਸਮਾਣਾ ਪਟਿਆਲਾ ਦੇ
 ਚੋਣਕਾਰ ਰਜਿਸਟਰੇਸ਼ਨ ਅਫਸਰ ਦੇ
 ਹਸਤਾਖਰ ਦਾ ਚਿੰਨ੍ਹ ਹਿੱਨ ਉਤਾਰਾ

Facsimile Signature of the
 Electoral Registration Officer
 for 075 - SAMANA Constituency

ਥਾਂ : ਸਮਾਣਾ ਮਿਤੀ : 29-11-2006
 Place : SAMANA Date : 29-11-2006

ਇਸ ਕਾਰਡ ਦੀ ਵੱਖ ਵੱਖ ਸਰਕਾਰੀ ਸਕੀਮਾਂ ਲਈ
 ਸ਼ਨਾਖਤੀ ਕਾਰਡ ਦੇ ਤੌਰ ਤੇ ਵਰਤੋਂ ਕੀਤੀ ਜਾ ਸਕਦੀ ਹੈ।
 This Card may be used as an Identity Card under
 different Government Schemes.

Tajinder Singh

147
51

Exhibit 25

DECLARATION OF DALJIT SINGH

I, DALJIT SINGH, declare under penalty of perjury according to the laws of the State of Washington that the following is true and correct:

1. I am over the age of 18 years, am competent to testify in a court of law, and voluntarily provide this statement from my own personal knowledge and recollection.
2. I was born in Patiala, Punjab, India on April 18, 1981.
3. My parents are Mohinder Singh, and Manjit Kaur.
4. I am married to Navdeep Kaur; we have three children: Inderpal Singh (DOB: 09/09/2000); Gurleen Kaur & Harleen Kaur (Twins) (DOB: 01/26/2003).
5. I went to school and graduated from Government High School in Sanour Distt Patiala, India.
6. After I graduated from school, I began working with *Reliance Petroleum*, and then I went to work for *Aditya Birla Limited*, a grocery retail store, where I worked as a supervisor.
7. After working for a few years at the grocery store, the President of Akali Dal Amritsar, asked me to join the party. His name is Harbhajan Singh Kashmiri. He saw that my work was good and asked me to join the party.
8. As a member of this political party, Shiromani Akali Dal Amritsar, I worked for the Kissan Union in Punjab, India, which is a consortium of Indian farmer associations.
9. As a member of Shiromani Akali Dal Amritsar party, I also worked as a social worker, where I assisted Indian women with sewing machine

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8

instruction, to provide them with a resource for employment. I also assisted them in sewing machine repair as needed.

10. The Sarsewala group did not like me being a member of the Shiromani Akali Dal Amritsar and my work in helping women.
11. On January 28, 2010, while I was returning from visiting my wife's parents, I was stopped by a group of approximately five (5) men. They started beating me; they beat me with their hands and threw me to the ground and kicked me. They told me that I must stop my social work with women, and give up my membership with the Shiromani Akali Dal Amritsar party, or else they would kill me. Members of my village came by and witnessed me being beaten. After the men finished beating me, they ran away. Some of the residents of my village brought me to my parents' home. Since I was unconscious, my parents took me to the hospital for treatment.
12. On February 25, 2010, approximately four (4) men came by my home and asked for me. They threatened my parents to tell them where I was, and demanded that I leave my social work and the Shiromani Akali Amritsar political party. The reason they came by my house was that they knew I was going to take part in a cultural program that was to take place March 5, 2010. They had told me not to take part in in this program. They threatened to kill me if I participated in this program. They also threatened my parents, stating, "the last time he survived, but this time he is not going to survive".
13. On the night of March 17, 2010, at around 11:00 p.m. to 11:30 p.m., I was coming home from work when a man dressed as a police officer stopped me. Suddenly, about four or five other men came out from the field and starting beating me and threw me to the ground. They told me that because I went

against them, and did not stop my social work, or political activities, that I would suffer the consequences for going against them. They beat me with wooden sticks, and broke the middle finger of my left hand, and cut my arm with something sharp, leaving a deep scar on my left arm. They continued to beat me for 10 to 15 minutes. When a local farmer heard me screaming, and asked who was there, this scared the men away and they left me in the field. The farmer took me to the hospital.

14. After this incident, my parents told me to go live with my sister and brother-in-law, as they feared for my safety; I had too many enemies and could no longer be protected.
15. I lived with my sister and brother-in-law for two or three months, and then they sent me to Delhi. I stayed in Delhi for a little over a month. From there I obtained a visa to go to Ecuador, and went to Ecuador. From Ecuador, I got a visa for Guatemala. When I arrived in Guatemala, a smuggler helped us to cross the border through the river to Mexico. After I entered Mexico, I stayed there for one and half months and then another person help us enter the United States.
16. A man from Mexico brought me into the United States. He charged me \$3,000, and was supposed to take \$2,000 when we reached Houston. After we reached Houston, the smuggler told me I was on my own.
17. On the evening of December 22, 2010, I was interviewed by the U.S. Border Patrol. I remember that I was very tired because I had been walking for about three days, and my body was in bad condition. This was the same night I was apprehended, and I was placed under oath to tell the truth. During the interview, I told the U.S. immigration officer that I would be harmed if I go

back to India because of my religion. Sarsewala is a false guru who is works for Congress, and is politically and religiously against Sikhs. Since my party membership is associated with my religion, Sarsewala is against the values and activities of the Shiromani Akali Dal Amritsar.

18. **Bhaniara wala Baba burned our religious book; no legal or social action can be taken against him. Bhaniara wala Baba also works for Congress and is against Sikhs with the purpose to end the Sikh religion. If you speak out against them, they will threaten, kidnap, and beat you, and sometimes beat your family.**
19. **I do not believe I could live safely in India. The Sarsewala and the Congress will torture me because I am a member of the Sikh religion, and they will torture me if I try to go against them. They are trying to destroy and end our religion. There, Congress party is the one that rules; and they are not taking any action against the Sarsewala party. Even in the riots that took place in 1984, the Congress did not take any action of protection for the Sikhs.**
20. **I was even arrested one time in India for protesting against the Sarsewala. The police arrested me because they did not want me to protest – even though this was done in a peaceful way. While holding me, they told me that I could not keep living and practicing as a Sikh. That evening, after threatening me, they released me.**
21. **I do not believe I could live safely in any area of India, because Congress party rules all of India, and they do things all over India. No one in the Indian government can protect me because they are against the Sikhs. India claims to be a democracy, but there is no democracy. Sometimes even the Christians and Muslims are treated badly there.**

22. I am separated from my wife and children now: this makes me very sad, but I cannot live anywhere in India because I am a Sikh and because I belong to Shiromani Akali Dal Amritsar organization that seeks to protect the religious and political freedoms for Sikhs.

DATED this 4th day of April 2013.


DALJIT SINGH

I, GURPREET, KAUR, certify that I am fluent in and understand the English language and the Punjabi language. I have read the above declaration to Daljit Singh, and to the best of his knowledge and belief, this declaration is true, accurate and correct.

DATED this 4th day of April 2013.


GURPREET KAUR

Exhibit 26

DRIVING LICENCE

DL No. 4414/1968

Date 29/5/05

Name DALJIT SINGH

Sic. W/o, D/o S. MOHINDER SINGH

Address 229, W. NO. 5, SANOUR,
DISTT. PATIALA. DOB 18-4-1981

For SCOOTER, M. CYCLE, CAR ONLY.



is Licensed to Drive Throughout India Vehicle of the Above Description

Issue Date 29/5/05

Valid Upto 28/5/2010 District Patiala

FORM OF RULE 16 (1) ISSUED BY THE LICENCING AUTHORITY PATIALA


ELECTION COMMISSION OF INDIA
IDENTITY CARD
 ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 ਸਨਾਖਤੀ ਕਾਰਡ JTW2585065

ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਦਲਜੀਤ ਸਿੰਘ
 Elector's Name : DALJIT SINGH

ਪਿਤਾ ਦਾ ਨਾਂ : ਮਹਿੰਦਰ ਸਿੰਘ
 Father's Name : MAHINDER SINGH

ਲਿੰਗ / Sex : ਪੁਰਸ਼ / MALE
 1.1.2006 ਨੂੰ ਉਮਰ : 26 ਸਾਲ
 Age as on 1.1.2006 : 26 Years

ਲੜੀ ਨੰ. Sr. No. **9T7U 169892** ਰੋਲ ਨੰਬਰ Roll No. **893902**

ਪੰਜਾਬ ਸਕੂਲ ਸਿੱਖਿਆ ਬੋਰਡ
Punjab School Education Board
 ਮੈਟ੍ਰਿਕੁਲੇਸ਼ਨ ਪਰੀਖਿਆ ਸਾਰਚਮਾਨੀ, ੧੯੯੭
 Matriculation Examination, March/April, 1997
 ਨਤੀਜਾ ਕਾਰਡ / DETAILED MARKS CARD

ਨਾਂ Name **ਦਲਜੀਤ ਸਿੰਘ**
DALJIT SINGH

ਪਿਤਾ ਦਾ ਨਾਂ Father's Name **ਮਹਿੰਦਰ ਸਿੰਘ**
MOHINDER SINGH

ਮਾਤਾ ਦਾ ਨਾਂ Mother's Name **ਮਨਜੀਤ ਕੌਰ**
HANJIT KAUR

ਜਨਮ ਮਿਤੀ / Date of Birth **18/04/81**

ਨਤੀਜਾ / Result **ਪਾਸ**

ਲੜੀ ਨੰ. Sr. No.	ਵਿਸ਼ਾ Subject	ਪ੍ਰਾਪਤ ਅੰਕ Marks Obt.	ਨਤੀਜਾ Result	ਕੁੱਲ ਅੰਕ Total Marks	ਪਾਸ ਅੰਕ Pass Marks
1.	ਪੰਜਾਬੀ / Punjabi (ਜਾਂ / or) ਪੰਜਾਬ ਦਾ ਇਤਿਹਾਸ ਅਤੇ ਸੱਭਿਆਚਾਰ Pb. History & Culture	078	ਪ	150	50
2.	ਅੰਗਰੇਜ਼ੀ / English	059	ਪ	100	33
3.	ਹਿੰਦੀ / Hindi	037	ਪ	100	33
4.	ਗਣਿਤ / Mathematics	023	ਦ	100	33
5.	ਸਾਇੰਸ / Science ਲਿਖਤੀ 040 ਪ੍ਰਯੋਗੀ 019 Theory Practical	059	ਪ	75 } 100 25 } 7	22 } 33
6.	ਸਮਾਜਿਕ ਸਿੱਖਿਆ / Social Studies	059	ਪ	100	33
7.				100	33
ਕੁੱਲ ਅੰਕ / TOTAL MARKS		292		650	
ਦੋ ਸੌ ਬਾਨਵੇ					

ਵਿਸ਼ਾ / SUBJECT

1. ਐਸ. ਯੂ. ਪੀ. ਡਬਲਿਊ / SUPW ਕੀਪ

2. ਸਿਹਤ ਤੇ ਸਰੋਕ ਸਿੱਖਿਆ / Health & Physical Education

ਪ੍ਰਾਪਤ ਦਰਜਾ / GRADING

A

A

ਪ੍ਰਿੰਸੀਪਲ ਅਜੀਤ ਸਿੰਘ ਨਗਰ / S.A.S. Nagar
 ਤੀ / Date : **10 ਜੂਨ 1997** ਸਕੱਤਰ / SECRETARY

Exhibit 27

DI No. 4414/1968
 Date of Issue 27/5/85
 Name DALJIT SINGH
 No. of Vehicle S. MOHINDER SINGH
 Address 229, W. NO. 5, SANOUR,
DIST. PATNAIA. 00818-4-1981
 For SCOOTER, CYCLE, CAR ONLY.
 is Licensed to Drive Throughout India Vehicle of the Above Description
 Issue Date 27/5/85
 Valid Upto 27/5/90 District PATNAIA
 FORM OF RULE 16 (ii) ISSUED BY THE LICENSING AUTHORITY PATNAIA


ELECTION COMMISSION OF INDIA
IDENTITY CARD
 ਭਾਰਤ ਚੋਣ ਕਮਿਸ਼ਨ
 ਸਨਾਖਤੀ ਕਾਰਡ JTW2585065



ਚੋਣਕਾਰ ਦਾ ਨਾਂ : ਦਲਜੀਤ ਸਿੰਘ
 Elector's Name : DALJIT SINGH
 ਪਿਤਾ ਦਾ ਨਾਂ : ਮਹਿੰਦਰ ਸਿੰਘ
 Father's Name : MAHINDER SINGH
 ਲਿੰਗ / Sex : ਪੁਰਸ਼ / MALE
 1.1.2006 ਨੂੰ ਉਮਰ : 25 ਸਾਲ
 Age as on 1.1.2006 : 26 Years

ਲੜੀ ਨੰ. Sr. No. 9T7U 169892
 ਰੋਲ ਨੰਬਰ Roll No. 893982

ਪੰਜਾਬ ਸਕੂਲ ਸਿੱਖਿਆ ਬੋਰਡ
Punjab School Education Board
 ਮੈਟ੍ਰਿਕੂਲੇਸ਼ਨ ਪਰੀਖਿਆ ਸਾਰਬੰਧਕ, ੧੯੯੭
 Matriculation Examination, March 1997
 ਨਤੀਜਾ ਕਾਰਡ / DETAILED MARKS CARD

ਨਾਮ Name ਦਲਜੀਤ ਸਿੰਘ DALJIT SINGH
 ਪਿਤਾ ਦਾ ਨਾਂ Father's Name ਮਹਿੰਦਰ ਸਿੰਘ MOHINDER SINGH
 ਮਾਤਾ ਦਾ ਨਾਂ Mother's Name ਮਨਜੀਤ ਕੌਰ MANJIT KAUR
 ਜਨਮ ਮਿਤੀ / Date of Birth 18/04/81
 ਨਤੀਜਾ / Result ਪਾਸ

ਲੜੀ ਨੰ. / Sr. No.	ਵਿਸ਼ਾ / Subject	ਪ੍ਰਾਪਤ ਅੰਕ / Marks Obt.	ਨਤੀਜਾ / Result	ਕੁੱਲ ਅੰਕ / Total Marks	ਪਾਸ ਅੰਕ / Pass Mark
1.	ਪੰਜਾਬੀ / Punjabi (ਜਾਂ / or) ਪੰਜਾਬ ਦਾ ਇਤਿਹਾਸ ਅਤੇ ਸੱਭਿਆਚਾਰ Pb. History & Culture	078	ਪ	150	50
2.	ਅੰਗਰੇਜ਼ੀ / English	059	ਪ	100	33
3.	ਹਿੰਦੀ / Hindi	037	ਪ	100	33
4.	ਗਣਿਤ / Mathematics	023	ਦ	100	33
5.	ਸਾਇੰਸ / Science ਲਿਖਤੀ / Theory 040 ਪ੍ਰਯੋਗੀ / Practical 019	059	ਪ	75 } 100 25 } 7	22 } 33
6.	ਸਮਾਜਿਕ ਸਿੱਖਿਆ / Social Studies	059	ਪ	100	33
7.				100	33
ਕੁੱਲ ਅੰਕ / TOTAL MARKS		292		650	
ਦੇ ਸੇ ਟਾਨਟੇ					
ਵਿਸ਼ਾ / SUBJECT		ਪ੍ਰਾਪਤ ਦਰਜਾ / GRADING			
1. ਐਮ. ਟੂ ਪੀ ਸੁਪਰਿੰਟੈਂਡੈਂਟ / SUPW ਕੰਪ		A			
2. ਸਿਹਤ ਤੇ ਸਰੀਰਕ ਸਿੱਖਿਆ / Health & Physical Education		A			

ਵਿਭਾਗ ਦਾ ਅਧਿਕਾਰੀ ਸਿੰਘ ਨਗਰ / S.A.S. Nagar
 ਤਾਰੀਖ / Date : 18 ਜੂਨ 1997
 ਸਕੱਤਰ / SECRETARY

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Exhibit 28

Exhibit 29

**I-589, Application for Asylum
and for Withholding of Removal**

START HERE - Type or print in black ink. See the instructions for information about eligibility and how to complete and file this application. There is NO filing fee for this application.

NOTE: Check this box if you also want to apply for withholding of removal under the Convention Against Torture.

Part A. I. Information About You

1. Alien Registration Number(s) (A-Number) (if any) A#200-893-771		2. U.S. Social Security Number (if any) N/A	
3. Complete Last Name SINGH		4. First Name DALJIT	
5. Middle Name			
6. What other names have you used (include maiden name and aliases)? NONE			
7. Residence in the U.S. (where you physically reside) WILLACY DETENTION CENTER		Telephone Number (956) 689-9218	
Street Number and Name 1800 INDUSTRIAL DRIVE		Apt. Number N/A	
City RAYMONDVILLE	State TEXAS	Zip Code N/A	
8. Mailing Address in the U.S. (if different than the address in No. 7) In Care Of (if applicable): SAME AS ABOVE		Telephone Number () N/A	
Street Number and Name N/A		Apt. Number N/A	
City N/A	State N/A	Zip Code N/A	
9. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	10. Marital Status: <input type="checkbox"/> Single <input checked="" type="checkbox"/> Married <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed		
11. Date of Birth (mm/dd/yyyy) 04/18/1981	12. City and Country of Birth PATIALA (INDIA)		
13. Present Nationality (Citizenship) INDIAN	14. Nationality at Birth INDIAN	15. Race, Ethnic, or Tribal Group ASIAN	16. Religion SIKH
17. Check the box, a through c, that applies: a. <input type="checkbox"/> I have never been in Immigration Court proceedings. b. <input checked="" type="checkbox"/> I am now in Immigration Court proceedings. c. <input type="checkbox"/> I am not now in Immigration Court proceedings, but I have been in the past.			
18. Complete 18 a through c. a. When did you last leave your country? (mmm/dd/yyyy) 09/28/2010 b. What is your current I-94 Number, if any? N/A			
c. List each entry into the U.S. beginning with your most recent entry. List date (mm/dd/yyyy), place, and your status for each entry. (Attach additional sheets as needed.)			
Date 12/20/2010	Place LAREDO, TEXAS	Status N/A	Date Status Expires: N/A
Date N/A	Place N/A	Status N/A	
Date N/A	Place N/A	Status N/A	
19. What country issued your last passport or travel document? N/A		20. Passport # N/A	Expiration Date (mm/dd/yyyy) N/A
		Travel Document # N/A	
22. What is your native language (include dialect, if any)? PUNJABI		23. Are you fluent in English? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		24. What other languages do you speak fluently? HINDI	
Action:		For USCIS use only. Decision:	
Interview Date:		Approval Date:	
Asylum Officer ID#:		Denial Date:	
		Referral Date:	

RECEIVED-DC
MAY 16 2011
HLG-PIDC-WIC

Ed. P. R. S. on 05/11
HLG-PIDC-WIC



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Part A. II. Information About Your Spouse and Children

Your spouse I am not married. (Skip to Your Children below.)

1. Alien Registration Number (A-Number) <i>(if any)</i> N/A		2. Passport/ID Card No. <i>(if any)</i> N/A		3. Date of Birth <i>(mm/dd/yyyy)</i> 04/29/1980		4. U.S. Social Security No. <i>(if any)</i> N/A	
5. Complete Last Name KAUR			6. First Name NAVDEEP		7. Middle Name		8. Maiden Name
9. Date of Marriage <i>(mm/dd/yyyy)</i> 11/21/1999			10. Place of Marriage FATEHPUR			11. City and Country of Birth FATEHPUR, PATIALA (INDIA)	
12. Nationality <i>(Citizenship)</i> INDIAN			13. Race, Ethnic, or Tribal Group ASIAN			14. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	
15. Is this person in the U.S.? <input type="checkbox"/> Yes <i>(Complete Blocks 16 to 24.)</i> <input type="checkbox"/> No <i>(Specify location):</i>							
16. Place of last entry into the U.S.		17. Date of last entry into the U.S. <i>(mm/dd/yyyy)</i>		18. I-94 No. <i>(if any)</i> N/A		19. Status when last admitted <i>(Visa type, if any)</i> N/A	
20. What is your spouse's current status?		21. What is the expiration date of his/her authorized stay, if any? <i>(mm/dd/yyyy)</i> N/A		22. Is your spouse in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		23. If previously in the U.S., date of previous arrival <i>(mm/dd/yyyy)</i> N/A	
24. If in the U.S., is your spouse to be included in this application? <i>(Check the appropriate box.)</i> <input type="checkbox"/> Yes <i>(Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.)</i> <input type="checkbox"/> No							

Your Children. List all of your children, regardless of age, location, or marital status.

I do not have any children. *(Skip to Part A. III., Information about your background.)*

I have children. Total number of children: 3

(NOTE: Use Form I-589 Supplement A or attach additional sheets of paper and documentation if you have more than four children.)

1. Alien Registration Number (A-Number) <i>(if any)</i> N/A		2. Passport/ID Card No. <i>(if any)</i> N/A		3. Marital Status <i>(Married, Single, Divorced, Widowed)</i> SINGLE		4. U.S. Social Security No. <i>(if any)</i> N/A	
5. Complete Last Name SINGH			6. First Name INDERPAL		7. Middle Name		8. Date of Birth <i>(mm/dd/yyyy)</i> 09/09/2001
9. City and Country of Birth PATIALA (INDIA)			10. Nationality <i>(Citizenship)</i> INDIAN		11. Race, Ethnic, or Tribal Group ASIAN		12. Gender <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S. ? <input type="checkbox"/> Yes <i>(Complete Blocks 14 to 21.)</i> <input checked="" type="checkbox"/> No <i>(Specify location.)</i> INDIA							
14. Place of last entry in the U.S.		15. Date of last entry in the U.S. <i>(mm/dd/yyyy)</i> N/A		16. I-94 No. <i>(if any)</i> N/A		17. Status when last admitted <i>(Visa type, if any)</i> N/A	
18. What is your child's current status?		19. What is the expiration date of his/her authorized stay, if any? <i>(mm/dd/yyyy)</i> N/A		20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
21. If in the U.S., is this child to be included in this application? <i>(Check the appropriate box.)</i> <input type="checkbox"/> Yes <i>(Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.)</i> <input type="checkbox"/> No							



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[Signature]

Part A. II. Information About Your Spouse and Children (Continued)

1. Alien Registration Number (A-Number) (if any) N/A		2. Passport/ID Card No. (if any) N/A		3. Marital Status (Married, Single, Divorced, Widowed) SINGLE		4. U.S. Social Security No. (if any) N/A	
5. Complete Last Name KAUR		6. First Name GURLEEN		7. Middle Name		8. Date of Birth (mm/dd/yyyy) 01/26/2003	
9. City and Country of Birth PATIALA (INDIA)		10. Nationality (Citizenship) INDIAN		11. Race, Ethnic, or Tribal Group ASIAN		12. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	
13. Is this child in the U.S. ? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input checked="" type="checkbox"/> No (Specify location.) INDIA							
14. Place of last entry into the U.S. N/A		15. Date of last entry into the U.S. (mm/dd/yyyy) N/A		16. I-94 No. (if any) N/A		17. Status when last admitted (Visa type, if any) N/A	
18. What is your child's current status? N/A		19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A		20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

21. If in the U.S., is this child to be included in this application? (Check the appropriate box.)
 Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.)
 No

1. Alien Registration Number (A-Number) (if any) N/A		2. Passport/ID Card No. (if any) N/A		3. Marital Status (Married, Single, Divorced, Widowed) SINGLE		4. U.S. Social Security No. (if any) N/A	
5. Complete Last Name KAUR		6. First Name HARLEEN		7. Middle Name		8. Date of Birth (mm/dd/yyyy) 01/26/2003	
9. City and Country of Birth PATIALA (INDIA)		10. Nationality (Citizenship) INDIAN		11. Race, Ethnic, or Tribal Group ASIAN		12. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input checked="" type="checkbox"/> No (Specify location.) INDIA							
14. Place of last entry into the U.S. N/A		15. Date of last entry into the U.S. (mm/dd/yyyy) N/A		16. I-94 No. (if any) N/A		17. Status when last admitted (Visa type, if any) N/A	
18. What is your child's current status? N/A		19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A		20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

21. If in the U.S., is this child to be included in this application? (Check the appropriate box.)
 Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.)
 No

1. Alien Registration Number (A-Number) (if any) N/A		2. Passport/ID Card No. (if any) N/A		3. Marital Status (Married, Single, Divorced, Widowed) N/A		4. U.S. Social Security No. (if any) N/A	
5. Complete Last Name N/A		6. First Name N/A		7. Middle Name N/A		8. Date of Birth (mm/dd/yyyy) N/A	
9. City and Country of Birth N/A		10. Nationality (Citizenship) N/A		11. Race, Ethnic, or Tribal Group N/A		12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	
13. Is this child in the U.S. ? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location.) N/A							
14. Place of last entry into the U.S. N/A		15. Date of last entry into the U.S. (mm/dd/yyyy) N/A		16. I-94 No. (if any) N/A		17. Status when last admitted (Visa type, if any) N/A	
18. What is your child's current status? N/A		19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A		20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No			

21. If in the U.S., is this child to be included in this application? (Check the appropriate box.)
 Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.)
 No



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Part A. III. Information About Your Background

1. List your last address where you lived before coming to the United States. If this is not the country where you fear persecution, also list the last address in the country where you fear persecution. (List Address, City/Town, Department, Province, or State and Country.)
 (NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Number and Street (Provide if available)	City/Town	Department, Province, or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
KHANSIAN ROAD, SANOUR	PATIALA	PUNJAB	INDIA	04/81	10/10
N/A	N/A	N/A	N/A	N/A	N/A

2. Provide the following information about your residences during the past 5 years. List your present address first.
 (NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Number and Street	City/Town	Department, Province, or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
1800 INDUSTRIAL DRIVE	RAYMONDVILLE	TEXAS	USA	12/10	PRESENT
N/A		N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A

3. Provide the following information about your education, beginning with the most recent.
 (NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Name of School	Type of School	Location (Address)	Attended	
			From (Mo/Yr)	To (Mo/Yr)
GOVT. HIGH SCHOOL	HIGH SCHOOL	SANOUR, PATIALA PUNJAB	01/85	10/98
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A

4. Provide the following information about your employment during the past 5 years. List your present employment first.
 (NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Name and Address of Employer	Your Occupation	Dates	
		From (Mo/Yr)	To (Mo/Yr)
PRIVATE FIRM	SUPERVISER	01/01	04/10
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

5. Provide the following information about your parents and siblings (brothers and sisters). Check the box if the person is deceased.
 (NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Full Name	City/Town and Country of Birth	Current Location
Mother KAUR MANJIT	VILLAGE KARTARPUR, INDIA	<input type="checkbox"/> Deceased INDIA
Father SINGH MOHINDER	VILLAGE SANOUR, INDIA	<input type="checkbox"/> Deceased INDIA
Sibling KAUR AMANDEEP	VILLAGE SANOUR, INDIA	<input type="checkbox"/> Deceased INDIA
Sibling KAUR RANJIT	VILLAGE SANOUR, INDIA	<input type="checkbox"/> Deceased INDIA
Sibling N/A	N/A	<input type="checkbox"/> Deceased N/A
Sibling N/A	N/A	<input type="checkbox"/> Deceased N/A



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Part B. Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part B.)

When answering the following questions about your asylum or other protection claim (withholding of removal under 241(b)(3) of the INA or withholding of removal under the Convention Against Torture), you must provide a detailed and specific account of the basis of your claim to asylum or other protection. To the best of your ability, provide specific dates, places, and descriptions about each event or action described. You must attach documents evidencing the general conditions in the country from which you are seeking asylum or other protection and the specific facts on which you are relying to support your claim. If this documentation is unavailable or you are not providing this documentation with your application, explain why in your responses to the following questions.

Refer to Instructions, Part 1: Filing Instructions, Section II, "Basis of Eligibility," Parts A - D, Section V, "Completing the Form," Part B, and Section VII, "Additional Evidence That You Should Submit," for more information on completing this section of the form.

1. Why are you applying for asylum or withholding of removal under section 241(b)(3) of the INA, or for withholding of removal under the Convention Against Torture? Check the appropriate box(es) below and then provide detailed answers to questions A and B below:

I am seeking asylum or withholding of removal based on:

- Race
- Religion
- Nationality
- Political opinion
- Membership in a particular social group
- Torture Convention

A. Have you, your family, or close friends or colleagues ever experienced harm or mistreatment or threats in the past by anyone?

- No
- Yes

If "Yes," explain in detail:

1. What happened;
2. When the harm or mistreatment or threats occurred;
3. Who caused the harm or mistreatment or threats; and
4. Why you believe the harm or mistreatment or threats occurred.

i am a sikh by religion , which is minority in india. sikhs have been categorically persecuted by hindu majority government due to being a minority, different religion and demand for separate for state from india as khalistan. the current congress government openly persecuted sikhs in 1984 where our golden Temple in Amritsar, india was attacked and thousands of sikhs performing their religious duties were ambushed. thereafter, the attacks are not open but sikhs are commonly persecuted in india along with muslims, christians or people of lower caste as hindus want india to be for hindus only. additionally i am a member of the shiromani akali dal Amritsar- led by Sr. Simranjeet Singh Maan. our demand is for separate state khalistan, where sikhs can live with freedom and not under the control of the majority hindus and congress, who discriminate and harras the sikhs and other minorities, including muslims and christians. in 2009 the hindus also attack on christians, they burn their churches, rape with their girls and burn their religious literatures. congress also support to sarse wala who play with sikhs feelings.

B. Do you fear harm or mistreatment if you return to your home country?

- No
- Yes

If "Yes," explain in detail:

1. What harm or mistreatment you fear;
2. Who you believe would harm or mistreat you; and
3. Why you believe you would or could be harmed or mistreated.

As mention above, i will face the same discrimination and threats from Hindus, Congress and Sarse wala Dera who copy of Sikhs guru's and insult and play with their religious feelings. This is due to our religion and political beliefs of a separate Khalistan state for sikhs.



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Part B. Information About Your Application (Continued)

2. Have you or your family members ever been accused, charged, arrested, detained, interrogated, convicted and sentenced, or imprisoned in any country other than the United States?

No Yes

If "Yes," explain the circumstances and reasons for the action.

Father was illegally detained and interrogated - no charges filed. against this we file a case in human right council in india before 8 years ,but all waste because all are under control of congress and hindus. we get no justice till now.

3.A. Have you or your family members ever belonged to or been associated with any organizations or groups in your home country, such as, but not limited to, a political party, student group, labor union, religious organization, military or paramilitary group, civil patrol, guerrilla organization, ethnic group, human rights group, or the press or media?

No Yes

If "Yes," describe for each person the level of participation, any leadership or other positions held, and the length of time you or your family members were involved in each organization or activity.

Member of Shiromani Akali dal Amritsar who works for peoples care and social work for them. during elections support the party and do campaigning .

B. Do you or your family members continue to participate in any way in these organizations or groups?

No Yes

If "Yes," describe for each person your or your family members' current level of participation, any leadership or other positions currently held, and the length of time you or your family members have been involved in each organization or group.

Yes, we support to Shiromani Akali dal Amritsar and we want a separate state for sikhs named khalistan.

4. Are you afraid of being subjected to torture in your home country or any other country to which you may be returned?

No Yes

If "Yes," explain why you are afraid and describe the nature of torture you fear, by whom, and why it would be inflicted.

I have Mentioned in response to above question that the sikhs have been tortured in past and the same could occur if i return to india. the workers of sarse wala are want to kill me , they try before when i am in india.sikhs have been severely beaten, kidnapped, fake encounters by police, fake cases on sikhs, playing with sikhs religious feelings by dera's which are working on the support of congress.



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Part C. Additional Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part C.)

1. Have you, your spouse, your child(ren), your parents or your siblings ever applied to the U.S. Government for refugee status, asylum, or withholding of removal?

No Yes

If "Yes," explain the decision and what happened to any status you, your spouse, your child(ren), your parents, or your siblings received as a result of that decision. Indicate whether or not you were included in a parent or spouse's application. If so, include your parent or spouse's A-number in your response. If you have been denied asylum by an immigration judge or the Board of Immigration Appeals, describe any change(s) in conditions in your country or your own personal circumstances since the date of the denial that may affect your eligibility for asylum.

2. A. After leaving the country from which you are claiming asylum, did you or your spouse or child(ren) who are now in the United States travel through or reside in any other country before entering the United States? No Yes

B. Have you, your spouse, your child(ren), or other family members, such as your parents or siblings, ever applied for or received any lawful status in any country other than the one from which you are now claiming asylum?

No Yes

If "Yes" to either or both questions (2A and/or 2B), provide for each person the following: the name of each country and the length of stay, the person's status while there, the reasons for leaving, whether or not the person is entitled to return for lawful residence purposes, and whether the person applied for refugee status or for asylum while there, and if not, why he or she did not do so.

I Travelled through DOHA, SAO PAULO, LIMA to QUITO .

3. Have you, your spouse or your child(ren) ever ordered, incited, assisted or otherwise participated in causing harm or suffering to any person because of his or her race, religion, nationality, membership in a particular social group or belief in a particular political opinion?

No Yes

If "Yes," describe in detail each such incident and your own, your spouse's, or your child(ren)'s involvement.



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Part C. Additional Information About Your Application (Continued)

4. After you left the country where you were harmed or fear harm, did you return to that country?

No Yes

If "Yes," describe in detail the circumstances of your visit(s) (for example, the date(s) of the trip(s), the purpose(s) of the trip(s), and the length of time you remained in that country for the visit(s).)

5. Are you filing this application more than 1 year after your last arrival in the United States?

No Yes

If "Yes," explain why you did not file within the first year after you arrived. You must be prepared to explain at your interview or hearing why you did not file your asylum application within the first year after you arrived. For guidance in answering this question, see Instructions, Part I: Filing Instructions, Section V. "Completing the Form," Part C.

6. Have you or any member of your family included in the application ever committed any crime and/or been arrested, charged, convicted, or sentenced for any crimes in the United States?

No Yes

If "Yes," for each instance, specify in your response: what occurred and the circumstances, dates, length of sentence received, location, the duration of the detention or imprisonment, reason(s) for the detention or conviction, any formal charges that were lodged against you or your relatives included in your application, and the reason(s) for release. Attach documents referring to these incidents, if they are available, or an explanation of why documents are not available.



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Part D. Your Signature

I certify, under penalty of perjury under the laws of the United States of America, that this evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(f) Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1546(f) United States Code, knowingly subscribes as true, any false statement with respect to a naturalization application, affidavit, or other document required by the immigration laws or regulations prescribed by the Department of Homeland Security, or knowingly presents any such application, affidavit, or other document containing any such false statement which fails to contain any reasonable basis in law or fact - shall be fined in accordance with the law or imprisoned for up to 25 years. I authorize the release of any information from my immigration file to USCIS needs to determine eligibility for the benefit I am applying for.



WARNING: Applicants who are in the United States illegally are subject to removal if their asylum or withholding claims are not granted by an asylum officer or an immigration judge. Any information provided in completing this application may be used as a basis for the institution of, or as evidence in, removal proceedings even if the application is later withdrawn. Applicants determined to have knowingly made a frivolous application for asylum will be permanently ineligible for any benefits under the Immigration and Nationality Act. You may not avoid a frivolous finding simply because someone advised you to provide false information in your asylum application. If filing with USCIS, unexcused failure to appear for an appointment to provide biometrics (such as fingerprints) and your biographical information within the time allowed may result in an asylum officer dismissing your asylum application or referring it to an immigration judge. Failure without good cause to provide DHS with biometrics or other biographical information while in removal proceedings may result in your application being found abandoned by the immigration judge. See sections 208(d)(5)(A) and 208(d)(6) of the INA and 8 CFR sections 208.10, 1208.10, 208.20, 1003.47(d) and 1208.20.

Print your complete name. SINGH DALJIT	Write your name in your native alphabet. DALJIT SINGH
---	--

Did your spouse, parent, or child(ren) assist you in completing this application? No Yes (If "Yes," list the name and relationship.)

(Name)	(Relationship)	(Name)	(Relationship)
Did someone other than your spouse, parent, or child(ren) prepare this application? <input type="checkbox"/> No <input type="checkbox"/> Yes (If "Yes," complete Part E.)			
Asylum applicants may be represented by counsel. Have you been provided with a list of persons who may be available to assist you, at little or no cost, with your asylum claim? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			

Signature of Applicant (The person in Part A.1.)

[Daljit Singh]
Sign your name so it all appears within the brackets

Date (mm/dd/yyyy)

Part E. Declaration of Person Preparing Form, if Other Than Applicant, Spouse, Parent, or Child

I declare that I have prepared this application at the request of the person named in Part D, that the responses provided are based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language or a language he or she understands for verification before he or she signed the application in my presence. I am aware that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. 1324c and/or criminal penalties under 18 U.S.C. 1546(a).

Signature of Preparer		Print Complete Name of Preparer	
Daytime Telephone Number ()		Address of Preparer: Street Number and Name	
Apt. No.	City	State	Zip Code



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Part F. To Be Completed at Asylum Interview, if Applicable

NOTE: You will be asked to complete this part when you appear for examination before an asylum officer of the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS).

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are all true or not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date (mm/dd/yyyy)

Write Your Name in Your Native Alphabet

Signature of Asylum Officer

Part G. To Be Completed at Removal Hearing, if Applicable

NOTE: You will be asked to complete this Part when you appear before an immigration judge of the U.S. Department of Justice, Executive Office for Immigration Review (EOIR), for a hearing.

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are all true or not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date (mm/dd/yyyy)

Write Your Name in Your Native Alphabet

Signature of Immigration Judge



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Supplement A, Form I-589

A-Number (If available) A# 200-893-771	Date
Applicant's Name SINGH DALJIT	Applicant's Signature

List All of Your Children, Regardless of Age or Marital Status
(NOTE: Use this form and attach additional pages and documentation as needed, if you have more than four children)

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete blocks 14 to 21.) <input type="checkbox"/> No (Specify location.) N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (if any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete blocks 14 to 21.) <input type="checkbox"/> No (Specify location.) N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (if any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

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Additional Information About Your Claim to Asylum

A-Number (if available)

A# 200-893-771

Date

Applicant's Name

SINGH DALJIT

Applicant's Signature

NOTE: Use this as a continuation page for any additional information requested. Copy and complete as needed.




Part B

Question A

IN INDIA SIKHS DAILY LIFE DOES NOT PERMIT US TO BE OPENLY ABLE TO PRACTICE OUR RELIGION OR TO BE ABLE TO AFFORD TO GO TO THE SAME SCHOOLS, EMPLOYMENT, SOCIAL, POLITICAL AND RELIGIOUS GATHERINGS AS AVAILABLE TO HINDUS IN INDIA. AMONG THE DAILY DISCRIMINATION AND CONSTANT WATCH UNDER THE CURRENT CONGRESS GOVERNMENT.THEY ARE AGAINST OF SHIROMANI AKALI DAL, AMRITSAR AND THEY ACTIVITIES FOR SOCIAL DUTIES FOR POOR AND LOWER CAST PEOPLES. THE DERA SARSE WALA WHO HAS A SUPPORT OF CONGRESS, COPY OF SIKHS GURU, DRESS LIKE HIM , MANY ACTIVITES DO LIKE SIKHS. AGAINST HIM MANY CASES OF RAPE, SEXUAL HARASHMENT AND MURDER OF JOURNALIST. BUT NO ACTION AGAINST HIM BY LAW DUE TO SUPPORT OF POLITICS. I HAVE ALSO SUFFERED PERSECUTION AND TORTURE BY WORKERS OF CONGRESS & SARSE WALA.THE BEAT ME ON 28-JANUARY-2010 & 17-MARCH -2010 TO LEAVE THE SHIROMANI AKALI DAL, AMRITSAR AND THEY ACTIVITIES FOR SOCIAL DUTIES FOR POOR AND LOWER CAST PEOPLES AND OUR DEMAND FOR KHALISTAN.




Exhibit 30

Family Name (CAPS) SINGH, DALJIT		First	Middle	Sex M	Hair BLK	Eyes BRO	Complexion MED
Country of Citizenship INDIA	Passport Number and Country of Issue	File Number CASE No: CAR1112000069 A200 893 771		Height 65	Weight 195	Occupation LABORER	
U.S. Address				Scars and Marks LION			
Date, Place, Time, and Manner of Last Entry 12/20/2010, 1600, 41 mile(s) NW of LCB, PWA (AFOOT)			Passenger Boarded at		F.B.I. Number 587137KD4		
Number, Street, City, Province (State) and Country of Permanent Residence KHANSIAN ROAD PATIALA, PUNJAB, INDIA				<input type="checkbox"/> Single <input type="checkbox"/> Divorced <input checked="" type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated			
Date of Birth 04/18/1981 Age: 29				Date of Action 12/22/2010		Location Code DRT/CAR	
City, Province (State) and Country of Birth PATIALA, PUNJAB, INDIA			AR <input checked="" type="checkbox"/> Form: (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>		Method of Location/Apprehension PB		
NIV Issuing Post and NIV Number		Social Security Account Name		At/Near CARRIZO SPRINGS, TX		Date/Time 12/22/2010 2130	
Date Visa Issued		Social Security Number		By See Narrative			
Immigration Record NEGATIVE				Criminal Record None Known			
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate) See Narrative					Number and Nationality of Minor Children TWO INDIA		
Father's Name, Nationality, and Address, if Known See Narrative				Mother's Present and Maiden Names, Nationality, and Address, if Known See Narrative			
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Systems Checks See Narrative		Charge Code Word(s) I7A1	
Name and Address of (Last)(Current) U.S. Employer			Type of Employment		Salary		Employed from/to
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) FINS #: 1112960200    <p>ARREST COORDINATES: ----- Latitude: 28.5852 Longitude: -99.6788</p> <p>ARRESTING AGENT: ----- JOEL MC CRAW ERIC FLORES</p> <p>ERIC FLORES BORDER PATROL AGENT (Signature and Title of Immigration Officer)</p>							
Alien has been advised of communication privileges				EF 12/23/10 (Date/Initials)			
Distribution:				Received (Subject and Documents) (Report of Interview)			
				Officer: ERIC FLORES			
				on: December 22, 2010 at 2257 (time)			
				Disposition: Expedited Removal with Credible Fear			
				Examining Officer: FERNANDO BERMEJ			


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Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
<p>BRETT SOWERS BRYAN GREW</p> <p>SPOUSE NAME AND ADDRESS: ----- Nationality: INDIA KAUR, NAVDEEP PATIALA, PUNJAB, INDIA</p> <p>FATHER NAME AND ADDRESS: ----- Nationality: INDIA MOHINDER KHANSIAN ROAD PATIALA, PUNJAB, INDIA</p> <p>MOTHER NAME AND ADDRESS: ----- Nationality: INDIA MANJIT KHANSIAN ROAD PATIALA, PUNJAB, INDIA</p> <p>ASSISTING ASSETS: ----- Scopes</p> <p>FUNDS IN POSSESSION: ----- United States Dollar .00 <i>x Daljit</i></p> <p>RECORDS CHECKED: ----- CIS Negative CLAIM Negative EARM Negative IAPIS Negative <i>/ EF</i> IBIS Negative NAIS Negative NIIS Negative SEVIS Negative</p> <p>NARRATIVE: ----- ENCOUNTER: SUBJECT SINGH, Daljit (A# 200 893 771) was encountered by Border Patrol Agents in an Alien Smuggling load near Brundage, Texas on December 22, 2010 at approximately 8:00 p.m. At</p>		
Signature  ERIC FLORES	Title BORDER PATROL AGENT	

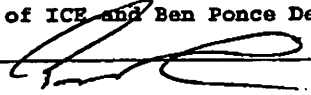
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Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
<p>the time of apprehension the SUBJECT was wearing soiled clothing and was emitting a strong body odor. He also had small cuts and scratches on his arms and had grass and small sticks stuck to his hair and clothing. These characteristics are consistent with illegal aliens who have been walking through the brush for several days in order to avoid apprehension. SUBJECT was asked by Border Patrol Agents in the English language to state his citizenship. SUBJECT stated he was a citizen of India and freely admitted to being illegally present in the United States. At this time SUBJECT was placed under arrest and transported to the Carrizo Springs Border Patrol Station for further processing.</p>		
<p>ADVISAL OF RIGHTS/JURAT I-867A: At the Border Patrol Station, SUBJECT was advised of his rights as per form I-867A in the Punjabi, Language interpreted by Language Line Services representative Juliet #1575. SUBJECT stated he understood his rights and that he was willing to answer questions.</p>		
<p>ALIENAGE/TRAVEL DATA: SUBJECT departed his hometown in Patiala, Punjab, India sometime in October of 2010. SUBJECT flew from New Delhi, India to Sao Paulo, Brazil on Qatar Airlines. From Saul Paulo, Brazil he flew to Lima, Peru on Daca Airlines and from there he flew to Quito, Ecuador. From Ecuador he flew to Guatemala City, Guatemala on Daca Airlines. Subject claims to have reached Guatemala City on or about November 1st. Subject stayed in a hotel for six to seven days. On or about November 7th, subject claims to have reached Tapachula, Mexico via bus. Subject claims to have traveled alone to the Mexico/Guatemala Border. An unknown person took the subject and some other individuals whom he had met from Guatemala, to his personal house in Tapachula, Mexico before sending them to the Madrid Hotel in Tapachula, Mexico. The subject left Tapachula, Mexico with a smuggler named "Donker" who blindfolded them, and took them by vehicle to Mexico City, Mexico. The subject stayed in Mexico City, Mexico for two to three days before departing on a bus to Nuevo Laredo, Tamaulipas, Mexico. When arriving to Nuevo Laredo, Tamaulipas, Mexico, the subject was taken to a brick house near a railroad track, where he and other individuals stayed for two to three days before the smugglers came back. When the smugglers arrived, they were taken to the bus station in Nuevo Laredo, Tamaulipas, Mexico and driven north to an unknown location near the US/Mexico border. Subject was dropped off and walked to the river to cross into the United States. Subject claims that there were a total of 14 individuals at the river who crossed into the US with him. Subject illegally crossed the Rio Grande River into the United States approximately 41 miles northwest of the Laredo Colombia Bridge Port of Entry in Laredo, Texas at a place not designated as a port of entry by the Attorney General or the Commissioner of the Department of Homeland Security. Subject stated the he walked through the brush along with fourteen other individuals for approximately three days before being told to get into a truck near an unknown location. Subject stated that he was in the vehicle for approximately 10 minutes before being apprehended by the Border Patrol on 12/22/2010 at approximately 2000 HRS. Subject was apprehended along with 9 other individuals. The subject claims to have traveled from India to Ecuador alone and without meeting a smuggler. He claims to have met a Smuggler named LEO in Tapachula, Mexico. The subject paid the smuggler \$1000.00 US dollars to be smuggled to Houston, Texas. From there, the subject was to pay \$3000.00 US dollars to get some documents to work and live in the United States.</p>		
Signature  ERIC FLORES	Title BORDER PATROL AGENT	

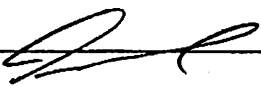
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000327 176
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Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
<p>IMMIGRATION HISTORY: SUBJECT came back negative in IAFIS and IDENT.</p> <p>CRIMINAL HISTORY: Records checks were performed through Del Rio Sector Communications (KAK-920) and came back with negative results.</p> <p>SUBJECT was extensively interviewed and claims no gang or terrorist affiliations or ties.</p> <p>SUBJECT has no wants or warrants pending. <u>EF</u></p> <p>ADMINISTRATIVE PROCESSING: SUBJECT freely admitted that he illegally entered the United States by crossing the Rio Grande River approximately 41 miles northwest of the Laredo Colombia Bridge Port of Entry in Laredo, Texas and was not inspected by an Immigration Official, and was not admitted legally by the Attorney General of the United States or the Commissioner of the Department of Homeland Security.</p> <p>SUBJECT is inadmissible pursuant to Section 235 (b) (1) of the Immigration and Nationality Act (Act), 8 U.S.C. 1225 (b) (1), the Department of Homeland Security has determined that he is inadmissible to the United States under Section 212 (a) (7) (A) (i) (I) of the Act, as amended, and therefore is subject to removal, in that: he is an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act.</p> <p>SUBJECT states that he has no petitions filed on his behalf.</p> <p>Service Forms I-860 and I-296 were prepared and served on the SUBJECT.</p> <p>CONSULAR NOTIFICATION: SUBJECT was advised of, and declined, his right to speak with the Consulate of India. The India Consulate Office was contacted via fax as to the apprehension of SUBJECT.</p> <p><input checked="" type="checkbox"/> CREDIBLE FEAR/HEALTH: SUBJECT appears to be in good health and has no claims of any health issues.</p> <p><input checked="" type="checkbox"/> SUBJECT claims that his life would be in danger if he is returned back to his native country of India. Subject claims he has been persecuted in India due to his religious beliefs. <u>EF</u> After extensive questioning, the subject appears to be an Indian Punjabi Sikh.</p> <p>PROPERTY/MONEY: SUBJECT was in possession of \$0.00 US Dollars. SUBJECT has property tagged with tag#435523. <u>EF</u></p> <p>Richard Gratkowski of ICE and Ben Ponce De Leon of Carrizo Springs Intelligence</p>		
Signature  ERIC FLORES	Title BORDER PATROL AGENT	

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000328 177
 12/26

Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
<p>interviewed all subjects involved in the vehicle load. BIC and JTTF were notified of the Special Interest Aliens. Jade Woodruff of the JTTF was contacted, ran record checks on all individuals and declined to respond.</p> <p>NTC Log #848115.</p> <p>DISPOSTION: SUBJECT is being processed for 8 U.S.C. 1182/Expedited Removal. Subject was not prosecuted as per Del Rio Sector Prosecution guidelines due to the fact he entered the United States through the Laredo Sector Area of Operation. Subject was advised that he may not return to the United States for a period of 5 years, and if he does he will be subject to a Reinstatement of a Prior Order of Removal. Subject will be placed on an I-203 and will be transferred to a Geo facility pending his removal by the Office of Detention and Removal Personnel. The File was sent to Del Rio Prosecutions.</p>		
Signature  ERIC FLORES	Title BORDER PATROL AGENT	

(56)

000329 178
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Exhibit 31

Record of Sworn Statement in Proceedings
under Section 235(b)(1) of the Act

U.S. Department of Homeland Security

Office: CARRIZO SPRINGS, TX, BORDER PATROL STATION

File No: A200 893 771
Event No: CAR1112000069

Statement by: DALJIT SINGH

In the case of: DALJIT SINGH

Date of Birth: 04/18/1981

Gender (circle one): Male Female

At: CARRIZO SPRINGS, TX, BORDER PATROL STATION Date: December 23, 2010

Before: ERIC FLORES

BORDER PATROL AGENT

(Name and Title)

In the PUNJABI language. Interpreter Juliet # 1575 Employed by LANGUAGE LINE SERVICES

I am an officer of the United States Department of Homeland Security. I am authorized to administer the immigration laws and to take sworn statements. I want to take your sworn statement regarding your application for admission to the United States. Before I take your statement, I also want to explain your rights, and the purpose and consequences of this interview.

You do not appear to be admissible or to have the required legal papers authorizing your admission to the United States. This may result in your being denied admission and immediately returned to your home country without a hearing. If a decision is made to refuse your admission into the United States, you may be immediately removed from this country, and if so, you may be barred from reentry for a period of 5 years or longer.

This may be your only opportunity to present information to me and the Department of Homeland Security to make a decision. It is very important that you tell me the truth. If you lie or give misinformation, you may be subject to criminal or civil penalties, or barred from receiving immigration benefits or relief now or in the future.

Except as I will explain to you, you are not entitled to a hearing or review.

U.S. law provides protection to certain persons who face persecution, harm or torture upon return to their home country. If you fear or have a concern about being removed from the United States or about being sent home, you should tell me so during this interview because you may not have another chance. You will have the opportunity to speak privately and confidentially to another officer about your fear or concern. That officer will determine if you should remain in the United States and not be removed because of that fear.

Until a decision is reached in your case, you will remain in the custody of the Department of Homeland Security.

Any statement you make may be used against you in this or any subsequent administrative proceeding.

Q. Do you understand what I've said to you?

A. Yes.

Q. Do you have any questions?

A. No.

Q. Are you willing to answer my questions at this time?

A. Yes.

Q. Do you swear or affirm that all statements you are about to make are true and complete?

A. Absolutely.

Q. What is your complete and correct name?

A. Daljit Singh.

Q. Have you ever used any other names?

A. No, never.

Q. When and where were you born?

... (CONTINUED ON I-831)

Page 1 of 3

x Daljit Singh

I-867A (08/01/07)

(57)

000331 180
[Signature]

Alien's Name DALJIT SINGH	File Number A200 893 771 Event No: CAR1112000069	Date December 23, 2010
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A. I was born on April 18, 1981 in Patiala, Punjab, India.
 Q. Of what country are you a citizen?
 A. India.
 Q. Of what country are your parents citizens?
 A. India.
 Q. Do you have any documents issued by any legal authority that permits you to enter, live, or work in the United States?
 A. No.
 Q. Have your Parents ever resided in the United States?
 A. No.
 Q. Do you have any claim to being a citizen of the United States?
 A. No.
 Q. Do you have any United States immigration Petitions pending on your behalf?
 A. No.
 Q. When did you last enter the United States?
 A. Three days ago.
 Q. How did you last enter the United States?
 A. Walking.
 Q. What was your purpose for your last entry into the United States?
 A. I came to claim political asylum.
 Q. Where were you going today?
 A. New York.
 Q. Have you ever resided here in the United States before?
 A. No.

Immigration pattern

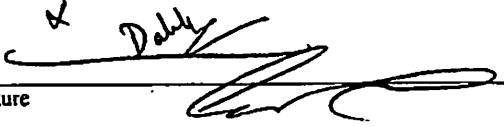
Q. When was the last time you entered the United States before this?
 A. I came for the first time.
Illicit Enterprise

Q. Have you ever been arrested by the police in the United States or any other country?
 A. I stated before, I was arrested in India by the police due to my religious affiliation, but released.
 Q. Have you ever been arrested, detained, deported or excluded by United States Immigration officers?
 A. No sir.


Consular Rights

Q. Do you wish to speak with a representative of your country?
 A. No.

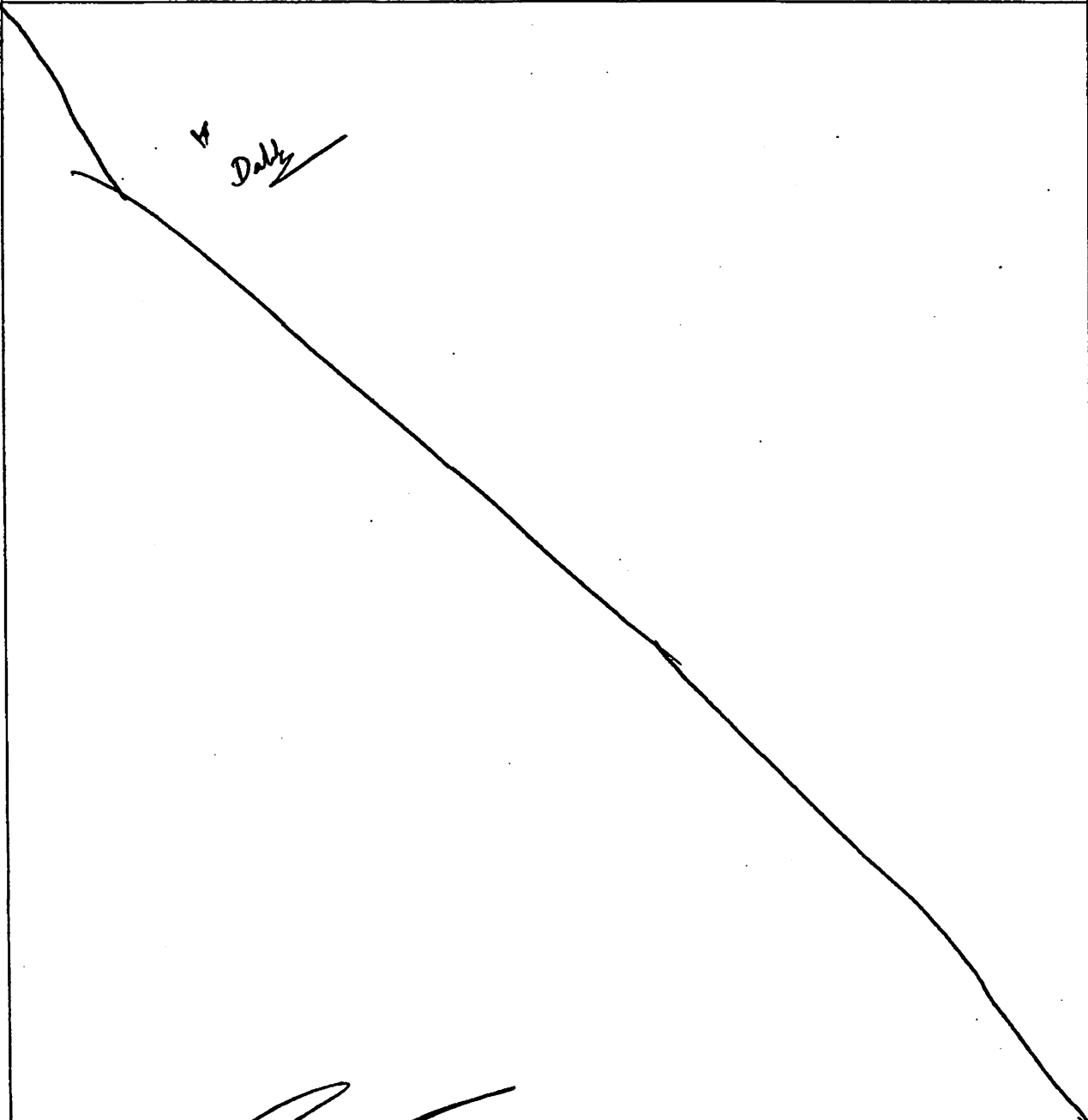
Q. Is there anything else you would like to say?
 A. Just that I want to stay here for political asylum.

Signature  ERIC FLORES	Title BORDER PATROL AGENT
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000332 181


Alien's Name DALJIT SINGH	File Number A200 893 771 Event No: CAR1112000069	Date December 23, 2010
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Signature  ERIC FLORES	Title BORDER PATROL AGENT
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Exhibit 32

**Jurat for Record of Sworn Statement in
Proceedings under Section 235(b)(1) of the Act**

U.S. Department of Homeland Security

Q: Why did you leave your home country or country of last residence?

A. TO SAVE MY LIFE.

✓ Daljit

Q. Do you have any fear or concern about being returned to your home country or being removed from the United States?

A. YES, BECAUSE THE OTHER RELIGIONS WANT TO KILL PEOPLE FROM MY RELIGION.

✓ Daljit

Q. Would you be harmed if you are returned to your home country or country of last residence?

A. YES.

✓ Daljit

Q. Do you have any question or is there anything else you would like to add?

A. NO.

✓ Daljit

I have read (or have had read to me) this statement, consisting of 1 pages (including this page). I state that my answers are true and correct to the best of my knowledge and that this statement is a full, true and correct record of my interrogation on the date indicated by the above named officer of the Department of Homeland Security. I have initialed each page of this statement (and the corrections noted on page(s) n/A).

Signature: DALJIT SINGH ✓ Daljit

Sworn and subscribed to before me at CARRIZO SPRINGS, TX, BORDER PATROL STATION
on December 23, 2010.

ERIC FLORES
BORDER PATROL AGENT

Signature of Immigration Officer

Witnessed by: BPA J. RUIZ

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#03

Exhibit 33

HUMAN
RIGHTS
WATCH



WORLD REPORT | 2013
EVENTS OF 2012

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5/18
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India

India, the world's most populous democracy, continues to have significant human rights problems despite making commitments to tackle some of the most prevalent abuses. The country has a thriving civil society, free media, and an independent judiciary. But longstanding abusive practices, corruption, and lack of accountability for perpetrators foster human rights violations.

Government initiatives, including police reform and improved access to health care and education, languish due to poor implementation. Many women, children, Dalits (so-called untouchables), tribal communities, religious minorities, people with disabilities, and sexual and gender minorities remain marginalized and continue to suffer discrimination because of government failure to train public officials in stopping discriminatory behavior.

Impunity remains a serious problem, particularly for abuses committed by security forces in Jammu and Kashmir, the northeast, and areas in central and eastern India facing a Maoist insurgency. Resource extraction and infrastructure projects often have deleterious environmental and economic impacts, and may infringe upon the rights of affected communities.

The central government tightened restrictions on internet content, insisting the measures are to contain threats to public order. It used a colonial-era sedition law to stifle peaceful dissent in 2012 on issues ranging from the government's handling of the Maoist insurgency and corruption, to protests against a nuclear power plant in the southern state of Tamil Nadu. The protection of religious minorities received a boost from the prosecutions of several suspects in the 2002 Gujarat riots, resulting in over 75 convictions in 2012. These included the August conviction of Maya Kodnani, a former minister and a leader of Bajrang Dal, a militant Hindu organization.

Impunity

Members of security forces implicated in serious rights abuses continued to enjoy impunity, in large measure due to India's laws and policies.

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The Indian defense establishment resisted attempts in 2012 to revoke or revise the Armed Forces Special Powers Act (AFSPA), which permits soldiers to commit serious human rights violations with effective immunity.

Maoist Insurgency

Maoists operations extend to nine states in central and eastern India, finding support in regions with weak governance, infrastructure and basic public services, such as health care and education.

Maoist insurgents known as Naxalites continued to target government schools and hospitals. Paramilitary forces continued to occupy and use schools as bases, despite a Supreme Court order to vacate all schools by May 2011. In September, government officials in Chhattisgarh, central India, stated they would remove forces from 36 schools and hostels because of their impact on children's education.

At this writing, Maoist-related violence in 2012 had resulted in 257 deaths, including 98 civilians. In June, security forces killed 19 villagers in Chhattisgarh state in a night operation, prompting widespread condemnation.

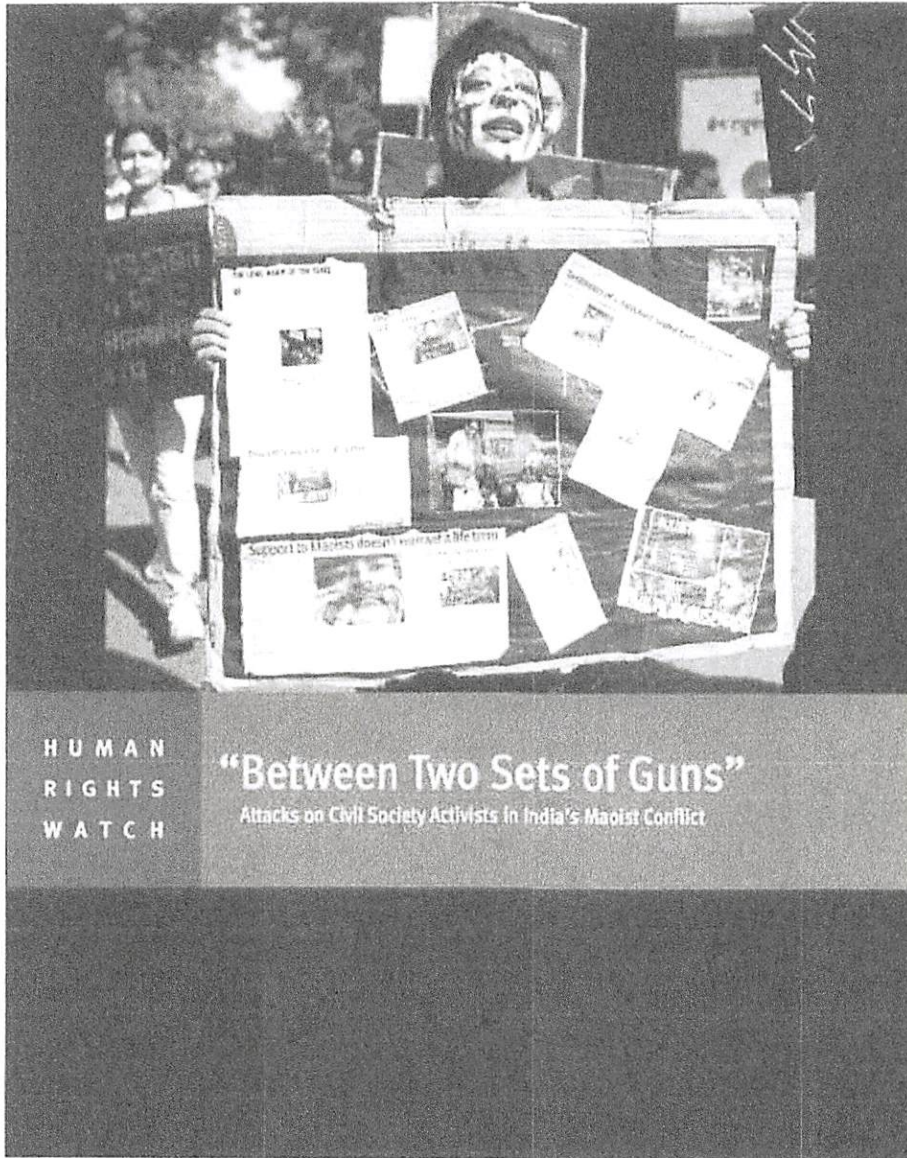
Civil society activists in Maoist areas remain increasingly at risk from both Maoists and state security forces. Many activists have been arbitrarily arrested, tortured, and charged with politically motivated offenses that include murder, conspiracy, and sedition. The Maoists have threatened or attacked activists they believe are linked to the government.

Jammu and Kashmir

While violence in the northern state of Jammu and Kashmir has been on a decline, security forces responsible for serious rights abuses remain effectively immune from prosecution under the AFSPA.

In September, the state government rejected calls for DNA testing of 2,730 corpses that a police investigative team found in unmarked graves at 38 sites in north Kashmir in July 2011. Some of the gravesites are believed to hold victims

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HUMAN
RIGHTS
WATCH

“Between Two Sets of Guns”

Attacks on Civil Society Activists in India's Maoist Conflict

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of enforced disappearance and extrajudicial execution by government security forces dating back to the 1990s.

A number of elected village council leaders resigned in September following threats and attacks from armed separatist militants who oppose any election in Jammu and Kashmir.

Violence in Assam

In July, violence between indigenous Bodo tribes and Muslim migrant settlers started in Kokrajhar and spread to several districts in Assam, resulting in the deaths of at least 97 people and displacing over 450,000. Authorities in Assam failed to prevent the violence, despite information about increasing tensions between the communities, which have clashed in the past over access to land and resources.

Freedom of Expression

In 2012, the central government used the Information Technology (Intermediary Guidelines) Rules to tighten internet censorship, raising concerns about restrictions on the right to free speech. Under the rules, intermediaries such as internet service providers and search engines are required to remove content within 36 hours that is deemed offensive. However, criteria for prohibited content are ambiguous and frequently used to stifle criticism of the government.

The government used the colonial-era sedition law without regard for a Supreme Court ruling that sedition requires evidence of incitement. In September, police in Mumbai arrested political cartoonist Aseem Trivedi, acting on a complaint that his cartoons mocked the Indian constitution and the national emblem. He was released after widespread protests. In May, in the southern state of Tamil Nadu, police filed sedition complaints against thousands of people who peacefully protested the construction of a nuclear power plant. In Orissa and Chhattisgarh states, sedition cases have been filed against activists and lawyers suspected of supporting armed Maoist groups.

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The government continued to use the Foreign Contributions Regulation Act (FCRA) to restrict access to foreign assistance by domestic nongovernmental organizations.

Protection of Children's Rights

Children remained at risk of abuse, with a large number forced into dangerous forms of labor, and without proper access to health care and education.

India has one of the largest populations of malnourished children in the world. According to government estimates, at least 40 percent of children are vulnerable to sex trafficking, homelessness, forced labor, drug abuse, and crime—and need protection.

The government took some significant steps in 2012 to improve children's rights. In April, the Supreme Court upheld the government decision to provide universal access to primary education, requiring that private schools reserve 25 percent of seats for underprivileged children. In May, parliament passed a new law to protect children from sexual abuse. In August, the government issued a blanket ban on employing children under 14, reversing a former law that only prohibited employment in hazardous jobs.

Women's Rights

Violence against women and girls continued in 2012, with increased reports of sexual assault, including against those with disabilities. The government had yet to properly investigate and prosecute sexual abuse in police custody.

In June 2012, Pinki Pramanik, a renowned woman athlete, was arrested on allegations of rape. Male police officers mistreated her while taking her into custody and authorities conducted "gender determination" tests in violation of her rights to consent, privacy, and dignity. A video of her undergoing some part of the abusive examination was made public.

India has yet to enact amendments to reform its penal laws to recognize a wide range of sexual offenses. While the central government modified its protocols for handling rape investigations, removing questions on the degrading "two-fin-

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ger test," the changes still fall short of World Health Organization (WHO) guidelines on sexual assault, especially regarding medical treatment for victims.

India has a strong law to curb child marriages but the government also pursues discriminatory policies. In central India's Madhya Pradesh state, for example, adult candidates are barred from taking state civil service exams if they were forced to marry as children. The government continued to limit its nutrition programs for pregnant mothers in many states to women ages 19 and older, and up to two live births only, excluding many young mothers from benefits.

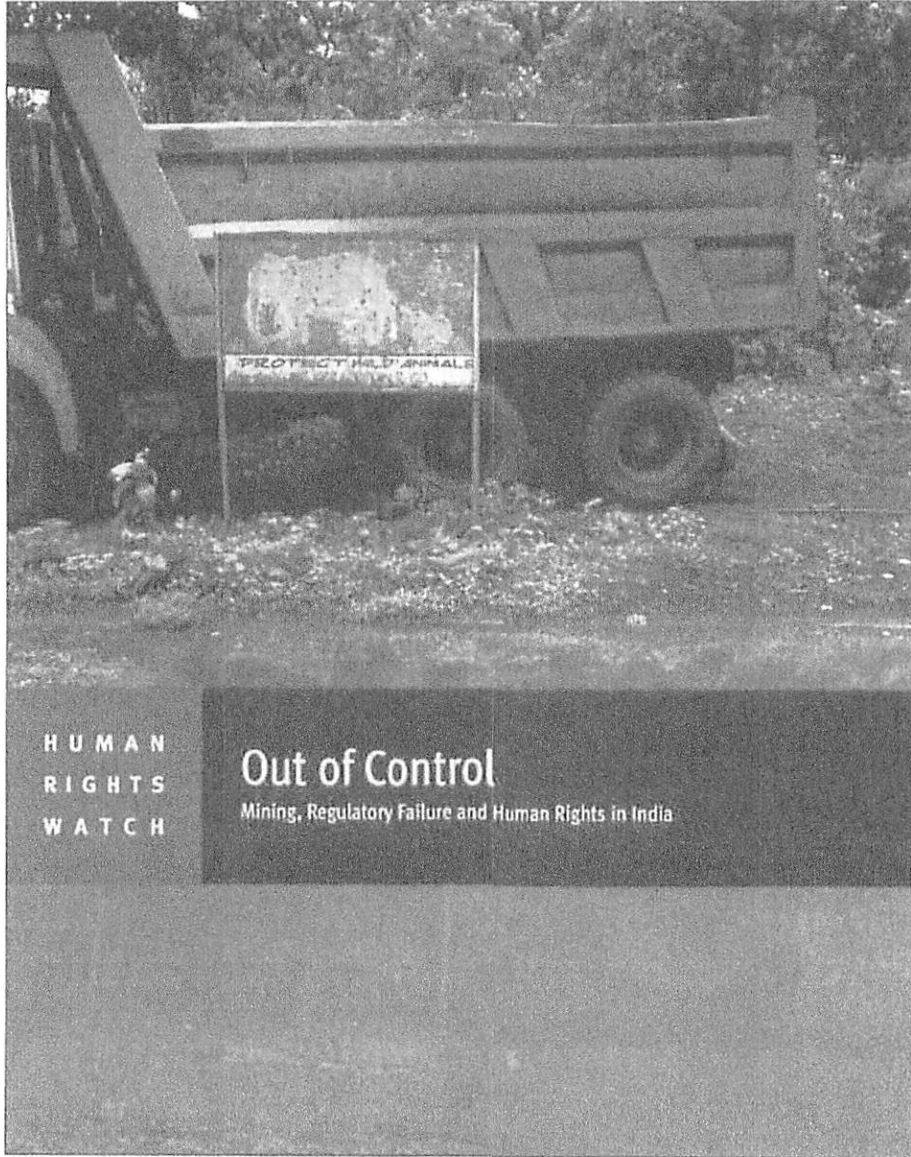
Abuses in Extractive Industry

A breakdown in government oversight over India's mining sector has led to rampant corruption and, in some cases, to serious harm to health, environments, and livelihoods of mining-affected communities.

In September, the government of the western state of Goa canceled all mining licenses to examine whether proper procedures were followed to mitigate the negative impact on health and environment. The same month, after a year-long suspension, mining activity was allowed to partially resume in the southern Karnataka state, on condition that no environmental restrictions are violated. However, the government failed to enforce protection mechanisms in other parts of the country.

Access to Palliative Care

The Indian government took several important steps in 2012 to address the suffering of hundreds of thousands of persons with incurable diseases from pain and other symptoms. It has begun to actively encourage regional cancer centers, many of which do not currently offer palliative care, to ensure such services become available. The government is also preparing amendments to the Narcotic Drugs and Psychotropic Substances Act, which, if adopted, would improve the medical availability of morphine. More than seven million people in India require palliative care every year.



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Death Penalty

In November, India hanged Ajmal Kasab, the only surviving Pakistani gunman from the November 2008 Mumbai attacks in which 10 members of the Lashkar-e-Taiba Pakistan-based terrorist group killed more than 160 people. It was the first execution in India since 2004, ending an eight-year unofficial moratorium.

India maintains that it imposes capital punishment in only the “rarest of rare” cases. In July, 14 retired judges asked the president to commute the death sentences of 13 inmates erroneously upheld by the Supreme Court over the past nine years. This followed the court’s admission that these death sentences were rendered *per incuriam* (out of error or ignorance). In November, the Supreme Court also conceded that the “rarest of rare” standard has not been applied uniformly over the years and that the principles for judging what constitutes “rarest of rare” crimes need “a fresh look.”

International Role

India’s foreign policy in the region continues to be influenced by strategic and economic concerns about China’s growing influence in Burma, Nepal, Pakistan, and Sri Lanka.

India took some positive steps toward promoting human rights and accountability globally. In March, India voted for a United States-led resolution at the United Nations Human Rights Council (HRC) calling for post-war reconciliation and accountability in Sri Lanka. This marked a significant change of position by India, which has traditionally refrained from publicly criticizing the Sri Lankan government on well-documented war crimes and related abuses.

In February, India voted in favor of a UN Security Council resolution on Syria backing an Arab League plan concerning the escalating violence there. In July, India again voted with Western governments at the Security Council in favor of a resolution on Syria, which if adopted, would have extended the mandate of the United Nations Supervision Mission in Syria (UNSMIS) and threatened sanctions if demands that Syrian authorities end abuses were not met.

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Key International Actors

India has traditionally followed a foreign policy based on the principle of non-interference and deems any criticism on human rights issues as interference in its domestic affairs. As a result, most countries, including the US and the European Union (EU), prefer to discuss these issues with India in private rather than publicly press it to improve its rights record.

However, in May, several UN member states made significant recommendations during the UN Universal Periodic Review (UPR) of India's human rights record. Recommendations included calls for India to ratify international treaties against torture and enforced disappearance, repeal the death penalty as well as the much-abused AFSPA, and protect the rights of Dalits, religious minorities, women, children, and tribal groups. The Indian government has responded by committing to address some of the recommendations, but ignored those that required substantive action against impunity.

India invited the UN special rapporteur on extrajudicial, summary, or arbitrary executions, and the UN special rapporteur on the sale of children, child pornography, and child prostitution to visit the country. After his visit in March, Christof Heyns, the special rapporteur on extrajudicial, summary, or arbitrary executions, expressed concerns over "high levels of impunity" enjoyed by police and armed forces, recommended that the AFSPA be repealed, and called for establishing a commission of inquiry to investigate extrajudicial killings.

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Exhibit 34



India: Punjab Case Shows Need for Anti-Torture Law ^[1]

Torture and Ill-Treatment Raises Bar to Extraditions

September 27, 2012

(New Delhi) – The alleged mistreatment of a suspected Sikh separatist in Punjab highlights the widespread use of torture by Indian security forces, which may prevent foreign extraditions to India, Human Rights Watch said today. The Indian parliament should promptly enact the Prevention of Torture bill and the government should take immediate steps to implement its provisions, including ending all torture and ill-treatment by security forces and prosecuting those responsible.

Human Rights Watch called for an investigation into allegations that the Punjab police tortured Kulvir Singh Barapind after his September 20, 2012, arrest on charges of waging war on the state, possession of explosives, and sedition. His lawyer told Human Rights Watch that Barapind had complained to the magistrate that the police “applied electric shocks to his ears, beat him, and humiliated him.” The United States had extradited Barapind to India on June 17, 2006, on murder charges after obtaining assurances from India that he would not be tortured. A court in India subsequently acquitted Barapind of all charges and released him in April 2008.

“Indian authorities seldom deny that torture is a problem, but their failure to ensure the safety of someone in a high-profile international case shows how extensive it is,” said Meenakshi Ganguly ^[2], South Asia director at Human Rights Watch. “This case spotlights the urgency for India to enact the Prevention of Torture bill and put its provisions into immediate effect.”

Foreign governments need to take into account India’s poor record on torture in assessing whether to extradite individuals to the country, Human Rights Watch said. International law prevents governments from returning any person, including criminal suspects, to a country where they are likely to face torture or other ill-treatment. The Convention against Torture states that countries making such a determination “shall take into account all relevant considerations, including...the existence in the State concerned of a consistent pattern of gross, flagrant or mass violations of human rights.”

In June 2012 a court in Denmark stopped the extradition of Danish national Niels Holck, known as Kim Davy in India, who was sought by India for smuggling weapons to a militant group in West Bengal in 1995. The Danish government had accepted India's request for extradition in 2010, but Danish courts eventually ruled that Holck said that he was at risk of torture and mistreatment in India.

During India's Universal Periodic Review at the United Nations Human Rights Council in May 2012, several countries recommended that India enact legislation specifically prohibiting torture and ratify the Convention against Torture.

"Human rights groups have long documented the widespread use of torture to extract confessions, identify criminals, and often to simply punish suspects in custody by assuming their guilt," Ganguly said. "But the recent UN review of India's rights record made clear that governments are also deeply concerned about pervasive torture."

In two reports, "Broken System,"^[3] documenting the urgent need for police reforms, and "The Anti-Nationals,"^[4] on violations during India's counterterrorism operations, Human Rights Watch found evidence of widespread use of torture throughout India. Police admitted that without proper training and equipment to gather evidence, and under pressure to solve crimes, an overworked force frequently uses torture as the tool most readily available to them. Many admitted that coerced confessions and information also misled inquiries, allowing criminals to escape and innocent individuals to be arrested.

Human Rights Watch has also extensively documented allegations of torture in Punjab, Manipur, and Jammu and Kashmir, by both the army and police. Border residents in the Indo-Bangladesh border are also subjected to torture by the Border Security Force. In operations against Maoist insurgents, government forces, including the police and central government paramilitary, have engaged in arbitrary arrests and torture of ordinary villagers in an effort to extract information about insurgents hiding in the jungles. Security forces often use electric shock, crushing of limbs, pulling of fingernails, severe beatings, and threats of violence against family members to punish suspects and extract information.

Human Rights Watch called on the Indian government to ratify the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, and to enact the Prevention of Torture bill, which is currently awaiting cabinet approval before it is voted on by

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the Rajya Sabha, the upper house of parliament. The law should override all provisions of Indian law that allow government officials immunity from prosecution for human rights violations. It should also ensure that adequate time is given for victims to be able to file complaints, and that all forms of inhuman and degrading treatment are brought under the purview of the law.

“Torture is routine in India’s police stations, but that practice is exacerbated in situations of conflict,” Ganguly said. “Barapind’s case gives the Indian government a high-profile reminder to take action against the chronic problem of torture in custody.”

Source URL: <http://www.hrw.org/news/2012/09/27/india-punjab-case-shows-need-anti-torture-law>

Links:

[1] <http://www.hrw.org/news/2012/09/27/india-punjab-case-shows-need-anti-torture-law>

[2] <http://www.hrw.org/bios/meenakshi-ganguly>

[3] <http://www.hrw.org/reports/2009/08/04/broken-system>

[4] <http://www.hrw.org/reports/2011/02/01/anti-nationals-o>

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Exhibit 35



JANUARY 2015

COUNTRY SUMMARY

India

India elected a new government in May 2014 led by Narendra Modi of the Bharatiya Janata Party (BJP) as prime minister. After 10 years in opposition, the BJP won a decisive mandate with a significant majority in parliament. The BJP promised to revive growth, end corruption, and pursue development projects.

Modi has stressed protection of women from violence and other abuses, and access to healthcare and sanitation. He has urged members of parliament to establish model villages with better infrastructure and modern sanitation facilities in rural areas, and, in his first public speech, called for a decade-long moratorium on communal divisions and discrimination.

The new government has expressed a commitment to freedom of speech but has not ended state censorship or taken decisive action against ultranationalist and other religious militant groups that respond to views they do not like with threats of violence. In 2014, authorities tightened restrictions on nongovernmental organizations (NGOs). One reason for this has been that civil society groups have been highly critical of big development projects that they say will have a negative impact on the environment, and on the health and livelihoods of affected populations.

While Modi took office with a reputation for having overseen economic growth and improved governance as chief minister of Gujarat, his inability to protect Gujarati Muslims during religious riots in 2002 and promptly prosecute perpetrators continues to cause concern. Some inflammatory remarks by BJP politicians have added to a sense of insecurity among religious minorities.

Caste-based discrimination and neglect of tribal communities is also a continuing problem in India, as is sexual abuse and other violence against women and children. The awarding of the 2014 Nobel Peace Prize to activist Kailash Satyarthi spotlighted the fact that millions of children in India are still engaged in the worst forms of labor. Lack of accountability for security forces and public officials responsible for abuses perpetuates impunity and leads

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to further abuses. Police reforms are urgently needed to make the force rights-respecting and accountable.

Treatment of Minorities

Incidents of violence against religious minorities spiked in 2013 in the run-up to national elections; according to government sources 133 people were killed and 2,269 injured in 823 incidents.

More than a year after communal violence killed over 60 people, mostly Muslims, and displaced tens of thousands in Muzaffarnagar and Shamli districts of Uttar Pradesh state, both the central and the state governments had not provided proper relief or justice. The BJP even chose Sanjeev Balyan, charged with inciting violence during the riots, as their candidate in parliamentary elections and appointed him as a minister, intensifying Muslim insecurities. The state government forcibly closed down relief camps and failed to act on allegations that lack of adequate relief services caused the death of over 30 children in the camps.

In June 2014, an ultranationalist Hindu group organized violent protests in the western city of Pune against a social media post derogatory to some Hindu historical and political figures. Some members of the group, assuming that the anonymous post was the work of Muslims, arbitrarily beat and killed Mohsin Shaikh—who had no links to post—but was easily identified as Muslim because of his prayer cap.

Dalits (so-called Untouchables) and tribal groups continued to face discrimination and violence. The difficulties the Dalit community has in obtaining justice were highlighted by recent court verdicts in four cases in Bihar and one in Andhra Pradesh states. In each of the cases, the courts overturned convictions in high-profile incidents that took place between 1991 and 2000 involving killings of Dalits due to lack of evidence, highlighting the failure of prosecutorial authorities.

Despite numerous initiatives and laws prohibiting “manual scavenging”—the cleaning by hand of human waste by members of communities considered low-caste—the practice persists. Those who try to leave such work face retribution, including threats of violence or displacement. In March 2014, the Supreme Court held that India’s constitution requires state intervention to end the practice.

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Impunity

Members of India's security forces continue to enjoy impunity for serious human rights violations.

In a rare case in November 2014, the army reported that a military court had sentenced five soldiers, including two officers, to life in prison for a 2010 extrajudicial execution of three innocent villagers. The army ordered a military trial after using the draconian Armed Forces Special Powers Act (AFSPA) to block prosecution by civilian courts.

The army also chose a military trial for the alleged March 2000 extrajudicial killing of five civilians in Pathribal in northern Jammu and Kashmir state. However, in January, the army court of inquiry dismissed charges against five officers. AFSPA, which has been in force for decades in Jammu and Kashmir and India's northeastern states, has provided effective immunity to members of the armed forces for killings of civilians and other serious human rights violations. Numerous independent commissions in India have recommended repealing or amending the law but the government has failed to do so in the face of stiff opposition from the army.

Proposed police reforms have also languished even as police continue to commit human rights violations with impunity. These include arbitrary arrest and detention, torture, and extrajudicial killings. In several states, police are poorly trained and face huge caseloads.

Two separate reports—one by a think tank and another by three senior police officials—found a deficit of trust between Muslim communities and the police. Muslims perceive the police to be communal, biased, and insensitive in part because of the misconduct of some police personnel, especially during communal tensions.

Women's Rights

In November 2014, more than a dozen women died and many others were critically ill after undergoing sterilization procedures in the central Indian state of Chhattisgarh. This led to an outcry against target-driven approaches to family planning programs.

Legal reforms were introduced in response to the 2012 Delhi gang-rape and murder, but at time of writing the Indian government had yet to introduce monitoring and reporting mechanisms to track their implementation. Reports of rape—including of Dalit women,

individuals with disabilities, and children—continued to make national news in 2014, leading to protests.

In early 2014, the government introduced guidelines for the medical treatment and examination of women and children who report rape, but failed to allocate resources necessary for their implementation. At time of writing only two states had adopted the guidelines.

Maternal mortality rates have declined in India but remain a concern because of weak referral systems and poor access to medical assistance in many parts of the country.

Children's Rights

By awarding its peace prize to Kailash Satyarthi, the Nobel committee drew attention to the continuing employment of children in the worst of labor. The Right to Education Act and government schemes have resulted in near-universal enrollment of children in early grades. But millions of children, particularly from vulnerable Dalit, tribal, and Muslim communities, facing discrimination, inadequate support in government schools, and pressures to earn money, soon drop out and start working.

In August 2014, the government introduced amendments to the Juvenile Justice Act that, if adopted, would subject 16-18 year olds to prosecution in adult courts when charged with serious crimes such as rape and murder. Child rights activists and the National Commission for Protection of Child Rights strongly opposed the amendments.

In June 2014, the United Nations Committee on the Rights of the Child identified several areas in which the Indian government had failed to ensure protection of children from discrimination, harmful practices, sexual abuse, and child labor. It also raised concerns about Maoist militants recruiting children and attacking schools, and about government armed forces occupying schools in Maoist-affected areas despite Supreme Court rulings prohibiting the practice.

Protection of LGBT Rights

The rights of Lesbian, Gay, Bisexual, and Transgender (LGBT) people suffered a setback in December 2013 when the Supreme Court reversed a landmark 2009 Delhi High Court decision striking down a colonial-era law criminalizing adult consensual same-sex

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2013

relations. At time of writing, a petition to review the decision was pending before the Supreme Court.

In April 2014, the Supreme Court recognized transgender individuals as a third gender and asked the government to treat them as a minority eligible for quotas in jobs and education.

Palliative Care

In February 2014, India's parliament amended the country's drug laws to allow for better access to pain medicines including morphine. The crucial amendments to the Narcotic Drugs and Psychotropic Substances Act eliminated archaic rules that obligated hospitals and pharmacies to obtain four or five licenses, each from a different government agency, every time they wanted to purchase strong pain medicines. More than 7 million people in India require palliative care every year and the new revisions to the law will help spare them the indignity of suffering needlessly from severe pain.

Rights of Persons with Disabilities

Mental health and support services are severely lacking in India. Fewer than 20 percent of the people who need mental health care have access to treatment. Due to stigma and the shortage of government community-based services, families find it difficult to cope and often end up abandoning or forcibly institutionalizing relatives with intellectual or psychosocial disabilities.

Restrictions on Free Speech

Vaguely worded laws that criminalize free speech continue to be misused. Police in various states have filed charges under the Indian Penal Code or the Information Technology Act for online comments critical of important political figures, including the prime minister. In one instance, five young men were questioned by the police for sharing anti-Modi comments over the phone. The police also targeted student magazines in two instances for critical comments on some political figures, including Modi.

Despite commitments to protect freedom of speech, the government has not taken decisive action against militant groups that threaten and attack people over views they do not like. In the face of weak government responses and threats of lawsuits from Hindu ultranationalist groups, a few publishers withdrew or cancelled books being prepared for publication.

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2014

Civil Society and Freedom of Association

Authorities have tightened restrictions on civil society organizations. Officials use the Foreign Contribution Regulation Act (FCRA), which tracks grants from foreign donors, to harass organizations that question or criticize government policies, to stymie their activities, and to cut off funds from abroad.

The impact on Indian civil society has been severe. When the Indian Home Ministry conducts an investigation pursuant to the FCRA, it often freezes the accounts of the NGO being investigated, cutting its source of funding, and forcing it to stop its activities. Such tactics have a wider chilling effect on the work of other groups.

In 2014, the Modi government asked the country's central bank to seek prior permission before moving foreign funds into Greenpeace India's accounts, intensifying concerns that the government would be less tolerant of organizations that questioned the government's development and infrastructure projects.

Death Penalty

While there were no executions in 2014, death sentences continued to be handed down. This was despite a Supreme Court decision in November 2012 stating that the "rarest of rare" case standard had not been applied uniformly over the years and needed review.

In a landmark judgment in January 2014, India's Supreme Court commuted the death sentences of 15 prisoners. It ruled that death penalty can be commuted where the defendants are mentally ill or where there are inexplicable government delays in deciding mercy pleas. It also set forth guidelines to safeguard the rights of prisoners on death row and their families.

Foreign Policy

The new government intensified engagement with world leaders to promote trade and investment and revive the Indian economy. Modi invited to his inauguration all neighboring heads of state, including Pakistan's, signifying his commitment to build stronger ties in the region.

Despite repeated militant attacks on Indian assets, including a May 2014 attack on the consulate in Herat, India continued to provide significant assistance to reconstruction efforts in Afghanistan and some training for Afghan security personnel. It has also provided assistance for reconstruction efforts in Sri Lanka.

Both the prior prime minister, Manmohan Singh, and now Modi's government have been reticent on many regional and global human rights issues where their voice could make a difference. The Modi government has focused on foreign policy to revive trade and investment, and called for international cooperation to counter terrorism threats and money laundering. However, it has not made any significant announcements suggesting greater commitment to protecting human rights even in countries like Bangladesh, Nepal, Sri Lanka, or Burma where it has considerable influence. It has abstained on key UN resolutions, including on North Korea in November 2014.

After supporting two resolutions at the UN Human Rights Council on Sri Lanka in 2012 and 2013, in March 2014 India abstained on a resolution requesting the Office of the High Commissioner for Human Rights to investigate serious violations during the conflict between the Sri Lankan government and the Liberation Tigers of Tamil Eelam that ended in May 2009. India said that Sri Lanka should instead be supported in addressing these concerns through wholly domestic efforts.

Human rights did not feature very strongly in public statements when Indian leaders met with counterparts from the United States, Australia, China, and Japan, although they agreed to cooperate on regional issues.

Although it has not ratified the UN refugee conventions, India continued to accept refugees from Tibet, Burma, and, in recent years, Afghanistan.

However, India failed to publicly condemn efforts by Australia to return Sri Lanka refugees without properly evaluating the risk of torture. Nor did India speak up to call for the protection of ethnic Rohingya Muslims in Burma.

Key International Actors

The US, United Kingdom, Japan, China, and Australia, among others, saw the election of Modi as an opportunity to strengthen trade ties with India. With the focus on investment and trade, and given longstanding Indian sensitivity to perceived intervention in its

domestic affairs, these countries maintained a low-key approach to human rights, choosing to ignore concerns about protection of religious minorities.

India's record on children's rights and women's rights were reviewed in 2014 by the UN Committee on the Rights of the Child and the UN Committee on the Elimination of Discrimination against Women. Both committees raised concerns about India's failure to implement relevant laws and policies and ensure non-discrimination.

Exhibit 36

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DRIVING LICENCE

DL No. 4414/1968
 Date 29/5/05
 Name DALJIT SINGH
 S/o, W/o, D/o S. MOHINDER SINGH
 Address 229, W. NO. 5, SANOUR,
DISTT. PATIALA. DOB 18-4-1981
 For SCOOTER, M. CYCLE, CAR ONLY.
 Is Licenced to Drive Throughout India Vehicle of the Above Description
 Issue Date 29/5/05
 Valid Upto 28/5/2010
 FORM OF RULE 16 (1) ISSUED BY THE LICENCING AUTHORITY PATIALA



ELECTION COMMISSION OF INDIA
IDENTITY CARD
 ਭਾਰਤ ਚੋਟ ਕਮਿਸ਼ਨ
 ਸਨਾਖਤੀ ਕਾਰਡ JTW2585065



ਚੋਟਕਾਰ ਦਾ ਨਾਂ : ਦਲਜੀਤ ਸਿੰਘ
 Elector's Name : DALJIT SINGH
 ਪਿਤਾ ਦਾ ਨਾਂ : ਮਹਿੰਦਰ ਸਿੰਘ
 Father's Name : MAHINDER SINGH
 ਲਿੰਗ / Sex : ਪੁਰਸ਼ / MALE
 1.1.2006 ਨੂੰ ਉਮਰ : 26 ਸਾਲ
 Age as on 1.1.2006 : 26 Years

ਲੜੀ ਨੰ. Sr. No. **977U 169892** ਰੋਲ ਨੰਬਰ Roll No. **B93902**



ਪੰਜਾਬ ਸਕੂਲ ਸਿੱਖਿਆ ਬੋਰਡ
Punjab School Education Board
 ਮੈਟ੍ਰਿਕੁਲੇਸ਼ਨ ਪਰੀਖਿਆ ਸਾਰਕ ਮਾਰਚ 1997
 Matriculation Examination, March 1997
 ਨਤੀਜਾ ਕਾਰਡ / DETAILED MARKS CARD

ਨਾਂ Name : ਦਲਜੀਤ ਸਿੰਘ
DALJIT SINGH
 ਪਿਤਾ ਦਾ ਨਾਂ Father's Name : ਮਹਿੰਦਰ ਸਿੰਘ
MOHINDER SINGH
 ਮਾਤਾ ਦਾ ਨਾਂ Mother's Name : ਮਨਜੀਤ ਕੌਰ
MANJIT KAUR
 ਜਨਮ ਮਿਤੀ / Date of Birth : 18/04/81
 ਨਤੀਜਾ / Result : ਪਾਸ

ਲੜੀ ਨੰ. Sr. No.	ਵਿਸ਼ਾ Subject	ਪ੍ਰਾਪਤ ਅੰਕ Marks Obt.	ਨਤੀਜਾ Result	ਕੁੱਲ ਅੰਕ Total Marks	ਪਾਸ ਅੰਕ Pass Marks
1.	ਪੰਜਾਬੀ / Punjabi (ਜਾਂ / or) ਪੰਜਾਬ ਦਾ ਇਤਿਹਾਸ ਅਤੇ ਸੱਭਿਆਚਾਰ Pb. History & Culture	078	ਪ	150	50
2.	ਅੰਗਰੇਜ਼ੀ / English	059	ਪ	100	33
3.	ਹਿੰਦੀ / Hindi	037	ਪ	100	33
4.	ਗਣਿਤ / Mathematics	023	ਦ	100	33
5.	ਸਾਇੰਸ / Science ਲਿਖਤੀ Theory 040 ਪ੍ਰਯੋਗੀ Practical 019	059	ਪ	75 } 100 25 }	22 } 33 7 }
6.	ਸਮਾਜਿਕ ਸਿੱਖਿਆ / Social Studies	059	ਪ	100	33
7.				100	33
ਕੁੱਲ ਅੰਕ / TOTAL MARKS		292		650	
ਦੇ ਸੋ ਫਾਨਲੇ					

ਵਿਸ਼ਾ / SUBJECT ਪ੍ਰਾਪਤ ਦਰਜਾ / GRADING
 1. ਐਸ. ਡੂ. ਪੀ. ਸੁਪਰਿਊ / SUPW ਕੀਪ A
 2. ਸਿਹਤ ਤੇ ਸਰੋਤਕ ਸਿੱਖਿਆ / Health & Physical Education A
 ਸਿਹਤ ਦਾ ਅਜੀਤ ਸਿੰਘ ਨਗਰ / S.A.S. Nagar
 ਤੀ / Date : 10 ਜੂਨ 1997 ਸਕੱਤਰ / SECRETARY

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Exhibit 37

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20th July 2009

Daljit Singh

Employee Code: 1015031

House No. 229, Ward No. 5,
Khansian Road, V.P.O. Sanour, Patiala.

Dear Daljit,

With reference to your application and your subsequent interview with us, we are pleased to offer you **probationary employment** as **Customer Service Supervisor** at **Patiala**, on the following terms and conditions:

Date of Joining: You have joined us on **20th July 2009**.

Place/Transfer: Your initial place of work will be in **Patiala**. However, your services are transferable to any place in the country within the Company or to any of its associates, or sister concerns, or its subsidiary at any place in India or abroad, whether existing today or which may come up in future at any time at the sole discretion of the Management. On such transfer you will be governed by the rules and regulations operating in the establishment to which you are posted.

Duties: A schedule of your broad duties and responsibilities will be given to you in due course. However, the company reserves the right to assign to you such other duties and responsibilities as may be considered advisable in the Company's interests. In your capacity as "**Customer Service Supervisor**" you will report to the **Store Manager** or to any other officer deputed by him.

Salary Structure: As per the sheet enclosed.

Salary and other perquisites/benefits, which have been distributed under the aforesaid heads, are subject to taxes, as applicable. At its sole discretion, the Management may consider either change of heads or redistribute the total emoluments under various heads. Your salary will also be governed by the Provident Fund, Gratuity, ESI Act and any other act as applicable from time to time as per the prevailing government rules.

The subject of compensation is confidential in nature and strictly between you and the Management. As a policy, you are expected to restrict the discussion / sharing of the same only with appropriate authority at all times viz. your Department Head or the designated officer in the HR function.



ADITYA BIRLA RETAIL LIMITED

DLF Info city Developers Chandigarh Limited, Tower-B, 2nd Floor, Plot No - 2, Chandigarh Technology Park, Near Village Kishangarh, Chandigarh - 160 101
Tel.: +91-172-6620006, Fax: +91-172-6620008

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Probation / Confirmation: You will be on probation for a period of **6 (six) months** on joining work. During the probation period your services can be terminated with seven days notice on either side and without any reasons whatsoever. If your services are found satisfactory during the probation period, you will be confirmed in the present position and thereafter your services can be terminated on one month's notice on either side.

Confirmation in the services of the company is subject to your performance and also you successfully completing all the qualifying requirements of any Certification Programmes, meant to train, evaluate your capabilities relevant to your position and business requirements during the period under review.

Unauthorized absence / Absence without intimation is a misconduct. Continuous absence for a period exceeding seven days without prior approval of your superior (including overstay on leave / training) would result in you losing your lien on the service and the same shall automatically come to an end without any notice or intimation. Unauthorized absence on more than one occasion shall attract termination of employment.

Code of Conduct: You are expected to abide by the Company's Code of Conduct a copy of which is enclosed herewith. You are expected read through Company's Code of Conduct document, seek clarifications, if any, and understand the spirit and implications.

Leave: You will be eligible to the benefits of the Company's Leave Rules on your confirmation in the Company's Service.

Uniform: Uniforms are deemed as Company property that facilitate team identity and brand building for our business. Unauthorized usage or usage of the uniform in places other than the Company's outlets and offices is strictly not permitted. Uniform during working hours shall be provided and/or prescribed. Uniform that is provided by the Company shall be against a refundable deposit of Rs.500/-. The deposit amount shall be deducted in equal installments from your first two salaries. **The deposit amount is not refundable if you resign from the services of the Company within 3 months.**

Traveling: In the course of your employment, you may be required to undertake traveling either in India or elsewhere in connection with the Company's business, according to the directions and instructions issued by the Management, from time to time, for which you will be reimbursed



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expenses in accordance with the rules. Refusal to undertake such travel may result in disciplinary action against you.

1. This offer is made to you subject to the following condition:

- a) All information that you come across in the course of discharging your duties with the Company which you would not have had access to but for your employment with us is strictly confidential. Any unauthorized disclosure of such information shall render your services liable to be terminated without notice and the Company shall be entitled to proceed against you for appropriate compensation / punitive action depending on the nature of such disclosure.
- b) As you are aware, you will have access to information, data, and records of the Company during the course of your employment from time to time. Disclosures of the same in any form, directly indirectly to any person, firm, corporation, organization or entity that competes with the business of the company, within a period of 2 years of the cessation of your employment with us, will entitle the company to initiate proceedings against you for suitable compensation / punitive actions besides pursuing all available legal recourse to prevent employment / contract / agreement / arrangement and such acts.
- c) You shall not, during your course of employment with us or anytime thereafter solicit or attempt to solicit the service of any employee of the Company nor shall you attempt to divert the efforts of any employee of the Company, by any means whatsoever, for your benefit or for the benefit of any person, firm, corporation, partnership or any other entity or organization directly or indirectly. In the event of you doing so, the Company shall be entitled to proceed against you for suitable compensation / punitive actions besides pursuing all available legal recourse to prevent such soliciting or attempt.
- d) You acknowledge and confirm that the conditions stated above are required on account of the facts and circumstances relevant to the business of the Company and hence reasonable.



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2. You will be required to work in shifts / break shifts. Your actual shifts and actual duty hours will be communicated to you from time to time.
3. You will be required to undergo training & trade tests from time to time. These will be integral to your job requirements, failing to undergo, complete, pass or get certified as per the process specified for the purpose, will attract review of your continuation in employment with the organization.
4. You shall not pledge the Company's credit and/or make representation unless you are specifically and duly authorized in that behalf.
5. The retirement age of the employees has been fixed by the Company at present at 55 years of age or thereafter on any date before you complete 55 years of age, if you are physically or mentally unable to perform your functions or your continuation in service would not be in the interest of the Company in its sole discretion.
6. You will abide by the Rules & Regulations / Standing Orders / code of conduct of the Company in force, at present, and as varied from time to time.
7. The Company will expect you to discharge the responsibilities entrusted to you with the highest standards of initiative, efficiency and economy.
8. Your appointment is subject to satisfactory replies being received from the references / previous employers mentioned in your Employment Application Form.
9. Your appointment / continuance in the services of the Company will be subject to your physical fitness check and verification check (which includes certificates in proof of educational qualifications, proof of past employment & date of birth, reference checks, address verification, past employments and delinquency verification) by any agency appointed by us for this purpose. Consequently, you will be required to go through such medical tests and examinations from time to time as may be deemed necessary by the Company.
10. This appointment letter is being issued to you on the basis of the information and particulars furnished by you in your application (including bio-data), at the time of your interview and subsequent discussions. If it transpires that you have made a false statement (or have not disclosed a material fact) resulting in your being offered this appointment, the Management



ADITYA BIRLA RETAIL LIMITED

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may take such action as it deems fit in its sole discretion, including termination of your employment.

11. The foregoing constitutes the entire agreement as regards the terms and conditions of your service with the Company and they shall be subject to such modifications and amendments as may be introduced from time to time as per the Company's Rules & Regulations.

Please sign and return to the undersigned the duplicate copy of this letter signifying your acceptance.

Yours truly,
for Aditya Birla Retail Limited;



Sandeep Khosla
Zonal Head – Human Resource



(DALJIT SINGH)

Signature & Name of Candidate



Salary Annexure

Name:	Daljit Singh
Employee Code:	1015031
Unit:	Aditya Birla Retail Ltd.
Department:	Operations
Designation:	Customer Service Supervisor
Location	Patiala

Salary Components	Monthly	Annually
Basic + DA	3450	41400
Other Allowance	2200	26400
Total Gross (A)	5650	67800
PF (Employer Contribution)	414	4968
Gratuity	166	1992
ESIC (Employer Contribution)	268	3216
Total Retirals (B)	848	10176
CTC (A+B)	6498	77976
Deductions		Monthly
Employee Contribution to PF (12% of Basic + DA)		414
ESIC (1.75% of the gross)		99
Total Deduction (C)		513
Net Monthly Take Home Salary (A-C)		5137 ✓

For Aditya Birla Retail Limited



Sandeep Khosla
Zonal Head - Human Resource

~~5137~~
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Exhibit 38

Mob : 9814102758

SIRAT HEART & CHILD CARE CENTRE

Near Mandir Tayagi Mata, Sanouri Gate, Patiala

ਸੀਰਤ ਹਾਰਟ ਐਂਡ ਚਾਈਲਡ ਕੇਅਰ ਸੈਂਟਰ

ਨੇੜੇ ਮੰਦਰ ਤਿਆਗੀ ਜੀ, ਸਨੌਰੀ ਅੱਡਾ, ਪਟਿਆਲਾ

Dr. Madanjit Singh

MBBS, DCH, (Paediatrics)

M.D. (Medicine)

Sr. Consultant Physician
and Child Specialist

Formerly : Medical Officer,
Rajindra Hospital, PATIALA

Reg. No: 21781

NAME AGE/SEX DATE

To whom it may concern

This is to certify that
 as per record, Mr. Daljit Singh
 3/0 Sh Mohinder Singh R10 village
 Sanour, Patiala underwent
 my treatment as a case of
 Multiple injuries (Non medico
 legal case) w.e.f 28/1/2010 to
 30/1/2010 and again on 17/3/2010
 to 21/3/2010. During this
 period he was given IV fluids
 Analgesics and antibiotics. He
 was advised rest during his
 period.

myus
 28/1/2010

TIMING:

(Morning) 10:00 AM - 2:00 PM, (Evening) 5:00 PM (Sunday) 10:00 AM - 12:00 noon

NOT VALID FOR REG. CO. LEGAL PURPOSES

DR. MADANJIT SINGH
 M.B.B.S., D.C.H. (P)
 Regd. No. P.B. 21781

2/19
 [Signature]

Mob : 9814102758

SIRAT HEART & CHILD CARE CENTRE

Near Mandir Tayagi Mata, Sanouri Gate, Patiala

ਸੀਰਤ ਹਾਰਟ ਐਂਡ ਚਾਈਲਡ ਕੇਅਰ ਸੈਂਟਰ

ਨੇੜੇ ਮੰਦਰ ਤਿਆਗੀ ਜੀ, ਸਨੌਰੀ ਘੱਡਾ, ਪਟਿਆਲਾ

Dr. Madanjit Singh

MBBS, DCH, (Paediatrics)

M.D. (Medicine)

Sr. Consultant Physician
and Child Specialist

Formerly : Medical Officer,

Rajindra Hospital, PATIALA

Reg. No: 21781

NAME Mr. Daljit Singh - 28yr Male AGE/SEX 28yr Male DATE 28/11/2010

S/O Sh Mohinder Singh

28/11/2010

C/O Multiple
Injuries; Pain
all over the body
(Non M.C.)
on Exam.

Rp.

1) 9/12 fluids

BP 110/70 mm
Pulse 94/min

2) 9mg rocuron
2/m stat

Respiratory N/A
CVS - N/A
Chest - Multiple
fractures and
bruises. No
obvious fracture

3) 7ar Monoclof
20 mg BID

Bleeding gums

4) 7ar Dolowin 650
1 - - - 1

PIA. N/A

Hot cementation
1 complete half for
2 hrs |

Adm 1st, 2nd, 3rd
RMS 1st, 2nd, 3rd
P.A. on

DR. MADANJIT SINGH
M.B.B.S. (Med.)
Reg. No. Ph. 21781

28/11/2010

TIMING: (Morning) 10:00 AM - 2:00 PM, (Evening) 5:30 PM - 8:00 PM (Sunday) 10:00 AM - 12:00 noon

NOT VALID FOR MEDICO LEGAL PURPOSES

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Mob : 9814102758

SIRAT HEART & CHILD CARE CENTRE

Near Mandir Tayagi Mata, Sanouri Gate, Patiala

ਸੀਰਤ ਹਾਰਟ ਐਂਡ ਚਾਈਲਡ ਕੇਅਰ ਸੈਂਟਰ

ਨੇੜੇ ਮੰਦਰ ਤਿਆਗੀ ਜੀ, ਸਨੌਰੀ ਅੱਡਾ, ਪਟਿਆਲਾ

Dr. Madanjit Singh

MBBS, DCH, (Paediatrics)

M.D. (Medicine)

Sr. Consultant Physician
and Child Specialist

Formerly : Medical Officer,
Rajindra Hospital, PATIALA

Reg. No: 21781

NAME M. S. Salju Singh AGE/SEX 2.844 Male DATE 17/3/2010

S/O S. Mohinder Singh -

17/3/2010

O/C
Multiple
injuries

Asymptomatic
and bruises
over the arm
and leg and chest

No pain and swelling
left middle
finger

AD 130/10
Adv. Due 7/4/2010

X-ray left
middle
finger

O/C

Multiple
injuries

left middle
finger

(1) Tab. Augmentin
625mg

(2) Tab. Solonox
Plus

(3) A. S. dressing

(4) orthopaedic
consultation

(5) complete rest

for 2 wks

TIMING: _____

(Morning) 10:00 AM - 2:00 PM, (Evening) 5:30 PM - 8:00 PM (Sunday) 10:00 AM - 1:00 PM

NOT VALID FOR MEDICO-LEGAL PURPOSES

DR. MADANJIT SINGH
M.B.B.S., D.Ch., M.D. (Med.)

17/3/2010
Regd. No. Pb. 21781

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Exhibit 39



SHIROMANI AKALI DAL

(S. SIMRANJIT SINGH MANN M.P.)

ADMIN. OFFICE : QUILLA S. HARNAM SINGH, PIN CODE:140 406
H SAHIB (PUNJAB) INDIA PH. : 0091-1763-30211



NAME S. DALJIT SINGH

DESIGNATION ACTIVE MEMBER

SIGNATURE Daljit

870 S. MOHINDER SINGH
ADDRESS VPO :- SANOUR, TEH & DIST
:- PATIALA (Pb.).

ID NUMBER 540/1332/5009 DATE OF ISSUE September 7, 2010

Iqbal Singh
Iqbal Singh Tiwana
Political & Media Advisor
&
Incharge Head Office
ISSUING AUTHORITY
Shiromani Akali Dal (Amritsar)

If found please return to address overhead. Return postage not payable.

223
2010

Exhibit 40

ੴ ਸਤਿਗੁਰ ਪ੍ਰਸਾਦਿ ॥

ਸ਼੍ਰੋਮਣੀ ਅਕਾਲੀ ਦਲ



ਨਾ ਅਸੀਂ ਹਿੰਦੂ ਨਾ ਮੁਸਲਮਾਨ ਸਾਡੀ ਸੰਜਿਲ ਖਾਲਿਸਤਾਨ

SHIROMANI AKALI DAL

PRESIDENT : S. SIMRANJIT SINGH MANN

ਮੁੱਖ ਦਫਤਰ

ਕਿਲ੍ਹਾ ਸ: ਹਰਨਾਮ ਸਿੰਘ

ਜ਼ਿਲ੍ਹਾ ਫਤਹਿਗੜ੍ਹ ਸਾਹਿਬ

ਪਿੰਨ ਕੋਡ-140406

ਪੰਜਾਬ (ਇੰਡੀਆ)

ਟੈਲੀਫੋਨ : 0091-1763-233764

HEAD OFFICE

QUILLA S.HARNAM SINGH

DISTT. FATEHGARH SAHIB

PIN CODE 140406

PANJAB (INDIA)

TELEFAX : 0091-1763-233764

No. SAD/5073/2012

Dated : May 29th , 2012

Quilla S. Harnam Singh.

Fatchgarh Sahib.

TO WHOM IT MAY CONCERN

This is to certified that that S. Daljit Singh S/o S. Mohinder Singh resident of Village & Post Office Sanaur, Tehsil & District Patiala, Punjab (India) is an active member of Shiromani Akali Dal Amritsar He has been participated in activities of the party and arrested so many times. Now he is residing at APT 304, 2356 15TH AVENUE S SEATTLE, WASHINGTON- 98144 U.S.A. He has been also support in our meetings, rallies and demonstration against violation of Human Rights and Atrocities on Sikh's in Punjab. Due to demonstration programme of our party, many times he and his family members faced harassment by Punjab Police S. Daljit Singh was forced to flee the country.

It is well known fact that the members of this party including our party president S. Simranjit Singh Mann have been suffering at the hands of Indian Government and a large number of our party workers have fled from India to avoid future persecution. So many members were killed in false encounters by the Punjab Police and their dead bodies were hastily cremated as unclaimed. Many are still languishing in jails. The police arrested our respected president unlimited number of times and he was kept in jail for long period of time. While he was in custody he was harassed and mistreated. When our president raised the voice of Sikh Freedom , government arrested him and put him in jail.

Should S. Daljit Singh return to India to adopt a normal life, it is more than likely that he would be persecuted by the government agencies. He may be kept in illegal confinement or be eliminated like many other activities , who have been killed in the name of fighting of the insurgency -lending support to the formation of Khalistan or freedom for the Sikhs . As such I would recommend S. Daljit Singh be given political asylum as per the just and liberal laws of your country in accordance with UN charter.



Q. S. Harnam Singh
29x06x12

(IQBAL SINGH TIWANA)

Political & Media Advisor,

&

Incharge Head Office.

Shiromani Akali Dal (Amritsar) .

Iqbal Singh Tiwana

Political & Media Advisor

&

Incharge Head Office

Shiromani Akali Dal (Amritsar)

225
225

Exhibit 41

In removal proceedings under section 240 of the Immigration and Nationality Act

File No: 200 893 771

In Matter of:
Respondent: SINGH, Daljit Currently residing at:

Willacy Detention Center 1800 Industrial Drive Raymondville, Texas 78580
(Number, street, city, state, and ZIP code) (Area code and phone number)

- 1. You are an arriving alien.
- 2. You are an alien present in the United States who has not been admitted or paroled.
- 3. You have been admitted to the United States, but are deportable for the reasons stated below.

The Service alleges that you:

- 1) You are not a citizen or national of the United States.
- 2) You are a native of India and a citizen of India.
- 3) You entered the United States at or near Laredo, TX on 12/20/2010.
- 4) You did not then possess or present a valid immigrant visa, reentry permit, border crossing identification card, or other valid entry document.
- 5) You were not then admitted or paroled after inspection by an immigration officer.

*NTA BX#1 Adm
1/24/11 JDS/HEA*

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act(Act), as amended, as immigrant who, at the time of application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to: 8 CFR 208.30(f)(2) 8 CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:
HLG 2009 West Jefferson, Suite 300, Harlingen, TX 78550

(Complete Address of Immigration Court, including Room Number, if any)

on To Be Determined at To Be Determined to show why you should not be removed from the United States based on the charge(s) set forth above.
(Date) (Time)

BVA
Supervisory Asylum Officer
(Signature and Title of Issuing Officer)

Date: JAN 10 2011

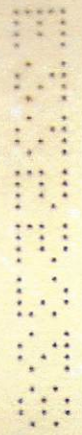
Houston, TX
(City and State)

See reverse for important information

*8
227*

Exhibit 42

330



MOHINDER SINGH
 Name of the holder of the passport
 MANJIT KAUR
 Name of the holder of the passport
 NAVDEEP KAUR
 Name of the holder of the passport
 FATHERPUR ROAD
 Address
 SANAUR,
 DT PATIALA-PUNJAB-147103
 Date of issue and place of issue of the passport
 CHDA0044702
 Passport No.

धरतिरवय
 सिद्धि के लिये यह पत्र सादर मांगते हैं कि आपकी सेवा में निम्नलिखित कार्य/कार्यक्रमों को प्राथमिकता से पूरा किया जाए।

धरतिरवय
 यह पत्र सादर मांगते हैं कि आपकी सेवा में निम्नलिखित कार्य/कार्यक्रमों को प्राथमिकता से पूरा किया जाए।

REGISTRATION
 INDIAN CITIZENS RESIDENT ABROAD ARE ADVISED TO REGISTER THEMSELVES AT THE NEAREST INDIAN MISSION; POST.

CAUTION
 THIS PASSPORT IS THE PROPERTY OF THE GOVERNMENT OF INDIA. ANY COMMUNICATION RECEIVED BY HOLDER FROM THE PASSPORT AUTHORITY REGARDING THIS PASSPORT, INCLUDING DEMAND FOR ITS SURRENDER, SHOULD BE COMPLIED WITH IMMEDIATELY. PASSPORT SHOULD NOT BE SENT OUT OF ANY COUNTRY BY POST. IT SHOULD BE IN THE CUSTODY EITHER OF THE HOLDER OR OF A PERSON AUTHORIZED BY THE HOLDER. IT MUST NOT BE ALTERED OR MUTILATED IN ANY WAY.

LOSS, THEFT OR DESTRUCTION OF PASSPORTS SHOULD BE IMMEDIATELY REPORTED TO THE NEAREST PASSPORT AUTHORITY IN INDIA OR (IF THE HOLDER IS ABROAD) TO THE NEAREST INDIAN MISSION AND TO THE LOCAL POLICE. ONLY AFTER EXHAUSTIVE ENQUIRIES SHALL A REPLACEMENT PASSPORT BE ISSUED.

Exhibit 43

Gurleen Kaur

Passport - Unavailable



AFFIDAVIT

ANNEXURE 'G'

I Navdeep Kaur W/o Daljit Singh Resi H No – 229 ward No -5 Sanaur Distt Patiala

....solemnly declare and affirms as follows:

1. That I/We am/are the mother/father/parents/guardians of . Gurleen Kaur .. who is a minor child and on whose behalf I/We have made an application for his/her passport.
2. Signature/Consent of Mrs Navdeep Kaur who is father/mother/parents of the child has not been obtained by me for the following reasons:
3. That I/We only am/are taking care of Gurleen Kaur and he/she is exclusively in my physical custody.
4. I/We also affirm that in the case of a court case arising due to issue of a passport to I /we would be solely responsible for defending the case and not the passport issuing Authority

Navdeep Kaur
Signature & Address of the parent(s)/

Date :

guardian(s) applying for the Passport

233

AFFIDAVIT ATTESTATION

Id No **11620**
Stamp Paper No. **176**
Name **NAVDEEP KAUR**
Father/Husband's Name **DALJIT SINGH**
Address **229/5, SANOUR DIST PATIALA**
Identity **PASSPORT - G9628148 -**

Entry Date: **01 Jul 2014**



Facilitation Charges Rs. **30**
The above person appeared and deposed before me.




Executive Magistrate
District: PATIALA

234




SCN/301860670/14

GOVERNMENT OF INDIA
MINISTRY OF EXTERNAL AFFAIRS
REGIONAL PASSPORT OFFICE, CHANDIGARH

Tel No: 01722606889,02624987
Fax No: 26018632
E-mail: rpo.chandigarh@mea.gov.in
Website: www.passportindia.gov.in
File No: CH4067457804413
Letter Ref. No: SCN/301860670/14

REGIONAL PASSPORT OFFICE
CHANDIGARH, SCO 28-32, SECTOR 34-
A, CHANDIGARH-160022

To,

Dated: May 5, 2014

GURLEEN KAUR , HOUSE NO.- H NO 229 W NO
5 KAHANSIA ROAD, SANOUR, , DISTRICT-
PATIALA, STATE- PUNJAB, COUNTRY- INDIA,
PINCODE- 147103, TEL. NO.-

**Subject: Clarifications required regarding Issuance of Passport facilities to Shri/ Smt/ Kumari/
Master GURLEEN KAUR
Holding of Passport Adalat/ Last Opportunity - Regarding**

Sir/ Madam,

1. A passport Adalat is being held in this office to dispose of the pending cases.
2. Your Passport Application is pending because of Non Submission of required documents/ Explanation. In case you fail to attend the said passport Adalat Your application may be closed.
3. You are therefore, request to attend the said Passport Adalat personally as per the date, time and place mentioned below.
Venue : Regional Passport Office, SCO 28-32, Sector- 34A, Chandigarh.
Date : 16th July,2014 (Wednesday)
Time : 9.30 AM to 12.30 PM.
4. You are required to bring with you all the original documents along with one photocopy and File No Receipt/ Fee Receipt as well as copy of this letter.
5. This is a computer generated copy and needs no signature.

Yours Faithfully,
For Regional Passport Officer,
Chandigarh

235
235

Exhibit 44

236
35

Harleen Kaur

Passport - Unavailable



AFFIDAVIT

ANNEXURE 'G'

I Navdeep Kaur W/o Daljit Singh Resi H No - 229 ward No -5 Sanaur Distt Patiala

...solemnly declare and affirms as follows:

1. That I/We am/are the mother/father/parents/guardians of . Harleen Kaur .. who is a minor child and on whose behalf I/We have made an application for his/her passport.
2. Signature/Consent of Mrs Navdeep Kaur who is father/mother/parents of the child has not been obtained by me for the following reasons:
3. That I/We only am/are taking care of Harleen Kaur and he/she is exclusively in my physical custody.
4. I/We also affirm that in the case of a court case arising due to issue of a passport to I /we would be solely responsible for defending the case and not the passport issuing Authority

Navdeep Kaur
Signature & Address of the parent(s)/
guardian(s) applying for the Passport

Date :

AFFIDAVIT ATTESTATION

Id No	11620
Stamp Paper No.	176
Name	NAVDEEP KAUR
Father/Husband's Name	DALJIT SINGH
Address	229/5, SANOUR DIST PATIALA
Identity	PASSPORT - G9628148 -
Facilitation Charges Rs	30

Entry Date: **01 Jul 2014**



The above person appeared and deposed before me.




Executive Magistrate
District: PATIALA

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ANNEXURE 'H'

DECLARATION OF APPLICANT PARENTS

We affirm that the particulars given above are of Harleen Kaur Daughter of Shri. Daljit Singh and Smt. Navdeep Kaur of whom we are the Parents. She is a Citizen of India. Her place of birth is Sanour, Distt, Patiala (Punjab) We undertake the entire responsibility for her expenses. We solemnly declare that she has not lost, surrendered or been deprived of her citizenship of India and that the information given in respect of her in this application is true. It is also certified that we are holding valid Indian passport(s)

Daljit

Father (Signature)

/ _____
Mother (Signature)



Nandeshwar
01/14/14

WA
USA **WASHINGTON** COMMERCIAL
DRIVER LICENSE



4d LIC# SINGHD*194JQ

1 SINGH
2 DALJI

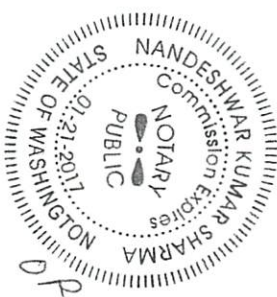
3 DOB 04-18-1981

8 2386 15TH AVE S APT 304
SEATTLE WA 981445857

15 Sex M 16 Hgt 5-04
17 Wgt 175 18 Eyes BRN
9 Cntrs A 23 Etn NONE
12 Restrictions NONE

4a ISS 01-11-2013
4b Exp 01-18-2017

5 DD SINGHD*194JQ13139132D1610 Rev 03-15-2009



*Original Notary
Kumar Sharma
01/18/17*

*241
1/18*

TO : REGIONAL PASSPORT AUTHORITIES
CHANDIGARH PUNJAB INDIA.

NO OBJECTION LETTER FOR ISSUING A PASSPORT TO MINOR UNDER 21 YR

TO WHOM IT MAY CONCERN

MY NAME IS DALJIT SINGH , I WAS BORN APRIL 04,1981 IN PATIALA PUNJAB INDIA. I CURRENTLY RESIDE AT 4317 SW DAWSON STREET SEATTLE WA 98136 USA. I AM A BIOLOGICAL PARENT OF HARLEEN KAUR. MY WIFE NAVDEEP KAUR IS TRYING TO OBTAIN A PASSPORT FOR OUR DAUGHTER HARLEEN KAUR

I HAVE NO OBJECTION OF ISSUEING HER INDIAN PASSPORT.

I DALJIT SINGH HEREBY CONFIRM THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND I HAVE NO OBJECTION TO THIS MATTER.

I CERTIFY THAT I KINO OR HAVE SATISFACTORY EVIDENCE THAT ~~DALJIT~~^{DALJIT SINGH}.....IS THE PERSON WHO APPEARED BEFORE ME, AND SAID PERSON ACKNOWLEDGED IT WAS A FREE AND VOLUNTARY ACT SUCH PARTY FOR THE USES AND PURPOSES MENTION IN THIS INSTRUMENT.

DALJIT SINGH



NOTARY PUBLIC IN AND FOR THE STATE OF WASHINGTON

PRINT NAME NANDESHWAR SHARMA

RESIDING AT 3725 E 188th St Seattle WA 98188 USA

MY APPOINTMENT EXPIRES JAN 21, 2017

STATE OF WA

COUNTY OF KING

SIGNATURE OF NOTARY



01/18/2017



242
en
##



SCN/301860672/14

GOVERNMENT OF INDIA
MINISTRY OF EXTERNAL AFFAIRS
REGIONAL PASSPORT OFFICE, CHANDIGARH

Tel No: 01722606889,02624987
Fax No: 26018632
E-mail: rpo.chandigarh@mea.gov.in
Website: www.passportindia.gov.in
File No: CH4067457881613
Letter Ref. No: SCN/301860672/14

REGIONAL PASSPORT OFFICE
CHANDIGARH, SCO 28-32, SECTOR 34-
A, CHANDIGARH-160022

To,

Dated: May 5, 2014

HARLEEN KAUR, HOUSE NO.- H NO 229, W
NO 5, KAHANSIA ROAD,, SANOUR, ,
DISTRICT- PATIALA, STATE- PUNJAB,
COUNTRY- INDIA, PINCODE- 147103, TEL.
NO.-

**Subject: Clarifications required regarding Issuance of Passport facilities to Shri/ Smt/ Kumari/
Master HARLEEN KAUR
Holding of Passport Adalat/ Last Opportunity - Regarding**

Sir/ Madam,

1. A passport Adalat is being held in this office to dispose of the pending cases.
2. Your Passport Application is pending because of Non Submission of required documents/ Explanation. In case you fail to attend the said passport Adalat Your application may be closed.
3. You are therefore, request to attend the said Passport Adalat personally as per the date, time and place mentioned below.
Venue : Regional Passport Office, SCO 28-32, Sector- 34A, Chandigarh.
Date : 16th July,2014 (Wednesday)
Time : 9.30 AM to 12.30 PM.
4. You are required to bring with you all the original documents along with one photocopy and File No Receipt/ Fee Receipt as well as copy of this letter.
5. This is a computer generated copy and needs no signature.

Yours Faithfully,
For Regional Passport Officer,
Chandigarh

243
247

Exhibit 45

Inderpal Singh

Passport - Unavailable

245
~~244~~



I Navdeep Kaur W/o Daljit Singh Resi H No – 229 ward No -5 Sanaur Distt Patiala
....solemnly declare and affirms as follows:

1. That I/We am/are the mother/father/parents/guardians of . Inderpal Singh ..
who is a minor child and on whose behalf I/We have made an application for
his/her passport.
2. Signature/Consent of Mrs Navdeep Kaur who is father/mother/parents of the
child has not been obtained by me for the following reasons:
3. That I/We only am/are taking care of Inderpal Singh and he/she is
exclusively in my physical custody.
4. I/We also affirm that in the case of a court case arising due to issue of a
passport to I /we would be solely responsible for defending the case and not
the passport issuing Authority

Navdeep Kaur
Signature & Address of the parent(s)/
guardian(s) applying for the Passport

Date :

246
245

AFFIDAVIT ATTESTATION

Id No **11620**
Stamp Paper No. **176**
Name **NAVDEEP KAUR**
Father/Husband's Name **DALJIT SINGH**
Address **229/5, SANOIR DIST PATIALA**
Identity **PASSPORT - 9628148 -**
Facilitation Charges-Rs **30**
The above person appeared and deposed before me.

Entry Date: **01 Jul 2014**




Executive Magistrate
District: PATIALA

347
2/16

Exhibit 46

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247

Exhibit 47

Payslip for MAY 2010

Personnel No.	1015031	Name	Daljit Singh
Bank	HDFC	Bank A/c No.	01081050060270
DOJ	20/Jul/2009	LOP Days	0
PF No.	MH/BND/48681/13161	STD Days	31
Location	Patiala	Worked Days	31
Department	Store Operations	Designation	Customer Service Supervisor
ESI Number	10461532		

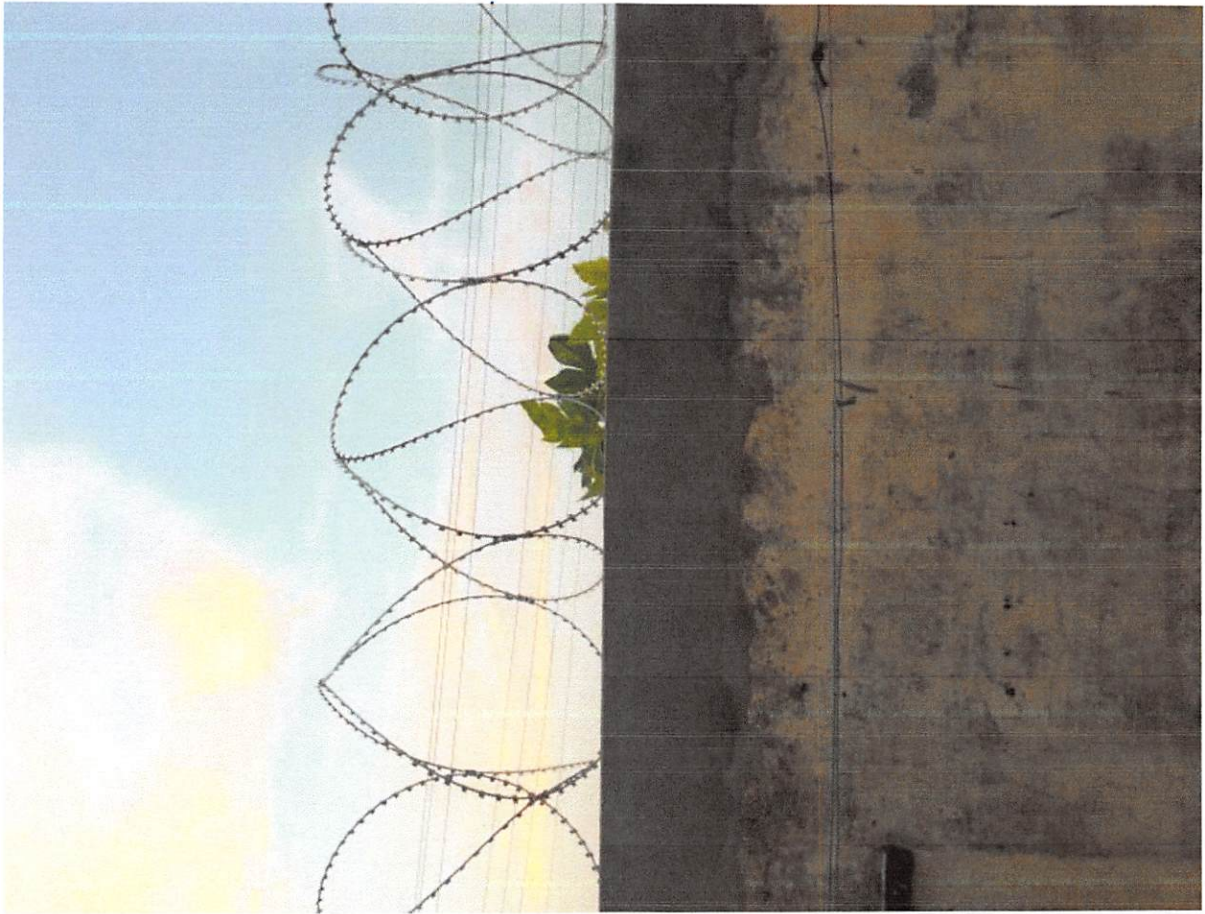
Earnings	Amount in Rs.	Deductions	Amount in Rs.
BASIC	3,450.00	PROVIDENT FUND	414.00
MONTHLY OTHER ALLOWANCE	2,200.00	PF ARREARS	13.00
HOLIDAY WAGES	182.00	ESI	103.00
		LWF	1.00
GROSS EARNING	5,832.00	GROSS DEDUCTIONS	531.00
	NET PAY 5,301.00		

This is a system generated communication and hence requires no signature

252
8/21

Exhibit 48

253
~~252~~



254
~~253~~



255
~~254~~



256
388



257
256



258
3/5

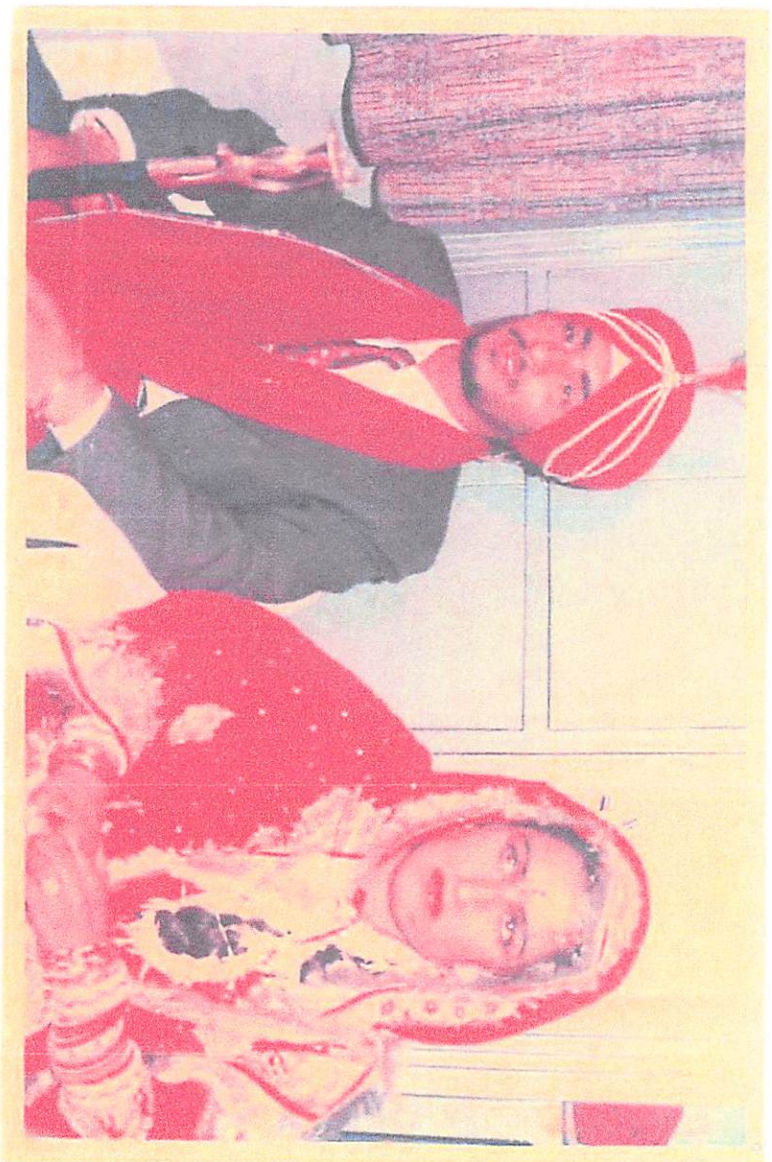


259
258



260
~~259~~

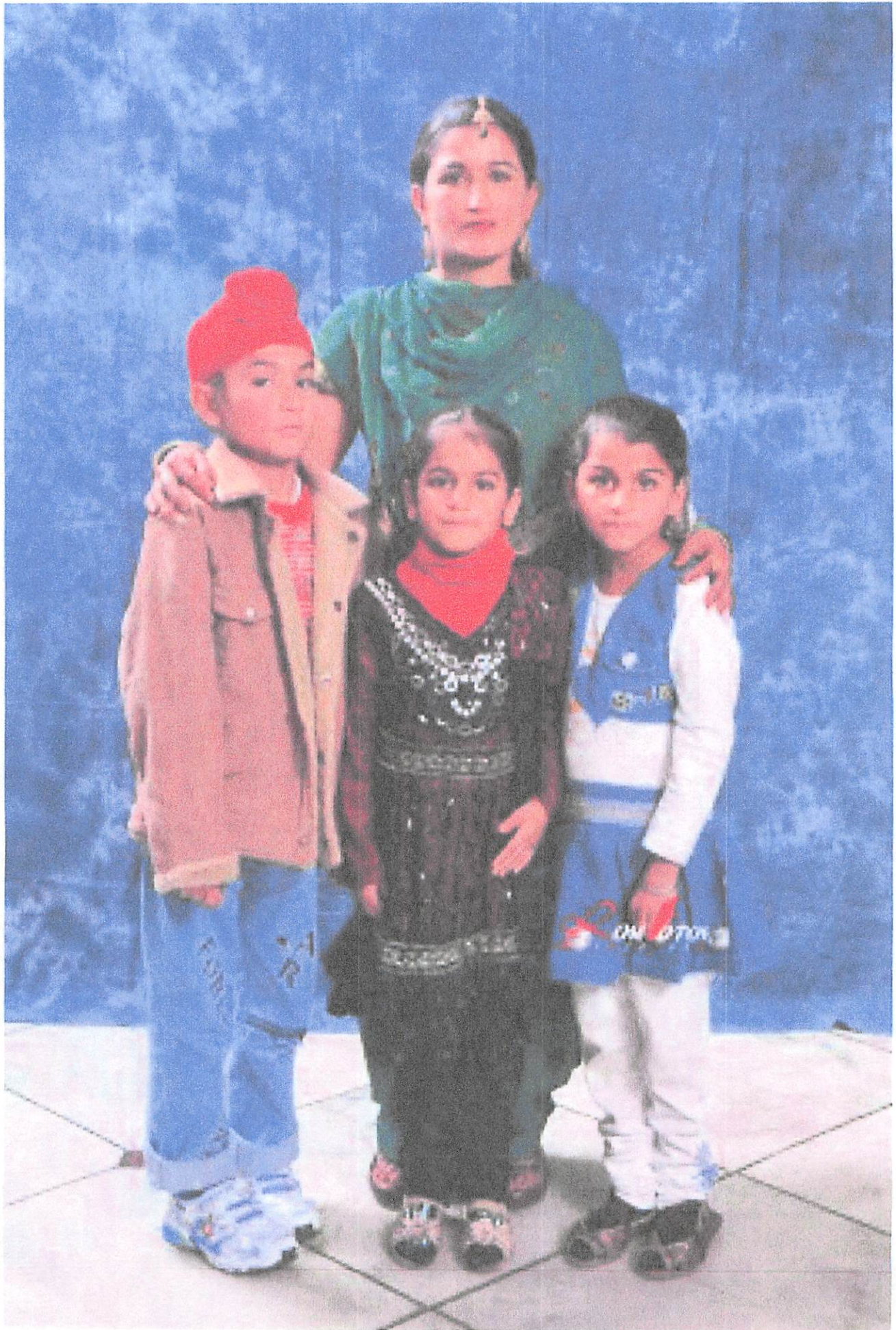
Exhibit 49



362
H
1/13



263
~~262~~
4/11



264
~~333~~
AS

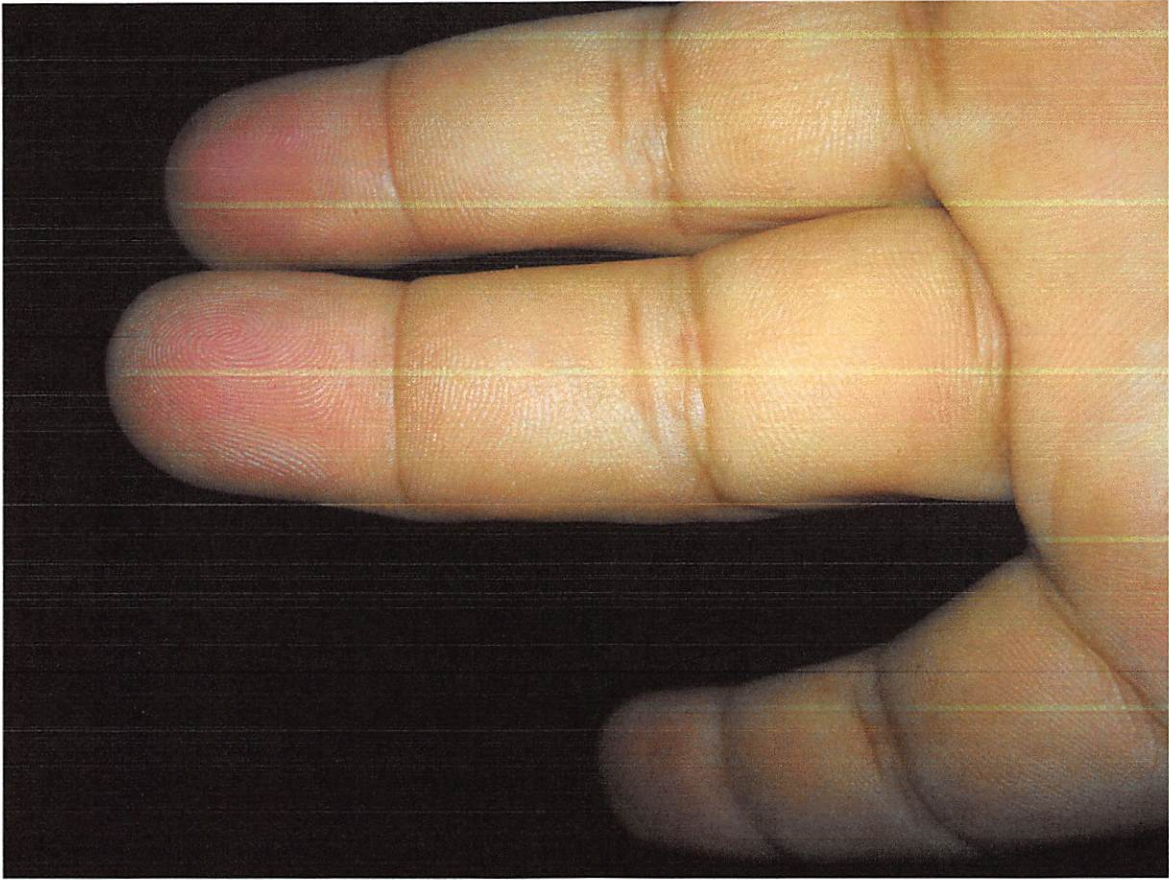
Exhibit 50



gbb
gbb



267
3/6



268
3/6/17

Exhibit 51

269
~~268~~

PSYCHOLOGICAL EVALUATION

Name: Daljit Singh
Date of Administration: March 18, 2015
Referral Source: Christine Phillips of William Frick law offices, Seattle, WA
Examiner: Allison Ramsey, MS, Psychology
Licensed Mental Health Counselor LH60211182
Date of Report: March 20, 2015

PROFESSIONAL BACKGROUND AND QUALIFICATIONS

I received my Bachelor of Arts degree in Psychology with a minor in Sociology from University of Missouri-Columbia in 2001. I worked as a clinical case manager at New Horizons Community Support Services in Columbia, Missouri for 2 years. I received my Master of Science degree in Psychology with emphasis in Mental Health Counseling from Western Washington University in 2009. This program is accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP), an affiliate of the American Counseling Association. I interned at Interfaith Community Mental Health Center in Bellingham, Washington for one year. I have worked at Community Psychiatric Clinic in Seattle, Washington as a clinical case manager for 3 years. I am qualified as a National Certified Counselor and am a Licensed Mental Health Counselor in the state of Washington. I am a certified grief counselor. I have experience completing diagnostic intake assessments and provided mental health counseling for people experiencing a range of mental illnesses including depressive disorders, anxiety disorders, bipolar disorder, psychotic disorders, posttraumatic stress disorder, personality disorders, mental retardation, and attention-deficit / hyperactivity disorder.

PURPOSE OF EVALUATION

The purpose of the evaluation was to assess Daljit's general psychological condition and the manner in which the trauma he experienced has impacted his mental health. In particular, Daljit shall be evaluated for post traumatic stress disorder.

BEHAVIORAL OBSERVATIONS

Daljit arrived on time for the interview. Daljit was dressed casually in weather-appropriate attire. He appeared to be of his stated age, 34. Daljit completed three questionnaires (described below) in the waiting area detailing his experiences with various symptoms of mental illness. Upon completion of the questionnaires I found him in the waiting area, with a blank stare on his face, emotionless. I invited him into the office where he immediately began to cry. Daljit was oriented to time, date, and place. He answered questions openly, elaborating easily. Once we began discussing his past he was verbose, appearing relieved to get to speak to someone about his thoughts. He became tearful at times throughout the interview when discussing his experiences in India, his family, and his lack of hope for the future.

HISTORY

Prior to meeting with Daljit, I reviewed his written declaration. Upon his arrival, Daljit and I discussed his history. His description of the events he experienced was consistent with his written declaration. I asked about some of his history out of chronological order, to test for truthfulness. He had no difficulty relating the events of his past. He reported that "I was so blessed before all this. I was living in Heaven on Earth with my wife and children." Daljit reported he has neither

spoken to a mental health counselor nor been prescribed medications for mental health problems in the past.

DIAGNOSTIC EVALUATION

Daljit was evaluated for symptoms of post traumatic stress disorder, depression, and anxiety. The evaluation was performed in my professional office, 3232 15th Avenue West, Suite 101, Seattle, Washington, 98119. To assess Daljit for these symptoms, I asked him open ended questions regarding each of the symptoms detailed below in the fifth edition of the Diagnostic Statistical Manual by American Psychiatric Association. An example of an interview question is "Tell me about your sleep." or "Describe a typical day."

Daljit completed three questionnaires to assess for a history of psychological difficulties. The PTSD Symptom Scale is a 17 item self-report questionnaire that asks the participant to answer yes or no questions regarding traumatic history (Foa, et al, 1993). Daljit answered "almost always" (five or more times per week) to "Trying not to think or talk about the traumatic event", "Trying to avoid activities or people that remind you of the traumatic event", "Feeling as if your future hopes or plans will not come true", "Having trouble falling or staying asleep", and "Feeling irritable or having fits of anger." For all other statements he answered positively, indicating he experienced them at least once per week, and others he experienced half the time.

The second questionnaire is the Patient Health Questionnaire, a nine item self-report instrument used to screen, diagnose, and monitor the severity of depression symptoms (Spitzer, et al, 1999). Daljit endorsed experiencing eight out of nine of the depression symptoms in the last two weeks, all except suicidal ideation. According to the DSM-5, the severity of the symptoms he indicates qualifies him for a diagnosis of Major Depressive Disorder (moderate). However, these symptoms are better explained by the negative mood symptoms of post traumatic stress disorder. Daljit indicated that he had been "living in heaven" before he was threatened and beaten in India.

The third questionnaire was the Beck Anxiety Inventory, a 21 item self-report scale used to screen, diagnose, and monitor symptoms of anxiety (Beck, et al, 1988). Daljit answered positively to items such as "feeling of the worst happening"; "feeling shaky or unsteady"; and "unable to relax"; "fear of dying". While his answers qualify him for a diagnosis of moderate anxiety, these symptoms are better explained by the intrusion and arousal symptoms of post traumatic stress disorder.

The interview lasted two hours. From Daljit's answers, it became clear that he suffers from symptoms of post traumatic stress disorder as a result of the trauma he experienced in India. He indicated that he had not experienced these clusters of symptoms prior to the first beating. The interview lasted two hours.

Post Traumatic Stress Disorder (PTSD) is the development of a set of symptoms following exposure to an extremely traumatic stressful event. The American Psychiatric Association's Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5) states that in order to qualify for a diagnosis of PTSD must meet the following criteria:

A. Exposure to actual or threatened death, serious injury or sexual violence in one or more ways:

1. Directly experiencing traumatic event(s).
2. Witnessing, in person, the event(s) as it occurred to others.
3. Learning that the traumatic event(s) occurred to close family member or close friend. In cases of actual or threatened death the event(s) must have been violent or accidental.
4. Experiencing repeated or extreme exposure to aversive details of the traumatic event(s).

B. Presence of one or more of the following intrusion symptoms associated with the traumatic event(s), beginning after the traumatic event(s) occurred:

1. Recurrent, involuntary, and intrusive memories of the traumatic event(s).
2. Recurrent distressing dreams in which the content and/or affect of the dream are related to the traumatic event(s).
3. Dissociative reactions (flashbacks) in which the individual feels or acts as if the traumatic event were recurring. (Such reactions may occur on a continuum, with the most extreme expression being a complete loss of awareness of present surroundings.)
4. Intense or prolonged psychological distress at exposure to internal or external cues that symbolize or resemble an aspect of the traumatic event(s).
5. Marked physiological reactions to internal or external cues that symbolize or resemble an aspect of the traumatic event(s).

C. Persistent avoidance of stimuli associated with traumatic event(s), beginning after the traumatic event(s) occurred, as evidenced by one or both of the following:

1. Avoidance of or efforts to avoid distressing memories, thoughts, or feelings about or closely associated with the traumatic event(s).
2. Avoidance of or efforts to avoid external reminders (people, places, conversations, activities, objects, situations) that arouse distressing memories, thoughts, or feelings about or closely associated with the traumatic event(s).

D. Negative alterations in cognitions and mood associated with the traumatic event(s), beginning or worsening after the traumatic event(s) occurred, as evidenced by two (or more) of the following:

1. Inability to remember important aspect of the traumatic event(s) (typically due to dissociative amnesia and not to other factors such as head injury, alcohol, or drugs).
2. Persistent and exaggerated negative beliefs or expectations about oneself, others, or the world (e.g., "I am bad," "No one can be trusted," "The world is dangerous," "My whole nervous system is permanently ruined").
3. Persistent distorted cognitions about the cause or consequences of the traumatic event(s) that lead the individual to blame himself/herself or others.
4. Persistent negative emotional state (e.g., fear, horror, anger, guilt, shame).
5. Markedly diminished interest or participation in significant activities.
6. Feelings of detachment or estrangement from others.
7. Persistent inability to experience positive emotions (e.g., happiness, satisfaction, or loving feelings).

E. Marked alterations in arousal and reactivity associated with the traumatic event(s), beginning or worsening after the traumatic event(s) occurred, as evidenced by two (or more) of the following:

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1. Irritable behavior and angry outbursts (with little or no provocation) typically expressed as verbal or physical aggression toward people or objects.
2. Reckless or self-destructive behavior.
3. Hypervigilance.
4. Exaggerated startle response.
5. Problems with concentration.
6. Sleep disturbance (e.g., difficulty falling or staying asleep or restless sleep).

F. Duration of the disturbance (Criteria B, C, D, and E) is more than 1 month.

G. The disturbance causes clinically significant distress or impairment in social, occupational or other important areas of functioning.

H. The disturbance is not attributable to the physiological effects of a substance (e.g., medication or alcohol) or another medical condition.

CRITERION A (Traumatic Events)

Symptom (1), (2)

Daljit was seventeen when he witnessed his father being beaten by Indian police. He said "I saw the police throw my father on the ground, kick his turban off and beat him." He added that it made him very fearful and he had trouble sleeping after that event (Symptom 2). More impactful though were the beatings that he experienced in 2010. On three separate occasions his life was threatened and on two occasions he was beaten so badly he thought they were going to kill him. He explained, "They kept pushing me and hitting me, one said 'Kill him,' and he tried to shove a sharp object in my neck. My arm came up like a reflex to protect myself and the sharp object was driven into the underside of my upper arm instead. I think they thought they were leaving me there to die." Daljit reported that after the threats and beatings, his family felt so unsafe that he moved in with his sister in another city so that he could protect his parents, children, and wife (Symptom 1).

CRITERION B (Intrusion symptoms)

Symptoms (1), (2), (4), and (5).

Daljit reported he has recurrent intrusive memories of being beaten and threatened in India. He said, "I'll be thinking about my family and then I start reliving what happened to me – and think about what if this happens to my son, I feel it all over again." He said, "I don't want to avoid thinking of my family, but sometimes I have to in order to not see these pictures in my head of what happened to me" (Symptom B1). Daljit explained he has nightmares at least five times a week. He said, "I always feel like people are chasing me in my dreams. That they're beating me again, or I'm in a dark hole and can't get out, or I'm asking for help and no one is helping me. I feel like someone is strangling me or pushing on my chest. I'm trying to shout but can't. My roommate sleeps in the living room, the other night he said he could hear me shouting in my sleep. He came in my room to see if I was alright and he said that I looked like I was tied down and unable to move" (Symptom B2). Daljit cried throughout the interview, experiencing psychological distress to the content of our conversation. He explained "I cry every time I think about my family over there." When he thinks about what will happen to him, or what has happened to his father, he feels paralyzed and helpless. These feelings get in the way of him participating in life in a meaningful way such as sleeping well, eating well, and his ability to focus on the things he does have in his control like going to the temple, making friends, and exploring his neighborhood.

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Daljit explained, "Sometimes I feel like things are running so fast. I feel like people are speaking so loudly when they aren't, or people feel like they're moving very fast around me when they're not. This happens two to three times in a day. I feel like my head is spinning (Symptom B4). Daljit also experiences marked physiological distress at reminders of the events in India. As we talked his face became flushed, his heart rate increased as indicated by the quickening of his chest rising and falling. He clenched his body in a protective manner and explained "I feel like my heart is beating so fast, I try to take a breath but I cannot, it's hard. I feel like my chest is being compressed, I get hot" (Symptom B5). Daljit's statements are consistent with four of the five symptoms set forth in section B of the PTSD criteria defined by the APA.

CRITERION C (Avoidance)

Symptoms (1) and (2)

Daljit reported he tries to avoid distressing memories, thoughts, and feelings about his time in India. He explained, "I haven't told anyone anything about what has happened to me." He explained that he does everything he can to distract himself. He goes shopping and buys things he doesn't need, he'll cook. He reads the headlines in the news, but stays away from Indian politics. He said, "Mostly I like to read the news online, but I don't read anything about news in India. I follow US political and economic news." He cannot watch any violent TV or movies. He explained "I usually watch animated children's movies. They're hopeful and have a good message. My roommate says 'why do you watch this stuff for children?' But he could not understand" (Symptom C1). Daljit would like to avoid any external reminders of what happened to him, but it is difficult. He explained, "My roommate likes violent movies, but I just cannot watch this type of thing." He added that he avoids news about India because he doesn't want to be reminded." Daljit is Sikh and used to go to temple here. Unfortunately there was a shooting there recently and he is afraid to go back. He said, I have been going to temple, but last week I witnessed a fight between some of the members. There was a bullet shot. Also, I don't like to see the people with their families. It makes me so jealous and sad. (Symptom C2). Daljit's statements are consistent with two of the two symptoms set forth in section C of the PTSD criteria defined by the APA.

CRITERION D (Negative mood)

Symptoms (2), (4), (5), and (6)

Daljit has persistent and exaggerated negative beliefs about the world. He said, "I don't trust anybody anymore. I don't necessarily trust my lawyers." Daljit explained that sometimes he feels like he has let his family down. He said, "I am a coward. I just left them there. But I know if I'm alive at least then I can do something to help them"(Symptom D2). As indicated by Daljit's score of 13 out of 27 on the PHQ-9, he experiences a persistent negative emotional state. He endorsed having "more than half of the days" of feeling down, depressed, and hopeless; little interest or pleasure in doing things, feeling tired or having little energy. Additionally, he endorsed having trouble falling asleep, under eating, feeling bad about himself – like he's a failure and let his family down, and moving or speaking more slowly than he used to (Symptom D4, D5). Additionally, he stated he feels detached from others. He said, "I don't really have friends. I have my roommate. I have acquaintances from the temple, but I see them all there with their families. I feel so jealous and alone when I'm with other people" (Symptom D6). Daljit's statements are consistent with five of the seven symptoms set forth in section D of the PTSD criteria defined by the APA.

CRITERION E (Arousal)

Symptoms (1), (4), (5), and (6)

Daljit explained that he has felt more irritable than he used to. He said, "Sometimes I get mad at my roommate for no reason. I went to his work [at a convenience store] before he got off work. I got all mad at him because I felt like he was ignoring me. I just left and went home and was short with him when he came home (Symptom E1). Daljit reported he sometimes feels jumpy. He said, "It's more when I've been sleeping, usually after dreaming about India." He added, "I'm jumpy, but it's not too much. I feel really safe here. It's worse at night" (Symptom E4). Daljit has problems with concentration. He said, "I try to watch TV or movies but I just can't pay attention to it. I find that I'm thinking about other stuff. When I'm working I can concentrate. When I'm at home or don't have anything to do that's when I think about it [the beatings and threats] all the time. I don't really have any friends because I don't think anyone can understand what I'm going through. It's really hard for me to trust people." He added, "When someone is talking to me I lose track of what they are saying."

On the PTSD symptom scale he indicated having difficulty concentrating more than half of the time in a two week period. (Symptom E5). Daljit explained he experiences great disturbance in his sleep. He said, "I sleep horribly. I can't fall asleep. Last night I fell asleep at 3:30 and woke up at 8. When I sleep I always dream that I'm in India. In general I go to bed around 10, but don't fall asleep till 2 or so. (Symptom E6). Daljit's statements are consistent with four of the six symptoms set forth in section E of the PTSD criteria defined by the APA.

CRITERION F (Duration)

Daljit reported these symptoms began immediately after the first beating he experienced in January of 2010. He reports his symptoms have changed since living in the United States as he generally feels safer and is no longer hypervigilant or as easily startled as he was in India.

CRITERION G (Significant distress)

Daljit experiences significant distress from his symptoms. He has poor sleep. Sleep disturbances are common with people who have PTSD. When people do not sleep through the night, their brains do not have the opportunity to properly rest and affects their mental functioning the next day. Prolonged lack of sleep can lead to other functional disruptions like the inability to work or complete daily tasks of living. Daljit has difficulty eating, which is additionally harmful for his health due to his diabetes. Poor concentration could present danger for him in his employment as a long distance truck driver.

CRITERION H (Other physiological effects)

Daljit reported he takes medication to manage his diabetes. He reported he does not use drugs or alcohol.

CONCLUSION

In 2010, Daljit was attacked by a group of men unhappy with his participation in social work. They threatened to kill him. A month later men found him at his home and threatened to kill him again. One month after that he was badly beaten again. He feared for his life and had to leave his wife and three children to seek refuge. He has problems with sleep and concentration. He is affected by a persistent negative mood and avoidance behaviors.

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In my professional experience, his symptoms are consistent with his stated experiences and these symptoms positively indicate that Daljit suffers from Post Traumatic Stress Disorder (309.81). Daljit is trying to begin his life again, and must first have a consistent period of time where he feels safe. Without a sense of safety, it is likely his symptoms will continue to worsen and make it difficult for him to fulfill functional needs of daily life such as sleeping, working, and concentrating. I gave Daljit some relaxation techniques to learn to fall asleep. I believe Daljit would benefit greatly from ongoing counseling to develop coping skills so that he may reduce symptoms to live a more full life. I encouraged him to reengage with his temple and his roommate as they can offer a sense of camaraderie and safety that will assist him in his recovery.

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JTS

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Allison Ramsey, MS, LMHC
Allison Ramsey, MS, LMHC

3/20/15

March 20, 2015

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SFB

Exhibit 52

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QUESTIONS FOR INDIAN NATIONALS IN ERO CUSTODY

1. **FULL NAME:** Singh, Daljit A200893771
(Last Name/Sur name, Middle Name, First Name)
2. **ALIAS:** -
3. **PREVIOUS NAME:** -
(Only if you have changed your name)
4. **MAIDEN NAME:** -
(For married, widowed, or divorced female)
5. **FATHER'S NAME, DETAILED ADDRESS AND OCCUPATION:**
Singh, Mohinder, Khansiam Rd, V.P.O Sanour Tehh & Distt Patialia, Punjab;
Farmer, 919876218344

(If father or mother is deceased, still provide as much information as possible)
6. **MOTHER'S NAME, DETAILED ADDRESS AND OCCUPATION:**
Kaur, Manjit; Housewife
7. **DATE AND PLACE OF BIRTH** (Include as much detail as possible for place of birth): 04/18/1981; Patiala (Sanour)
8. **WHETHER MARRIED (YES OR NO) IF YES, NAME OF SPOUSE:** Yes,
Kaur, Navdeep; Address same
9. **EDUCATION DETAILS IN INDIA:**
SCHOOL: Govt High School Sanour
YEAR: 10 + 2
QUALIFICATION: _____
COLLEGE: _____
UNIVERSITY: _____
10. **WHAT WAS YOUR OCCUPATION BEFORE LEAVING INDIA? WHO WAS YOUR EMPLOYER? GIVE DETAILS ALONG WITH ADDRESS**
Supervisor Aditya Birla Retails Ltd
11. **PRESENT OCCUPATION:** Same
12. **IDENTIFYING FEATURES:**
 - a. HEIGHT: 5' 4"
 - b. COLOR OF EYES: Brown
 - c. COLOR OF HAIR: Black

d. DISTINGUISHING MARK: Lion tattoo on left shoulder

13. PERMANENT ADDRESS IN INDIA:

(See attached flow chart of administrative structure of India)

FOR RURAL AREA

- a) NAME OF VILLAGE: Sanour
- b) NAME OF POST OFFICE: Sanour
- c) NAME OF TEHSIL: Patiala
- d) NAME OF POLICE STATION: Patiala
- e) NAME OF AREA: Patiala
- f) NAME OF DISTRICT AND STATE: Patiala (Punjab)
- g) TELEPHONE NUMBER: _____

FOR URBAN AREA

- a) HOUSE NUMBER: _____
- b) WARD NUMBER OR GALI: _____
- c) NAME OF CITY: _____
- d) NAME OF POLICE STATION: _____
- e) NAME OF DISTRICT: _____
- f) NAME OF STATE: _____
- g) TELEPHONE NUMBER: _____
- h) OTHER ADDRESSES IN INDIA IF ANY: _____

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14. NAME, TELEPHONE NUMBER, ADDRESS AND TELEPHONE OF TWO RESPECTABLE/REPUTED/WELL-KNOWN PERSONS OF THE AREA e.g. SARPANCH, PANCH OF THE VILLAGE, MUNICIPAL SCHOOL MASTER, POSTMAN, COUNSULAR OF CITY AND OTHER RESPECTABLE PERSON FOR REFERENCE. (Subject should know several respectable people or well known people in the local community. The Sarpanch is the village leader)

Town Mayor: Nuranjan Singh

Vice Mayor: Prakash Singh

15. IDENTITY DOCUMENTS : (If subject is not able to provide any documentation or what happened to it, this may be a good lead in to how he was smuggled into the U.S. Subject had to have had some type of document to travel).

- a) Do you have any form of identification documents here in the United States or back in your home country?
Only at home
- b) (if yes) Exactly what kind of identification documents do you have? (National ID Card, Birth Certificate, Drivers License, etc)
Driver license, voter card and ration card
- c) Where are those documents now? (be as specific as possible)
Home India
- d) (if no identity documents anywhere) Are you telling me that you have never obtained any identification documents in your home country? No
- e) Drivers license number, date and place of issuance?
2008 Patiala
- f) Passport number, date and place of issue? (Newer passports are in a central database and should be easy to verify if have passport number (key date is 1998)? 2002 Chandigarh, It was snatched in Mexico, it was at night
- g) Voter identity card number and date? 2008 Patiala
- h) Ration card details? Family name 2007
- i) School Certificate? 2009 Govt. High School Sanour
- j) Bank Account Number? HDFC Private Ltd.
- k) Any other document to prove identity? No

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16. DETAILS OF LEAVING INDIA:

- a) Date of Departure? 9/28/2010
- b) Authorized/Unauthorized Route? Authorized Visa to Dohar, Qatar
- c) Place of Departure from India? Delhi
- d) Mode of Travel (Flight number and name of airlines)? (You can also expand on this for information on the smuggling route)
Delhi-Dohar-Sao Paolo, Brazil-Lima, Peru-Quito, Ecuador-Costa Rica-Guatemala- Mexico by boat

17. DETAILS OF SMUGGLING:

- a) Did you use a smuggler to bring you to the United States?
Yes, Bhart
- b) How much did the smuggler charge you? \$8,000 dollars, will pay 2k in Houston to a man we met in Laredo, 25 yrs old, defined beard, and with a left earring
- c) Have you paid the full smuggling fee already? Yes
- d) How are you planning to pay off the smuggling fee? (if fee not paid yet) Paid
- e) Did the smuggler provide you with fraudulent travel documents to come to the United States? I don't know
- f) Are you absolutely sure you did not use a smuggler to bring you to the United States? -

18. TRAVEL DOCUMENTS:

- a) Have you ever applied for a visa to come to the United States?
-
- b) (if yes) When did you apply for the visa? (be as specific as possible: month, day, year) -
- c) What type of visa did you apply for? (Tourist visa, student visa, etc.) -

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- d) Why did you apply for the visa? _____ - _____
- e) Was your visa application denied? _____ - _____
- f) (if no) Are you absolutely sure that you've never applied for a visa to come to the United States? _____ - _____

19. FAMILY OR FRIENDS IN THE UNITED STATES:

- a) Do you have any family or friends in the United States? Who? (if yes) The follow-up questions should be asked about each person listed) Yes, Friends
- b) How exactly are you related to him/her (be specific as you can) Father's friend
- c) Where does this person live? California
- d) What is this person's status in the United States? (illegal, LPR, USC) LPR
- e) If released from custody, will you stay with that person? (if not with that person, then where and with whom do you plan on staying if released from immigration custody)? Bharpur Singh in California
- f) Have you already made arrangements with that person regarding being able to stay with him/her? No
- g) (if no family or friends in the U.S): Are you absolutely sure about that? Then where and with whom do you plan on staying if released from immigration custody?

20. NAME, ADDRESS AND TELEPHONE NUMBER OF TRAVEL AGENT OR ANY OTHER PERSON/AGENCY INVOLVED IN SENDING THE INDIVIDUAL ABROAD. (If subject used some form of legitimate travel assistance record information here.) _____ - _____

21. WHAT IS YOUR FINAL DESTINATION IN THE UNITED STATES?

(Provide full address, phone number, and Point of Contact). California

22. TERRORIST DISCLAIMER:

No link

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Exhibit 53

Record of Determination/Credible Fear Worksheet

HLG	<u>ZHN</u>	200 893 771	<u>SINGH</u>
District Office Code	Asylum Office Code	Alien's File Number	Alien's Last/ Family Name
<u>Powell</u>	<u>Clifton</u>	<u>India</u>	
Asylum Officer's Last Name	Asylum Officer's First Name	Alien's Nationality	

All statements in italics must be read to the applicant

SECTION I:

INTERVIEW PREPARATION

- 1.1 12/20/2010
Date of arrival [MM/DD/YY]
- 1.2 At or near Laredo, TX
Port of arrival
- 1.3 12/22/2010
Date of detention [MM/DD/YY]
- 1.4 Wilson Detention Center 1800 Industrial Drive Raymondville, Texas 78580
Place of detention
- 1.5 12/23/2010
Date of AO orientation [MM/DD/YY]
- 1.6 _____
If orientation more than one week from date of detention, explain delay
- 1.7 1/5/2011
Date of interview [MM/DD/YY]
- 1.8 Raymondville, TX
Interview site
- 1.9 Applicant received and signed Form M-444 and relevant *pro bono* list on 12/23/2010
Date signed [MM/DD/YY]
- 1.10 Does applicant have consultant(s)? Yes No
- 1.11 If yes, consultant(s) name, address, telephone number and relationship to applicant

- 1.12 Persons present at the interview (check which apply)
- 1.13 Consultant(s)
- 1.14 Other(s), list: _____
- 1.15 No one other than applicant and asylum officer
- 1.16 Language used by applicant in interview: Punjabi
- 1.17 Lionbridge #1975003 Yes No 7:45 9:09
Interpreter Service, Interpreter ID Number. Interpreter Has Forms Time Started Time Ended
- 1.18 Lionbridge # Yes No _____ _____
Interpreter Service, Interpreter ID Number. Interpreter Has Forms Time Started Time Ended
- 1.19 _____ Yes No _____ _____
Interpreter Service, Interpreter ID Number Interpreter Has Forms Time Started Time Ended
- 1.20 Interpreter was not changed during the interview
- 1.21 Interpreter was changed during the interview for the following reason(s):
- 1.22 Applicant requested a female interpreter replace a male interpreter, or *vice versa*
- 1.23 Applicant found interpreter was not competent
- 1.24 Applicant found interpreter was not neutral
- 1.25 Officer found interpreter was not competent
- 1.26 Officer found interpreter was not neutral
- 1.27 Bad telephone connection
- 1.28 Asylum officer read the following paragraph to the applicant at the beginning of the interview:

The purpose of this interview is to determine whether you may be eligible for asylum or protection from removal to a country where you fear persecution or torture. I am going to ask you questions about why you fear returning to your country or any other country you may be removed to. It is very important that you tell the truth during the interview and that you respond to all of my questions. This may be your only opportunity to give such information. Please feel comfortable telling me why you fear harm. U.S. law has strict rules to prevent the disclosure of what you tell me today about the reasons why you fear harm. The information you tell me about the reasons for your fear will not be disclosed to your government, except in exceptional circumstances. The statements you make today may be used in deciding your claim and in any future immigration proceedings. It is important that we understand each other. If at any time I make a statement you do not understand, please stop me and tell me you do not understand so that I can explain it to you. If at any time you tell me something I do not understand, I will ask you to explain.

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[Signature]
HT

SECTION II:

BIOGRAPHIC INFORMATION

2.1 SINGH

Last Name/ Family Name (ALL CAPS)

2.2 Daljit

First Name

2.3 _____

Middle Name

2.4 4/18/1981

Date of birth (MM/DD/YY)

2.5 Gender male

2.6 None

Other names and dates of birth used

2.7 India

Country of birth

2.8 India

Country (countries) of citizenship (list all)

2.9 India

Address prior to coming to the U.S. (List Address, City/Town, Province, State, Department and Country).

2.10 Kamboj Sikh 2.11 Sikh

2.12 Punjab

Applicant's race or ethnicity Applicant's religion All languages spoken by applicant

2.13 Marital Single Married Legally separated Divorced Widowed status:

2.14 Did spouse arrive with applicant? Yes No

2.15 Is spouse included in applicant's claim? Yes No

2.16 If currently married (including common law marriage) list spouse's name, citizenship, and present location (if with applicant, provide A-Number):

Nahib Kaur, India living in India

2.17 Children: Yes No

2.18 List any children (Use the continuation section to list any additional children):

Date of birth (MM/DD/YY)	Name	Citizenship	Present location (if w/PA, list A-Numbers)	Did child arrive with PA?	Is child included in PA's claim?
<u>09/09/01</u>	<u>Indipal Singh</u>	<u>India</u>	<u>India</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>01/26/03</u>	<u>Gudrilin Kaur</u>	<u>India</u>	<u>India</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
_____	_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
_____	_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
_____	_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

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2.19 Does applicant claim to have a medical condition (physical or mental), or has the officer observed any indication(s) that a medical condition exists? If YES, answer questions 2.20 and 2.21 and explain below. Yes No

2.20 Has applicant notified the facility of medical condition? Yes No

2.21 Does applicant claim that the medical condition relates to torture? Yes No

2.22 Does the applicant have a relative, sponsor or other community ties, including spouse or child already listed above? Yes No

2.23 If YES, provide information on relative or sponsor (use continuation section, if necessary):

Dharpur Singh

Father's friend

Name

Relationship

California

Unknown

Address

Telephone Number

Citizen Legal Permanent Resident Other

SECTION III:

CREDIBLE FEAR INTERVIEW

THE FOLLOWING NOTES ARE NOT A VERBATIM TRANSCRIPT OF THIS INTERVIEW. THESE NOTES ARE RECORDED TO ASSIST THE INDIVIDUAL OFFICER IN MAKING A CREDIBLE FEAR DETERMINATION AND THE SUPERVISORY ASYLUM OFFICER IN REVIEWING THE DETERMINATION. THERE MAY BE AREAS OF THE INDIVIDUAL'S CLAIM THAT WERE NOT EXPLORED OR DOCUMENTED FOR PURPOSES OF THIS THRESHOLD SCREENING.

The asylum officer must elicit sufficient information related to both credible fear of persecution and credible fear of torture to determine whether the applicant meets the threshold screening. Even if the asylum officer determines in the course of the interview that the applicant has a credible fear of persecution, the asylum officer must still elicit any additional information relevant to a fear of torture. Asylum officers are to ask the following questions and may use the continuation sheet if additional space is required. If the applicant replies YES to any question, the asylum officer must ask follow-up questions to elicit sufficient details about the claim in order to make a credible fear determination.

3.1 a. Have you or any member of your family ever been mistreated or threatened by anyone in any country to which you may be returned?

Yes No

See Q & A

b. Do you have any reason to fear harm from anyone in any country to which you may be returned?

Yes No

See Q & A

c. If YES to questions a and/or b, was it or is it because of any of the following reasons? (Check each of the following boxes that apply).

Race Religion Nationality Membership in a particular social group Political Opinion

3.2 At the conclusion of the interview, the asylum officer must read the following to applicant:

297 286 #6

If the Department of Homeland Security determines you have a credible fear of persecution or torture, your case will be referred to an immigration court, where you will be allowed to seek asylum or withholding of removal based on fear of persecution or withholding of removal under the Convention Against Torture. The Field Office Director in charge of this detention facility will also consider whether you may be released from detention while you are preparing for your hearing. If the asylum officer determines that you do not have a credible fear of persecution or torture, you may ask an Immigration Judge to review the decision. If you are found not to have a credible fear of persecution or torture and you do not request review, you may be removed from the United States as soon as travel arrangements can be made. Do you have any questions? YES NO

- 3.3 At the conclusion of the interview, the asylum officer must read a summary of the claim, consisting of the responses to Questions 3.1 a-c and information recorded in the Additional Information/Continuation section, to applicant.

****Typed Question and Answer (Q&A) interview notes and a summary and analysis of the claim must be attached to this form for all negative credible fear decisions. These Q&A notes must reflect that the applicant was asked to explain any inconsistencies or lack of detail on material issues and that the applicant was given every opportunity to establish a credible fear.

SECTION IV:

CREDIBLE FEAR FINDINGS

A. Credible Fear Determination:

Credibility

- 4.1 There is a significant possibility that the assertions underlying the applicant's claim could be found credible in a full asylum or withholding of removal hearing.
- 4.2 Applicant found not credible because (check boxes 4.3-4.5, which apply):
- 4.3 Testimony was internally inconsistent on material issues.
- 4.4 Testimony lacked sufficient detail on material issues.
- 4.5 Testimony was not consistent with country conditions on material issues.

Nexus

- 4.6 Race 4.7 Religion 4.8 Nationality 4.9 Membership in a Particular Social Group
(Define the social group): _____
- 4.10 Political Opinion 4.11 Coercive Family Planning [CFP] 4.12 No Nexus

Credible Fear Finding

- 4.13 Credible fear of persecution established.
OR
- 4.14 Credible fear of torture established.
OR
- 4.15 Credible fear of persecution NOT established and there is not a significant possibility that the applicant could establish eligibility for withholding of removal or deferral of removal under the Convention against Torture.

B. Possible Bars:

- 4.16 Applicant could be subject to a bar(s) to asylum or withholding of removal (check the box(es) that applies and explain on the continuation sheet):
- 4.17 Particularly Serious Crime 4.18 Security Risk 4.19 Aggravated Felon
- 4.20 Persecutor 4.21 Terrorist 4.22 Firmly Resettled
- 4.23 Serious Non-Political Crime Outside the United States
- 4.24 Applicant does not appear to be subject to a bar(s) to asylum or withholding of removal.

C. Identity:

- 4.25 Applicant's identity was determined with a reasonable degree of certainty (check the box(es) that applies):
- 4.26 Applicant's own credible statements. (If testimony is credible overall, this will suffice to establish the applicant's identity with a reasonable degree of certainty).
- 4.27 Passport which appears to be authentic.
- 4.28 Other evidence presented by applicant or in applicant's file (List): _____
- 4.29 Applicant's identity was not determined with a reasonable degree of certainty. (Explain on the continuation sheet.)

388 387 719

ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45

Stop: 9:09

QUESTIONS & ANSWERS

INTERVIEW INITIATED: 7:45

OATH ADMINISTERED

PARAGRAPH 1.28, FORM I-870, READ TO APPLICANT

Background and I-870 Information

Q. Do you have an attorney / consultant to represent you?

A. I don't have one right now but if I need one I will hire one later

Q. Are you willing to proceed without having an attorney / consultant present?

A. Yes

Q. What is your full name?

A. Daljit Singh

Q. Have you ever been known by any other names or aliases?

A. No only this name

Q. Where were you born?

A. Patiana, India

Q. When were you born?

A. 04/18/81

Q. Have you ever used a different birth date?

A. No never

Q. Are you a citizen of India?

A. Yes

Q. Are you a citizen of any other countries?

A. No only from India

Q. Do you speak any other languages?

A. I know Hindi a little bit and English I can understand but not speak

Q. What is your race or ethnicity?

A. Kamboj Sikh

Q. What is your religion?

A. Sikh

Q. When did you last enter the United States?

A. 12/22/10

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H.F.

ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45 Stop: 9:09

Q. Where did you enter the United States?

A. Laredo

Q. Was this the first time you entered the United States?

A. This is the first time I came out in my country and this is the first time I entered the US

Q. Where were you apprehended?

A. I am not confirmed of the place where we were apprehended but we were on the highway and going someplace and the police came and got us

Q. When where you apprehended?

A. 12/22

Q. Do you have any medical conditions that we should know about?

A. No nothing

Q. Are you married or single? (name, citizenship, present location)

A. Married Nabib Kaur India, India

Q. Do you have any children? (Names, date of birth, citizenship, present location).

A. Yes I have two children

Indipal Singh, 09/09/01, India, India

Gudrillin Kaur, 01/26/03, India, India

Q. Do you have any family in the US? (Name / Address / Relationship / Telephone / status?)

A. No I don't have any family

Q. Do you have any contacts here in the US?

A. Yes my father's friends live here I don't have his telephone number but he lives in California his name is Dharpur.Singh he is a permanent resident here

Substantive Facts Questions

Q. Where did you live before you came to the U.S.?

A. In India

Q. What did you do for a living there?

A. I was doing a travel job and I was doing social work

Q. Have you lived in any other countries?

A. No this is the first time I came out from India

Q. Why did you leave India?

A. I was doing social work that's why my life was threatened by the other party

Q. What was the other party?

A. One was congress party and the other one was the Sarsewala Party

Q. When were you first threatened?

A. I was not threatened the first time I was beaten up in January

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ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45 Stop: 9:09

Q. When in January was that?

A. 28

Q. What year was it?

A. 2010

Q. Who beat you up?

A. They were both together from Congress party and from Sarsewala because they both work together

Q. How many people were there that beat you up?

A. There were four or five of them I was coming back from In-Laws village

Q. What did they beat you with?

A. They beat me with their hands and they threw me to the ground and they kicked me

Q. How long did they beat you for?

A. for four or five minutes and then some people were coming from one side and they ran away

Q. Did they say anything to you while they were doing this?

A. Yes

Q. What were they saying?

A. They were telling me to stop doing this social work because we don't benefit from this and to stop being a social worker and join our party otherwise we will kill you

Q. Why didn't they want you to do social work?

A. My job was to help keep details of those poor women who were getting married and getting some poor women stitching machines for Harbhajan Singh Kassmiri who was the leader of Patiana

Q. Why would these people want you to not do that?

A. Because with this kind of work our party gets popular and they lose votes because they were not doing these kinds of things

Q. What party were you a member of?

A. I am a member of Akali Dal Amritsar

Q. Did anything else happen to you in India after that?

A. Yes

Q. What happened?

A. Then on February 25th they came to my house and they threatened me

Q. What did they say?

A. Because they knew that I am going to take part March 5th in some program there was a cultural program there they told me not to take part in that and not to take any details for them

Q. How many people came to your house to tell you this?

A. I was not home but my family told me there were two or three people

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+29

ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45 Stop: 9:09

Q. Did they say what would happen if you participated in this program?

A. They told that last time you survived but this time you are not going to survive

Q. Did anything else happen to you in India?

A. Yes after that again something happened

Q. What happened next?

A. I was coming back from my job in the night time it was about 11 or 11:30

Q. What happened?

A. My village is about 10 or 12 kilometers from that city and it is kind of a deserted place and that's when those men stopped me

Q. What did they do to you?

A. The policeman stopped me and four or five people came out from the field and they started beating me and they threw me on the ground

Q. A policeman stopped you?

A. Yes that man was wearing a uniform of a policeman

Q. Did these people say anything while they were beating you?

A. They told me you went against our party and now you will see the consequences of going against us

Q. What did they beat you with?

A. They had Latsi and they are beating me with that and they threw me down and were beating me with that and my little finger broke and they hit me with something sharp and on my arm there was a deep wound there

Q. How long did they do this for?

A. This was away from the main road and for 10-15 minutes they were beating me

Q. Why did they stop?

A. The one guy maybe he was watching maybe for people in the night time he heard some noises and they got scared and ran away

Q. When did all this happen?

A. 11:00 or 11:30 in the night time

Q. What was the date?

A. 17th

Q. What months and year?

A. It was march 17th 2010

Q. Did anything happen to you after that?

A. After that the guy who came from the field he took me to the main road and then to the clinic and then he called my family

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ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45 Stop: 9:09

Q. Did you suffer any harm in India after this incident?

A. After that my family member told me to live with my sister and they told me you cannot live here anymore safe you have too many enemies so leave this place

Q. Then where did you go?

A. For two or three months I lived with my brother in law and then he sent me to Delhi

Q. How long did you live there?

A. There I stayed a little more than one month

Q. Where did you go from there?

A. From there I got a visa for Ecuador and I went to Ecuador

Q. Is that when you began your journey to the US?

A. Yes since I am the only son in my family my parents only have two other daughters and so my family told me to come here

Q. For the months that you lived in India after that incident were you harmed during that time?

A. We live away from the main population and my family was always on alert and they were taking care of anyone who came near the house many times they were around my house and my family saw them and maybe they thought I would go back to my family

Q. For the months that you lived in India after that incident were you harmed during that time?

A. At that time I was staying with my sister and they lived far from my village

Q. For the months that you lived in India after that incident were you harmed during that time?

A. No nothing happened after that because I was not living in my village

Q. What do you think will happen to you if you are returned to India?

A. If I go back these Sarsewala party and congress party they are going to kill me and this Sarsewala they have too many charges on them already

Unable or Unwilling to Control

Q. Have you ever made any attempts (past) to seek protection of your government?

A. The Punjab government cannot give me any support and in the central congress rules so they will not give me any support and the MLA of our area he belongs to congress and any election he wins

Q. Did you ever call the police?

A. I went to the police and the police didn't do anything because the police are under the control of MLA which is congress and Sarsewala he has so many criminal records because he supports criminal party and the Sarsewala party they always vote for congress

Q. What did they police say when you went to them?

A. When I went to complain they said you are an ordinary man so don't try to do these parties what you have to do is leave your party and don't do these things

Q. Do you know of anyone else who has been harmed similarly to you who has called the police?

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ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45

Stop: 9:09

A. Many people go to the police but the police doesn't do anything because they are corrupt and they listen only to those in power

End of Interview Questions

Q. Did you use a smuggler to bring you to the United States?

A. There was a man from Mexico he brought us here

(if yes): How much did the smuggler charge you?

He took three thousand in Mexico and he was supposed to take two thousand when we reached Houston

(if yes): Did the smuggler arrange for you to have an attorney here in the United States?

No his goal was to reach Houston and he said after that you are on your own

Q. Do you recall being interviewed by the Border Patrol on 12/23/10?

A. In the evening we were apprehended and in the night time they took my interview

Q. Do you remember if you were placed under oath or promised to tell the truth at that time?

A. Yes I did

Q. Why did you tell the Border Patrol interviewer that you would be harmed because of your religion and you didn't tell him about any of this social work you have told me about?

A. I was very tired at that time and since three days we had been walking I was very tired and because my whole body was in bad condition and they told us whatever you want to tell us in the interview you can tell us

Q. Why did your entire claim change between then and now?

A. No I have not changed it because Sarsewala is against our religion and because they are against our religion they did that harm

Q. You told me that was because you were doing social work you didn't say anything about religion until I asked you why is that?

A. I remember also Gujrati community and our party is also religious and whatever we do we do according to our religion

Q. Aside from what we've discussed, do you have any other problems in India?

A. This Sarsewala Baba he is against our religion and he tries to copy our religion and when they beat me up they pulled my hair also and so everything comes between our religion and politics and Anderra Baba he tries to burn our religious book and there is no action taken against him and they are all trying to finish our religion and if you speak against them they do to you like they did to me

Q. Did he try to burn your personal copy of the religious book?

A. They tried to burn our Holy book

Q. Where did he get this copy of your holy book?

A. They were taken from the Gujwara there was an order from the supreme leader's court that no holy book will be given to the Sarsewala members

Q. Do you fear that you might be tortured if you return to your country?

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ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45 Stop: 9:09

A. Yes definitely they will torture me they did these things before ad they are trying to finish our religion also

Q. Who would do that to you?

A. Sarsewala and the congress because there is no action taken against the Sarsewala and they are worse than the congress

Q. Why would they do that to you?

A. Because I relate to Sikh religion and he is against our religion and if I protest against him they will torture us

Q. Do you fear that anyone from the government of India or anyone acting with the consent or acquiescence of a public official there will intentionally harm you physically or mentally for any reason?

A. No because the congress party is the one that rules and they are not going to take any action against Sarsewala there were riots in 84 and congress didn't do anything at that time for the Sikhs

Q. Have you ever persecuted harmed or hurt another human being?

A. No because I am doing everything that my party is doing in a peaceful way

Q. Have you ever been arrested for anything in any country?

A. Yes once I was arrested

Q. What were you arrested for?

A. We were protesting against Sarsewala and the police arrested us and after a while they released us

Q. How long were you held?

A. They were arresting us because they didn't want us to protest in a peaceful way and in that evening they were letting us go

Q. How were you treated during your detention?

A. They were just keeping us in a room and telling us what you have to do with politics and not to keep living like that

Q. Did you have a permit to protest at that time and place?

A. In India nobody takes a permit there is only permission from the committee

Q. Did you have such permission?

A. That was an order from our supreme religious court that whosoever goes against our religion we shall demonstrate against them and they shall not be given our holy book

Q. Have you ever been affiliated with, supported, or assisted a group that has been accused of using violence to realize its goals?

A. No

Q. Do you intend to participate in espionage while you are inside the US?

A. No

Q. Do you think you could live safely in any area of India?

ALIEN NUMBER: A 200 893 771

DATE: 1/5/2011

NAME: Daljit Singh

ASYLUM OFFICER: Clifton Powell ZHN085

COUNTRY: India

Lionbridge#1975003

ASYLUM OFFICE: ZHN

Start: 7:45 Stop: 9:09

A. No congress party rules all of India and they do these things all over India

Q. Why not given that you lived for several months in another area without harm?

A. I was living inside in my sister's house and when I went to Delhi I went out in the night time

Q. Do you think anyone from the government of India could protect you?

A. No because India is not for the Sikhs and what happened to us in 84 they have done nothing and they if they wanted to help us they could have done something by now

Q. Is there anything else that you would like to add that you think we have not covered today?




A. India they claim to be a democratic country but there is no democracy sometimes the Christians are treated badly sometimes the Muslims are and last year the Muslims had problems there

PARAGRAPH 3.2, FORM I-870, READ TO APPLICANT

INTERVIEW CONCLUDED: 9:09

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156

Exhibit 54

Family Name (CAFS) SINGH, DALJIT		First	Middle	Sex M	Hair BLK	Eyes BRO	Complexion MED
Country of Citizenship INDIA	Passport Number and Country of Issue	File Number CASE No: CAR1112000069 A200 893 771		Height 65	Weight 195	Occupation LABORER	
U.S. Address				Scars and Marks LION			
Date, Place, Time, and Manner of Last Entry 12/20/2010, 1600, 41 mile(s) NW of LCB, PMA (AFOOT)			Passenger Boarded at	F.B.I. Number 587137KD4		<input type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated	
Number, Street, City, Province (State) and Country of Permanent Residence KHANSIAN ROAD PATIALA, PUNJAB, INDIA PATIALA, PUNJAB, INDIA				Method of Location/Apprehension PB			
Date of Birth 04/18/1981	Age: 29	Date of Action 12/22/2010	Location Code DRT/CAR	At/Near CARRIZO SPRINGS, TX		Date/How 12/22/2010 2130	
City, Province (State) and Country of Birth PATIALA, PUNJAB, INDIA		AR <input checked="" type="checkbox"/> Form: (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>		By See Narrative			
NIV Issuing Post and NIV Number		Social Security Account Name					
Date Visa Issued		Social Security Number					
Immigration Record NEGATIVE			Criminal Record None Known				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate) See Narrative				Number and Nationality of Minor Children TWO INDIA			
Father's Name, Nationality, and Address, if Known See Narrative			Mother's Present and Maiden Names, Nationality, and Address, if Known See Narrative				
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks See Narrative	Charge Code Word(s) I7A1			
Name and Address of (Last) Current U.S. Employer		Type of Employment	Salary	Employed from/to Hi			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) FINS #: 1112960200							
							
ARREST COORDINATES:							
Latitude: 28.5852							
Longitude: -99.6788							
ARRESTING AGENT:							
JOEL MC CRAW							
ERIC FLORES							
Alien has been advised of communication privileges		EF 12/23/10 (Date/Initials)		ERIC FLORES BORDER PATROL AGENT (Signature and Title of Immigration Officer)			
Distribution:		Received: (Subject and Documents) (Report of Interview)					
		Officer: ERIC FLORES					
		on: December 22, 2010 at 2257 (time)					
		Disposition: Expedited Removal with Credible Fear					
		Examining Officer: FERNANDO BERMEJ					

52

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Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
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BRETT SOWERS
BRYAN GREW

SPOUSE NAME AND ADDRESS:

Nationality: **INDIA KAUR, NAVDEEP**
PATIALA, PUNJAB, INDIA

FATHER NAME AND ADDRESS:

Nationality: **INDIA MOHINDER**
KHANSIAN ROAD
PATIALA, PUNJAB, INDIA

MOTHER NAME AND ADDRESS:

Nationality: **INDIA MANJIT**
KHANSIAN ROAD
PATIALA, PUNJAB, INDIA

ASSISTING ASSETS:

Scopes

FUNDS IN POSSESSION:

United States Dollar .00

+ Daljit

RECORDS CHECKED:

-
- CIS Negative
- CLAIM Negative
- EARM Negative
- IAPIS Negative
- IBIS Negative
- NAILS Negative
- NIIS Negative
- SEVIS Negative

EF

NARRATIVE:

ENCOUNTER:

SUBJECT SINGH, Daljit (A# 200 893 771) was encountered by Border Patrol Agents in an Alien Smuggling load near Brundage, Texas on December 22, 2010 at approximately 8:00 p.m. At

Signature  ERIC FLORES	Title BORDER PATROL AGENT
--	-------------------------------------

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000326

300 *899*

Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
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the time of apprehension the SUBJECT was wearing soiled clothing and was emitting a strong body odor. He also had small cuts and scratches on his arms and had grass and small sticks stuck to his hair and clothing. These characteristics are consistent with illegal aliens who have been walking through the brush for several days in order to avoid apprehension. SUBJECT was asked by Border Patrol Agents in the English language to state his citizenship. SUBJECT stated he was a citizen of India and freely admitted to being illegally present in the United States. At this time SUBJECT was placed under arrest and transported to the Carrizo Springs Border Patrol Station for further processing.

ADVISAL OF RIGHTS/JURAT I-867A:

At the Border Patrol Station, SUBJECT was advised of his rights as per form I-867A in the Punjabi, Language interpreted by Language Line Services representative Juliet #1575. SUBJECT stated he understood his rights and that he was willing to answer questions.

ALIENAGE/TRAVEL DATA:

SUBJECT departed his hometown in Patiala, Punjab, India sometime in October of 2010. SUBJECT flew from New Delhi, India to Sao Paulo, Brazil on Qatar Airlines. From Saul Paulo, Brazil he flew to Lima, Peru on Daca Airlines and from there he flew to Quito, Ecuador. From Ecuador he flew to Guatemala City, Guatemala on Daca Airlines. Subject claims to have reached Guatemala City on or about November 1st. Subject stayed in a hotel for six to seven days. On or about November 7th, subject claims to have reached Tapachula, Mexico via bus. Subject claims to have traveled alone to the Mexico/Guatemala Border. An unknown person took the subject and some other individuals whom he had met from Guatemala, to his personal house in Tapachula, Mexico before sending them to the Madrid Hotel in Tapachula, Mexico. The subject left Tapachula, Mexico with a smuggler named "Donker" who blindfolded them, and took them by vehicle to Mexico City, Mexico. The subject stayed in Mexico City, Mexico for two to three days before departing on a bus to Nuevo Laredo, Tamaulipas, Mexico. When arriving to Nuevo Laredo, Tamaulipas, Mexico, the subject was taken to a brick house near a railroad track, where he and other individuals stayed for two to three days before the smugglers came back. When the smugglers arrived, they were taken to the bus station in Nuevo Laredo, Tamaulipas, Mexico and driven north to an unknown location near the US/Mexico border. Subject was dropped off and walked to the river to cross into the United States. Subject claims that there were a total of 14 individuals at the river who crossed into the US with him. Subject illegally crossed the Rio Grande River into the United States approximately 41 miles northwest of the Laredo Colombia Bridge Port of Entry in Laredo, Texas at a place not designated as a port of entry by the Attorney General or the Commissioner of the Department of Homeland Security. Subject stated the he walked through the brush along with fourteen other individuals for approximately three days before being told to get into a truck near an unknown location. Subject stated that he was in the vehicle for approximately 10 minutes before being apprehended by the Border Patrol on 12/22/2010 at approximately 2000 HRS. Subject was apprehended along with 9 other individuals. The subject claims to have traveled from India to Ecuador alone and without meeting a smuggler. He claims to have met a Smuggler named LEO in Tapachula, Mexico. The subject paid the smuggler \$1000.00 US dollars to be smuggled to Houston, Texas. From there, the subject was to pay \$3000.00 US dollars to get some documents to work and live in the United States.

Signature  ERIC FLORES	Title BORDER PATROL AGENT
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000327

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Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
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IMMIGRATION HISTORY:

SUBJECT came back negative in IAFIS and IDENT.

CRIMINAL HISTORY:

Records checks were performed through Del Rio Sector Communications (KAK-920) and came back with negative results.

SUBJECT was extensively interviewed and claims no gang or terrorist affiliations or ties.

SUBJECT has no wants or warrants pending. EF

ADMINISTRATIVE PROCESSING:

SUBJECT freely admitted that he illegally entered the United States by crossing the Rio Grande River approximately 41 miles northwest of the Laredo Colombia Bridge Port of Entry in Laredo, Texas and was not inspected by an Immigration Official, and was not admitted legally by the Attorney General of the United States or the Commissioner of the Department of Homeland Security.

SUBJECT is inadmissible pursuant to Section 235 (b) (1) of the Immigration and Nationality Act (Act), 8 U.S.C. 1225 (b) (1), the Department of Homeland Security has determined that he is inadmissible to the United States under Section 212 (a) (7) (A) (i) (I) of the Act, as amended, and therefore is subject to removal, in that: he is an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act.

SUBJECT states that he has no petitions filed on his behalf.

Service Forms I-860 and I-296 were prepared and served on the SUBJECT.

CONSULAR NOTIFICATION:

SUBJECT was advised of, and declined, his right to speak with the Consulate of India. The India Consulate Office was contacted via fax as to the apprehension of SUBJECT.

CREDIBLE FEAR/HEALTH:

SUBJECT appears to be in good health and has no claims of any health issues.


SUBJECT claims that his life would be in danger if he is returned back to his native country of India. Subject claims he has been persecuted in India due to his religious beliefs. EF

After extensive questioning, the subject appears to be an Indian Punjabi Sikh.

PROPERTY/MONEY:

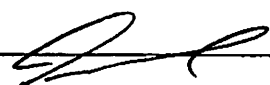
SUBJECT was in possession of \$0.00 US Dollars. SUBJECT has property tagged with tag#435523. EF

Richard Gratkowski of ICE and Ben Ponce De Leon of Carrizo Springs Intelligence

Signature  ERIC FLORES	Title BORDER PATROL AGENT
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302 301

Alien's Name SINGH, DALJIT	File Number A200 893 771 Event No: CAR1112000069	Date 12/22/2010
<p>interviewed all subjects involved in the vehicle load. BIC and JTTF were notified of the Special Interest Aliens. Jade Woodruff of the JTTF was contacted, ran record checks on all individuals and declined to respond.</p> <p>NTC Log #848115.</p> <p>DISPOSTION: SUBJECT is being processed for 8 U.S.C. 1182/Expedited Removal. Subject was not prosecuted as per Del Rio Sector Prosecution guidelines due to the fact he entered the United States through the Laredo Sector Area of Operation. Subject was advised that he may not return to the United States for a period of 5 years, and if he does he will be subject to a Reinstatement of a Prior Order of Removal. Subject will be placed on an I-203 and will be transferred to a Geo facility pending his removal by the Office of Detention and Removal Personnel. The File was sent to Del Rio Prosecutions.</p>		
Signature  ERIC FLORES	Title BORDER PATROL AGENT	

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Exhibit 55

Record of Sworn Statement in Proceedings
under Section 235(b)(1) of the Act

U.S. Department of Homeland Security

Office: CARRIZO SPRINGS, TX, BORDER PATROL
STATION

File No: A200 893 771
Event No: CAR1112000069

Statement by: DALJIT SINGH

In the case of: DALJIT SINGH

Date of Birth: 04/18/1981

Gender (circle one): Male Female

At: CARRIZO SPRINGS, TX, BORDER PATROL STATION Date: December 23, 2010

Before: ERIC FLORES

BORDER PATROL AGENT

(Name and Title)

In the PUNJABI language. Interpreter Juliet # 1575 Employed by LANGUAGE LINE SERVICES

I am an officer of the United States Department of Homeland Security. I am authorized to administer the immigration laws and to take sworn statements. I want to take your sworn statement regarding your application for admission to the United States. Before I take your statement, I also want to explain your rights, and the purpose and consequences of this interview.

You do not appear to be admissible or to have the required legal papers authorizing your admission to the United States. This may result in your being denied admission and immediately returned to your home country without a hearing. If a decision is made to refuse your admission into the United States, you may be immediately removed from this country, and if so, you may be barred from reentry for a period of 5 years or longer.

This may be your only opportunity to present information to me and the Department of Homeland Security to make a decision. It is very important that you tell me the truth. If you lie or give misinformation, you may be subject to criminal or civil penalties, or barred from receiving immigration benefits or relief now or in the future.

Except as I will explain to you, you are not entitled to a hearing or review.

U.S. law provides protection to certain persons who face persecution, harm or torture upon return to their home country. If you fear or have a concern about being removed from the United States or about being sent home, you should tell me so during this interview because you may not have another chance. You will have the opportunity to speak privately and confidentially to another officer about your fear or concern. That officer will determine if you should remain in the United States and not be removed because of that fear.

Until a decision is reached in your case, you will remain in the custody of the Department of Homeland Security.

Any statement you make may be used against you in this or any subsequent administrative proceeding.

Q. Do you understand what I've said to you?

A. Yes.

Q. Do you have any questions?

A. No.

Q. Are you willing to answer my questions at this time?

A. Yes.

Q. Do you swear or affirm that all statements you are about to make are true and complete?

A. Absolutely.

Q. What is your complete and correct name?

A. Daljit Singh.

Q. Have you ever used any other names?

A. No, never.

Q. When and where were you born?

... (CONTINUED ON I-831)

Page 1 of 3

x Daljit

I-867A (08/01/07)

(57)

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Alien's Name DALJIT SINGH	File Number A200 893 771 Event No: CAR1112000069	Date December 23, 2010
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A. I was born on April 18, 1981 in Patiala, Punjab, India.
 Q. Of what country are you a citizen?
 A. India.
 Q. Of what country are your parents citizens?
 A. India.
 Q. Do you have any documents issued by any legal authority that permits you to enter, live, or work in the United States?
 A. No.
 Q. Have your Parents ever resided in the United States?
 A. No.
 Q. Do you have any claim to being a citizen of the United States?
 A. No.
 Q. Do you have any United States immigration Petitions pending on your behalf?
 A. No.
 Q. When did you last enter the United States?
 A. Three days ago.
 Q. How did you last enter the United States?
 A. Walking.
 Q. What was your purpose for your last entry into the United States?
 A. I came to claim political asylum.
 Q. Where were you going today?
 A. New York.
 Q. Have you ever resided here in the United States before?
 A. No.

Immigration pattern

Q. When was the last time you entered the United States before this?
 A. I came for the first time.

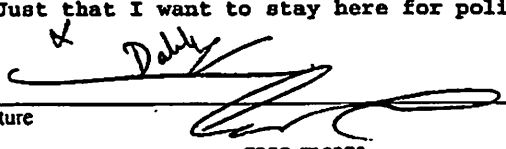
Illicit Enterprise

Q. Have you ever been arrested by the police in the United States or any other country?
 A. I stated before, I was arrested in India by the police due to my religious affiliation, but released.
 Q. Have you ever been arrested, detained, deported or excluded by United States Immigration officers?
 A. No sir.

Consular Rights


Q. Do you wish to speak with a representative of your country?
 A. No.

Q. Is there anything else you would like to say?
 A. Just that I want to stay here for political asylum.

Signature  ERIC FLORES	Title BORDER PATROL AGENT
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306 305

Alien's Name DALJIT SINGH	File Number A200 893 771 Event No: CAR1112000069	Date December 23, 2010
<i>H</i> <i>Daljit</i>		
Signature  ERIC FLORES	Title BORDER PATROL AGENT	

59

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**Jurat for Record of Sworn Statement in
Proceedings under Section 235(b)(1) of the Act**

U.S. Department of Homeland Security

Q: Why did you leave your home country or country of last residence?

A. TO SAVE MY LIFE.

✓ Daljit

Q. Do you have any fear or concern about being returned to your home country or being removed from the United States?

A. YES, BECAUSE THE OTHER RELIGIONS WANT TO KILL PEOPLE FROM MY RELIGION.

✓ Daljit

Q. Would you be harmed if you are returned to your home country or country of last residence?

A. YES.

✓ Daljit

Q. Do you have any question or is there anything else you would like to add?

A. NO.

✓ Daljit

I have read (or have had read to me) this statement, consisting of 1 pages (including this page). I state that my answers are true and correct to the best of my knowledge and that this statement is a full, true and correct record of my interrogation on the date indicated by the above named officer of the Department of Homeland Security. I have initialed each page of this statement (and the corrections noted on page(s) N/A).

✓ Daljit

Signature: DALJIT SINGH

Sworn and subscribed to before me at CARRIZO SPRINGS, TX, BORDER PATROL STATION
on December 23, 2010.

ERIC FLORES
BORDER PATROL AGENT

Signature of Immigration Officer

Witnessed by: BPA J. RUIZ

J

(60)

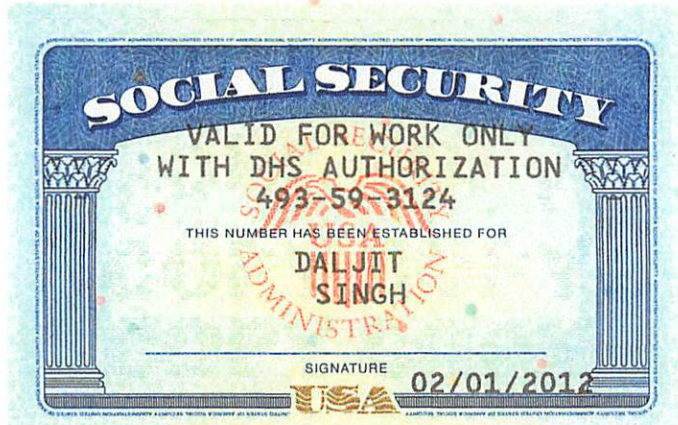
000334
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Exhibit 56

YOUR SOCIAL SECURITY CARD

ADULTS: Sign this card in ink immediately.
CHILDREN: Do not sign until age 18 or your first job,
whichever is earlier.

Keep your card in a safe place to prevent loss or theft.
DO NOT CARRY THIS CARD WITH YOU.
Do not laminate.



Improper use of this card or number by anyone is punishable by fine, imprisonment or both. If you believe someone is using your Social Security number fraudulently, notify the Federal Trade Commission at 1-877-438-4338 or online at www.consumer.gov/idtheft.

This card belongs to the Social Security Administration and you must return it if we ask for it.

If you find a card that isn't yours, please return it to:
Social Security Administration
P.O. Box 33008, Baltimore, MD 21290-3008

For any other Social Security business/information, contact your local Social Security office. If you write to the above address for any business other than returning a found card you will not receive a response.

Social Security Administration
Form SSA-3000 (08-2011)

 F98461011

310

Exhibit 57

WA USA **WASHINGTON** COMMERCIAL DRIVER LICENSE

4d LIC# SINGHD*194JQ
1 SINGH
2 DALJIT
3 DOB 04-18-1981 4a Iss 01-11-2013
9 2356 15TH AVE S APT 394 SEATTLE WA 98144-5057
15 Sex M 16 Hgt 5-04
17 Wgt 175 18 Eyes BRN
9 Class A 9a End NONE 4b Exp 04-18-2017
12 Restrictions NONE

5 DD SINGHD*194JQL8130113D1610 Rev 02-15-2009

WASHINGTON DEPARTMENT OF LICENSING



CLASS: A - Any vehicle or combination of vehicles except motorcycles
ENDORSEMENTS:
NONE

RESTRICTIONS:
NONE

Please notify the Department of Licensing within 10 days of a change of address



312
~~311~~

Exhibit 58

Affidavit of Nicole C Ahrenholz, MD

Nicole C Ahrenholz, MD, hereby, declares pursuant to 28 U.S.C. 1746, under penalty of perjury that:

1. I am a licensed physician in the state of Washington, currently working as a Clinical Assistant Professor for the Department of Medicine at University of Washington School of Medicine and as an attending physician at the Harborview International Medicine Clinic. I am fully trained and board certified in Internal Medicine.
2. I am a graduate of Oregon Health & Science University. I received my clinical training in Internal Medicine at University of Washington.
3. I care for refugees at Harborview's International Clinic and have developed expertise in caring for trauma survivors and refugees in this setting. I teach on these and other topics for resident physicians who are in training at the University of Washington. I have been trained further by HealthRight International in the evaluation and medical documentation of victims of torture and other human rights abuse.
4. On 08/13/2015, I conducted a detailed clinical interview and physical examination of Daljit Singh at the offices of the International Medical Clinic in Seattle. I confirmed identity with his Washington State drivers license. The interview and exam took approximately 60 minutes. I have read the declaration of Daljit Singh and am familiar with the details described therein.
5. The following is my understanding of the events leading to the arrival of Daljit Singh in this country and is based upon my own interview, examination and review of the application. I have limited the narrative to those aspects of the history that are pertinent to the medical report that I am providing.

CLINICAL INTERVIEW

6. Daljit Singh was born in Patiala, Punjab, India. After being beaten and threatened by members of an opposing political party, Daljit Singh felt that he was no longer safe in India and so fled to the United States and now seeks asylum.
7. Daljit Singh was beaten on two occasions. The first time he was confronted by a group of men. He was hit and punched until he fell to the ground, then was kicked repeatedly. He sustained injuries on his back, stomach, and legs. When he was kicked very hard in the stomach, he lost consciousness. He was brought to the hospital where he received medications for pain. His injuries healed without scarring. On the next occasion, he was confronted by a group of men who again beat him and threw him to the ground. He was punched, kicked, and hit with sticks. While he was on the ground, one person stomped on his right hand with a heavy boot. This resulted in severe pain and swelling. Another person grabbed his left middle finger and twisted it, resulting in a fracture. Sometime in the course of the beating he sustained an injury to the top of his left shoulder which then bled. He isn't sure how this occurred. At one point, one person was holding his left arm over his head, pinning it to the ground, when another person attempted to cut him in the neck

 MD

with a sharp object. Mr. Singh attempted to protect himself by blocking the object with his arm, resulting in a deep cut in the inside of his left upper arm. After the beating he was taken to the hospital where he was treated for his injuries. His right hand eventually healed on its own. He reports that his fractured left middle finger was placed in a cast at first and then a splint. The fracture eventually healed, but left him unable to fully extend the finger. The wound on his left shoulder healed on its own. The cut on his left arm was sutured at the hospital. This healed and the sutures were removed after a few weeks.

8. Scars related to the beating are listed below:

- a. Deformity of right hand over the 3rd and 4th knuckles from his hand being stomped on
- b. Deformity of left middle finger from being grabbed, twisted, and fractured
- c. Scar on left shoulder from an unclear mechanism during the beating
- d. Scar on inside of upper left arm from a sharp object

CLINICAL EXAM

9. Scars ascribed to beating:

- a. 2.5 x 1.8 cm firm nodule over right 3rd knuckle, 2.2 x 1.3 cm firm nodule over right 4th knuckle (see 8.a. above, Photo 1 attached)
- b. Deformity at tip of left middle finger resulting in inability to fully straighten the finger(see 8.b. above, Photo 2 attached)
- c. 2.5cm darkened, widened linear scar on top of left shoulder(see 8.c. above, Photo 3 attached)
- d. 4.5cm light-colored, widened, linear scar with surrounding pinpoint light scars at regularly-spaced intervals (see 8.d. above, Photo 4 attached)

10. Scars from other etiologies:

- a. Circular scar on left upper arm from previous immunization
- b. Light-colored, linear, narrow scar on tip of left 3rd finger from unclear etiology
- c. Dark-colored, widened, linear scar on left mid-back from being burned with a hot iron
- d. Dark-colored, thickened, irregular scar on the back of the right heel from a prior fracture and subsequent surgeries

INTERPRETATION OF PHYSICAL FINDINGS

11. Daljit Singh was beaten on 2 occasions. The scars are consistent with his history and the mechanism described. Most notably:



- a. The swelling and deformity over the knuckles of his right hand are consistent with a crushing injury in that there is no superficial skin defects, but he has significant swelling and deformity along the tendons.
- b. The deformity at the tip of the left middle finger is consistent with prior fracture in that his range of motion is limited and cannot fully straighten the finger.
- c. He is not sure of the mechanism of injury of the scar on the top of his left shoulder, and the appearance is nonspecific.
- d. The scar on the inside of his left upper arm is highly consistent with his report of being cut with a sharp object while protecting himself, as the location is unusual for other types of injury such as accidental cuts, but is consistent with his report of being in a protective posture and blocking his head and neck. The small, regularly spaced scars surrounding the large wound are highly consistent with the appearance of healed suture marks, consistent with his report of being treated at the hospital.

SUMMARY

12. In closing, it is my assessment that Daljit Singh demonstrates the physical sequelae of trauma. The scars are consistent with the beatings he describes.

13. Daljit Singh's demeanor during the evaluation was consistent with the reported experiences in that he talked sincerely about his past and present situation. Furthermore, he did not attempt to ascribe all of the scars to the beatings, but was clear about which scars were from other etiologies and which scars were from the beatings.

I, Nicole C Ahrenholz, MD, declare under penalty of perjury that the foregoing is true and correct.

