

Affidavit of Ibrahim Parlak

I, Ibrahim Parlak, hereby swear or affirm that the following is true to the best of my knowledge and recollection under penalties of perjury:

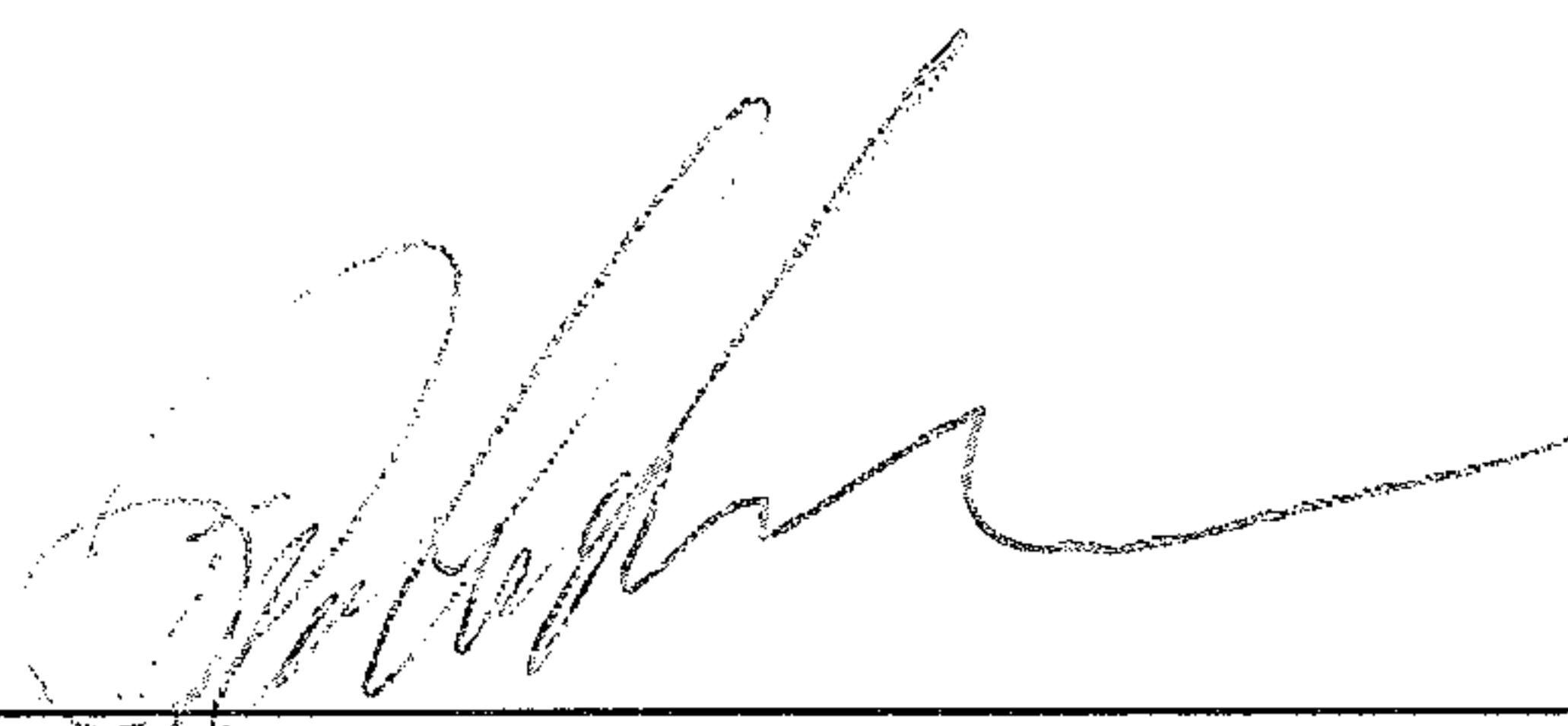
1. My name is Ibrahim Parlak. I write to explain my answers on Form I-589 submitted with my Motion to Reopen filed with the Board of Immigration Appeals in December of 2015 for CAT relief to be re-examined in light of changed country conditions in Turkey.
2. My answers are all true and correct to the best of my knowledge on the submitted Form I-589. However, because the government charged me with fraud when my lawyers failed to check the box that I had been arrested on my permanent residency and naturalization application in 1994 and 1998, respectively, I now feel the need to clarify why I answered certain questions as I did.
3. The boxes I'm concerned with explaining are, Part C, 3., Part B, 1.A., and Part B, 3.A.
4. I answered 'no' to Part C, 3., because it is the truth. I have never harmed anyone, for any reason. I was present with a group returning to Turkey, and well into Turkish territory, as detailed in my testimony in front of the immigration judge. Another group far behind ours, and still in Syria, was involved in a firefight with Turkish soldiers. Members of that group returned fire, and two Turkish soldiers died. I was far away from that skirmish, had no role in their deaths, nor was I convicted for their deaths. But the Turkish government has said I was complicit in their deaths, even

though those declarations came from a now disbanded court that used torture-induced evidence.

5. In Part B, 1.A., I wish to clarify that the protest itself was not violent, but rather, I was protesting a violent massacre that occurred in Maras. Further, I answered that I was harmed and mistreated in the past, and explained three separate occasions on which I was detained and violently beaten and/or tortured by the Turkish authorities. This is the truth. I did not mention in the narrative on Form I-589 that the 1988 arrest was related to the border skirmish when two Turkish soldiers were shot and killed, though I was not involved with that event. I was not involved with their deaths, and not held accountable by the Turkish government for their deaths. But, because the DHS alleged that because I omitted their deaths from my narrative and testimony when I initially received asylum in 1991, I wish to make it clear – even though the government clearly knows the facts, as it did in 1991 – that my 1988 arrest stemmed from that event, even though I was eventually only charged with separatism. I have consistently given true documents about that event, including the original Turkish news articles given with my asylum application.
6. I listed the organizations with which I have been affiliated in Part B, 3.A. This is a true and accurate list. I was never an active member of the PKK, as the government alleges, so I cannot list it, as that would be false. The allegation I was a member of the PKK comes from the Turkish Security Court paperwork it sent to the United

States. That court has been disbanded because it routinely relied on torture-induced evidence, which is hardly in step with American ideals.

FURTHER AFFIANT SAYETH NAUGHT:



Ibrahim Parlak, Affiant

Signed this 22 day of January, 2016.

Deborah E. Freehling
NOTARY PUBLIC

