

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
BOARD OF IMMIGRATION APPEALS

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In the Matter of: )  
 )  
IBRAHIM PARLAK, ) File No: A71 803 930 - Detroit  
 )  
In Removal Proceedings )  
\_\_\_\_\_)

Index for Supplemental Submission of Exhibits and Legal Authority to  
Motion to Reopen

Exhibit

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- Exhibit 7A: Phillips, David L., Director of the Program on Peace-building And Rights, Columbia University in New York, Institute for The Study of Human Rights, "Research Paper-ISIS-Turkey Links", [www.huffingtonpost.com/david-l-phillips/research-paper-isis-turkey](http://www.huffingtonpost.com/david-l-phillips/research-paper-isis-turkey) 11/9/14. p. 21 - 24
- Exhibit 8: Expert opinion letter from Dr. William Jones, Amnesty International, with Curriculum Vitae. p. 25 - 29
- Exhibit 9: Translations of two (2) Turkish articles referenced in the Motion to Reopen (previously submitted to the Court

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- Exhibit 10: Turkish article published 12/23/15, "End of the road for Karayilan's Friend in the US.A.", [www.sabah.com.tr](http://www.sabah.com.tr), with translation, calling Ibrahim Parlak a "fugitive from Turkish justice", and confirming that the author had received information from Turkish authorities that "Turkey agreed to issue a "travel document", which was not issued before, that will open the door for the United States Department of Homeland Security to deport and send Ibrahim Parlak, who martyred two Turkish soldiers in 1988 back to Turkey." The author also claims that "The authorities talking to the SABAH News Agency (Turkey) said Turkey agreed this time to provide this document and there is no obstacle preventing him from serving his 5 year prison sentence in Turkey."
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- Exhibit 11: Turkish article published 12/24/15, "Deportation of the PKK member is 90-day delayed", [www.bugun.com.tr](http://www.bugun.com.tr), with translation, announcing that Mr. Parlak's "deportation decision" was being delayed for 90 days, and citing a history of the case.
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- Exhibit 20: "Turkish 'cleansing' operation rocks southeastern cities", <http://america.aljazeera.com> , 12/25/15. p. 82 - 84
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- Exhibit 23: Bilginsoy, Zeynep and Isil Sariyuce, Deadly shootout caught on video, [www.cnn.com/2015/11/28/asia/turkey-kurdish-lawyer-killed/](http://www.cnn.com/2015/11/28/asia/turkey-kurdish-lawyer-killed/) 11/28/15, detailing the death of the Pro-Kurdish lawyer Tahir Elci, who was killed while making a press statement. p. 105 - 107
- Exhibit 24: Resneck, Jacob, "Violence spirals in Turkey's Kurdish southeast", [www.dw.com/en/violence-spirals](http://www.dw.com/en/violence-spirals) , 10/18/15. P. 108 - 114
- Exhibit 25: Urgent Appeal of Faysal Sariyildiz on the Curfews Implemented by the Turkish Government", <https://hdpenglish.wordpress.com> , 12/27/15. p. 115 - 117
- Exhibit 26: Chulov, Martin, "Turkey sends in jets as Syria's agony spills over every border", [www.theguardian.com/world/2015/jul/26/isis-syria-turkey-us](http://www.theguardian.com/world/2015/jul/26/isis-syria-turkey-us) , 7/25/15. p. 118 - 120
- Exhibit 27: Khodr, Zeina, "Russia hits back at Turkey by changing Syria 'game'", [www.aljazeera.com/blogs/europe/2015/11/russia-hits-turkey](http://www.aljazeera.com/blogs/europe/2015/11/russia-hits-turkey) 11/29/15. p. 121 - 125
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- extradited to Turkey, <http://www.ekathimerini.com/150728/article/ekathimerini/news/4/26/13>. p. 133 - 134
- E. Romanian Supreme Court rejects extradition of Turkish Journalist, [www.agerpress.ro/corporate/about-us/Terms-of-use](http://www.agerpress.ro/corporate/about-us/Terms-of-use), 10/13/15. p. 135 - 136
- F. EU countries reject extradition requests for PKK suspects, [www.dailysabah.com/kurdish-issue/2015/09/03/9/3/15](http://www.dailysabah.com/kurdish-issue/2015/09/03/9/3/15). p. 137 - 139
- G. Supreme Court of Sweden rejects Turkey's request to extradite Kurdish politician, <http://kurdishdailynews.org/2015/05/12/>, 5/12/15 p. 140 - 145
- H. Turkish extradition request against Briton dismissed as 'abuse of process', [www.theguardian.com/law/2014/4/7/14](http://www.theguardian.com/law/2014/4/7/14). p. 146 - 147
- Exhibit 29: Printout of lead screen of Change.org Petition in support of Ibrahim Parlak, showing 32,344 signatures to date, including a sampling of comments from the signatories. p. 148 - 161
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- Exhibit 31: Medical chronology of Ibrahim Parlak and Southwestern Medical Clinic from 1996-2007, with Progress Notes p. 174 - 179
- Exhibit 32: Psychiatric report of Larry B. Feldman, M.D., with Curriculum Vitae. Dr. Feldman's report explains that Mr. Parlak began seeing him in 2005 and visited again in 2014 and 2016. Dr. Feldman opines that Mr. Parlak suffers from Post-Traumatic Stress Disorder, severe and chronic. One such symptom is objective in nature (severe sleep disturbance with frightening nightmares), and is verified by his partner, Heather Kraus, over the course of the past 2 years. p. 180 - 185
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Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Robert Carpenter", written over a horizontal line.

Robert Carpenter

One of Respondent's Attorneys

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