

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

_____)	
In the Matter of:)	
)	File No.:
CLIENT, Respondent)	
)	
In removal proceedings)	
_____)	

EXHIBIT LIST

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----	Legal Memorandum in Support of CLIENT's Application for Asylum, or, Alternatively, Withholding of Removal or Relief Pursuant to the Convention Against Torture		102-147
D.	Amended I-589 , Application for Asylum and for Withholding of Removal		156-168
E.	Declaration of CLIENT	Detailing the violence that Ms. CLIENT and her female relatives faced by male relatives, her belief in an Islam that affords women equal rights, and her efforts to stand up for the women around her. Ms. CLIENT further expresses her fear of being killed by family members in Pakistan because she damaged the family's honor by leaving and filing for divorce from her abusive husband, X.	169-186
Fact and Expert Witness Statements			

F.	Expert Affidavit of Charles Lindholm, Ph.D. , Professor of Anthropology at Boston University, with CV included	describing the concept of honor among the Pukhtuns, explaining conflicts between Pukhtun culture and Islam, and corroborating Ms. CLIENT's fear that her life is in danger in Pakistan.	187-204
G.	Psychological Evaluation , RC, Psy.D., MFT and JG, Psy.D., with CV included	explaining Ms. CLIENT's history of experiencing and witnessing violence and concluding that she currently meets the diagnostic criteria for both Post-Traumatic Stress Disorder and Major Depressive Disorder.	205-239
H.	Letter from X , Ms. CLIENT's brother in Pakistan	warning Ms. CLIENT that her father and brother X are currently planning to kill her and take her son away and urging her not to return.	240-242
I.	Affidavit of X , Ms. CLIENT's family friend in Pakistan	expressing concern that Ms. CLIENT's brother X threatened to kill Ms. CLIENT if he saw her and stating that it was not safe for her in Pakistan.	243-246
J.	Letter from X , Ms. CLIENT's childhood friend	confirming that it is not safe for Ms. CLIENT to return to Pakistan and explaining that Ms. CLIENT's brother came to X and cursed her for helping Ms. CLIENT to study.	247-250
Supporting Documentation			
K.	Complaint for Divorce , Circuit Court of XXX County, Virginia, XXXX	confirming that Ms. CLIENT filed for divorce from X on XXX	251-253
L.	Foreclosure Documents <ul style="list-style-type: none"> • Letter to Commissioner of Accounts, XXX • Foreclosure Accounting Statement, XXX • Trustees Deed, XX County, XXX, XXX 	confirming that Ms. CLIENT's house was foreclosed on in 2010.	254-260
M.	Apartment Rental Contract , dated XXX	confirming that Ms. CLIENT moved into an apartment with her son X in May 2009.	261-267

N.	Public Classified Advertisement, Daily News XXX, XXX XXXX	stating that X publicly disowned his daughter, CLIENT.	268-274
O.	Medical Records, XXX Emergency Department, XXX	noting that Ms. CLIENT suffers from anxiety and was prescribed medication to treat her anxiety.	275-286
P.	Separation and Property Settlement Agreement, XXXX	confirming that Ms. CLIENT and X obtained a legal separation in XXX.	287-295
Q.	Birth Certificate of X, XXX, XXX	confirming that Ms. CLIENT gave birth to her son X in XXX on XXX.	296
R.	Marriage Certificate, XXX, XXX	confirming that Ms. CLIENT and X married on XXX in XXX.	297
S.	Decree of Divorce, XXX Family Court, XXX	confirming that Ms. CLIENT and X and that Ms. CLIENT's father, X, appeared for her in court.	298-302
T.	Certificate of Muslim Marriage Agreement, XXX, XXX	confirming that Ms. CLIENT and X married on XXX.	303-306
U.	Photos of CLIENT with her son X	corroborating the relationship between Ms. CLIENT and X.	307-308
V.	Educational Certificates and Diplomas <ul style="list-style-type: none"> • Diploma, University of XXX, May XXX • Certificates from computer trainings, XXX ("XXX"), X-X • Diploma, University of XXX, February XXX • Certificate of Intermediate Exam Completion, XXX XXX • Certificate of Secondary School Exam Completion, XXX, January XXX 	confirming that Ms. CLIENT obtained a Masters of Arts in Sociology, received computer trainings, obtained a bachelor's degree, and completed intermediate and secondary school.	309-318

W.	United States Department of State, <i>2009 Human Rights Report: Pakistan</i> (March 11, 2010). (complete report)	demonstrating that women and girls in Pakistan are subjected to extreme acts of violence and that failure of the government to protect them, including honor killings. The report also notes the enforcement powers of <i>jirgas</i> in tribal communities as well as the difference in law in the Federally Administered Tribal Areas (FATA), where Pakistani law does not apply.	319-344
X.	United States Department of State, <i>2008 Human Rights Report: Pakistan</i> (February 25, 2009). (excerpts)	stating that honor killings generally occurred within families, that perpetrators negotiated nominal payments to avoid serious punishment, and that government officials defended honor killings as a part of Pakistan's tradition.	345-348
Y.	United States Department of State, <i>2007 Human Rights Report: Pakistan</i> (March 11, 2008) (excerpts)	noting that 434 of the 613 recorded honor crimes by mid-year were against women, that honor killings were common among tribes in the North West Frontier Province (NWFP), that religious militants attacked and harassed women in the NWFP, and that there is a stigma against divorce.	349-353
Scholarly and Media Publications			
Z.	Muazzam Nasrullah et al., <i>The Epidemiological Patterns of Honour Killing in Pakistan</i> , 19 EUROPEAN JOURNAL OF PUBLIC HEALTH 193 (2009).	documenting the high prevalence of honor killings in Pakistan, noting that 55% of honor killings are committed with firearms, particularly in the NWFP, and describing the legal system's failure to protect women from honor killings because the law allows the victim's family to forgive the killer in exchange for compensation.	354-358
AA.	Kristin Elisabeth Solberg, <i>Killed In The Name of Honour</i> , 373 THE LANCET 1933 (2009).	describing how Pakistan has among the highest instances of honor killings in the world and that the numbers are likely higher than reported. The article further states that honor killings are most often committed by the husband, brothers and other close relatives of the victim.	359-60

BB.	Are Knudsen, Chr. Michelsen Institute, <i>License to kill: Honour killings in Pakistan</i> (2004), at http://www.cmi.no/publications/publication/?1737=license-to-kill-honour-killings-in-pakistan .	emphasizing the customs surrounding honor killing and its foundation in tribal justice, particularly in the North West Frontier Province.	361-387
CC.	Salman Masood, <i>Pakistan Beings Inquiry Into Deaths of 5 Women</i> , N.Y. TIMES (Sept. 3, 2008).	exploring the murder of five Pakistani women buried alive in an honor killing because the women planned to marry men of their choice.	388-389
DD.	Charles Lindholm, <i>Polygyny in Islamic Law and Pukhtun Practice</i> , 47 ETHNOLOGY 181 (2008).	describing the intersection of the Pukhtun code, <i>Pukhtunwali</i> , and Islam. Professor Lindholm notes that while the Pukhtun believe that their religious faith and traditions are seamlessly united, many of local Pukhtun practices “fly in the face of Islam, particularly with regard to women's rights.”	390-402
EE.	Isabel Hilton, <i>The Pashtun Code</i> , The New Yorker (2001).	discussing the role of women in Pashtun society and how domestic violence is regarded as a form of entertainment in village life. If a husband's wife is dishonored, the man loses his standing in the community.	403-412
Non-Governmental and Human Rights Organization Reports			
FF.	Aurat Foundation, <i>Violence Against Women in Pakistan: A qualitative review of statistics for 2009</i> (June 2010). (Excerpts), at http://www.af.org.pk/PDF/VAW%20Reports%20AND%20PR/VAW%20Report%202009.pdf .	Reporting that in 2009, there was a 13% increase in reported cases of violence against women, including a 27.15% increase in honor killings, for a total of 604. Sections One (description of violence against women), Two (overview of cases of violence against women in Pakistan overall), and Five (cases in Khyber Pakhtunkhwa) are included.	413-466
GG.	Amnesty International, <i>Amnesty International Report, The State of the World's Human Rights</i> (Annual reports for years 2008-2010)	describing an increase in Taliban control and related violence against women in the FATA and NWFP, noting that there were 960 reported honor killings in 2010, and explaining that despite a ban on <i>jirgas</i> ,	467-483

	(Excerpts on Pakistan), at http://thereport.amnesty.org/en/download .	official support for them continued.	
HH.	Amnesty International, <i>Culture of Discrimination: A Fact Sheet on "Honor" Killings</i> (Jul. 2005), at minheder.nu/honorkillings.pdf .	describing that honor killings are committed in an effort to reclaim 'honor' for the shameful act committed by a female family member.	484-485
II.	Amnesty International: <i>Pakistan, Honour Killings of Girls and Women</i> (1999), at http://www.amnesty.org/en/library/asset/ASA33/018/1999/en/952457dd-e0f1-11dd-be39-2d4003be4450/asa330181999en.html .	illustrating the high prevalence of honor killings in Pakistan, which are most often committed by one's close relatives, and observing that seeking divorce is one reason victims are killed.	486-501
JJ.	Human Rights Watch: <i>Universal Periodic Review of Pakistan, Human Rights Watch's Submission to the Human Rights Council</i> (2008), at ib.ohchr.org/.../HRW_PAK_UPR_S2_2008_HumanRightsWatch_urpsubmission.pdf .	corroborating the high levels of violence against women in Pakistan and illustrating the lack of governmental support for victims of violence. The report further describes how police do not register or investigate crimes of gender-based violence.	502-506
KK.	Human Rights Watch, <i>Item 12 - Integration of the human rights of women and the gender perspective: Violence Against Women and "Honor Crimes,"</i> (Apr. 5, 2001).	defining the term "honor killing" and highlighting that women often have to choose between remaining in an abusive marriage or facing death for leaving the marriage.	507-508
LL.	UN Office for the Coordination of Humanitarian Affairs, IRIN: <i>Pakistan: Focus on Honour Killings</i> (2003), at http://www.irinnews.org/report.aspx?reportid=19247 .	establishing that in the NWFP, victims of honor killing are hacked, stabbed, burned, and shot, and noting that in tribal Pashtun communities, victims are killed for engaging in what is perceived as culturally unacceptable behavior.	509-510
MM.	Asian Human Rights Commission, <i>Gender Based Disparities Worst in Pakistan</i> (2010), at http://www.humanrights.asia/news/	arguing that Pakistan is one of the world's worst countries in terms of the global gender gap because of structural inequalities and violence against women.	511-513

	ahrc-news/AHRC-STM-041-2010.		
NN.	Asian Human Rights Commission, <i>Acid Attacks A Serious Concern In Pakistan</i> (2010), at http://www.humanrights.asia/resources/journals-magazines/eia/eiav4a1/3-acid-attacks-a-serious-concern-in-pakistan .	explaining the common practice of acid attacks, in which women are burned with acid due to familial disputes, rape, rejecting a man for marriage, or as punishment for not following a man's commands.	514-517
OO.	Asian Human Rights Commission, <i>Pakistan: Constant Violence Against Women in 2009</i> (Feb. 2010), at http://www.humanrights.asia/news/ahrc-news/AHRC-ART-014-2010 .	describing how <i>jirgas</i> justify honor killings and use them as a form of justice and noting that in the patriarchal Pukhtun culture, young girls are given as wives in arranged marriages, called <i>swara</i> , in order to settle tribal disputes.	518-521
PP.	Asian Human Rights Commission, <i>Pakistan: To Stop Honour Killings There Must Be A Bigger Crackdown on Illegal Jirgas - Getting Away With Murder in Pakistan</i> (2008), at http://www.ahrchk.net/statements/mainfile.php/2008statements/1741/ .	corroborating violence against women in the tribal North and describing how <i>jirga</i> -ordered killings have led to high rates of murder.	522-524
Additional Sources			
QQ.	Immigration and Refugee Board of Canada, <i>Pakistan: Circumstances under which single women could live alone</i> , PAK102656 E (Dec. 2007), at http://www.unhcr.org/refworld/docid/4784deec.html .	describing the difficulties for women in Pakistan who attempt to live alone, and that those in the toughest situation are women who do not have the support of their families.	525-528
RR.	Peter Blood, ed. Library of Congress Country Studies, <i>Pakistan: A Country Study</i> (1994). (Excerpts on Pakhtuns and Gender Relations), at http://countrystudies.us/pakistan/ .	describing the connection between a man's honor and the actions of his female relatives as well as the extreme practice of female seclusion, <i>purdah</i> , in which women almost never leave their homes except when they marry.	528-532
SS.	G.A. Parwez, <i>Woman in the Light of Quran</i> , Idara Tolu-e-Islam, at	arguing that men and women are equal under Islam and that Islam does not permit a man to beat his wife for disobedience.	533-583

	http://www.tolueislam.com/Parwez/BA_Parwez.htm .		
TT.	<i>Administrative System of Federally Administered Tribal Areas (FATA)</i> from <i>at</i> www.fata.gov.pk , the Government of Pakistan's website for the FATA.	explaining the administration of law in the FATA, where Pakistani law does not apply, and noting that there is little governmental interference with tribal matters.	584-586
----	Proof of Service		587