

# Michigan High School Mock Trial Tournament



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2019-2020 Case High School  
Case Materials

## **IN THE MATTER OF QUIN ZION**

The relevant materials for this season are in two documents. First, please see the general rules document online or [here](https://miciviced.org/programs/mock-trial) [or on [miciviced.org/programs/mock-trial](https://miciviced.org/programs/mock-trial)].

Second, this document contains the case materials. Please review the introduction materials for any updates and/or adaptations to the general rules document.

Welcome to the 2019-2020 Mock Trial Season.  
We are glad you are joining us. .



*Educating for Vibrant Civic Communities*

Dear Mock Trial Community Member,

Welcome! Congratulations on making the decision to join Michigan Mock Trial. We warmly welcome all the students, teachers, attorneys, educators, judges, law students, legal assistants and others who will participate in the Michigan High School Mock Trial Tournament. Thank you for choosing to expand your knowledge of civic education through the mock trial process.

We hope that you will find your involvement to be intellectually stimulating and personally rewarding. The Tournament's additional goals include:

- Further understanding of the law, court procedures and the legal system.
- Increase proficiency in basic life skills such as listening, speaking, reading and reasoning.
- Promote communication and cooperation between the school community—teachers and students—and the legal and business communities.

There are two important documents for your use. First, please see the general rules document online or [here](#) [or on [miciviced.org/programs/mock-trial](http://miciviced.org/programs/mock-trial)]. These rules are fairly universal from year to year and provide general tips and outline general tournament procedures.

Second, *this* document contains the case materials. Please review the introduction materials for any updates/adaptions to the general rules document. These are split up so there is year-round access to the rules and more timely updates to the case materials.

### **Embracing Real World and Controversial Issues**

MCCE has a long tradition of exploring difficult and controversial issues through Mock Trial competition. This year is no exception as the topic of immigration and immigration enforcement can result in strong emotional responses. Please be mindful of at least these pertinent issues

- Many Michigan students may be experiencing the immigration system first-hand. Please ensure that trauma is never reinforced because of the case materials.
- Please be mindful to acknowledge and separate the 'role' from the person. Know that role playing may require additional supports and never should role playing interfere with one's beliefs or thoughts.

- We expect that all participants will behave respectfully and in conformance with the code of conduct. If there are deviations, please seek out proper supports and notify MCCE of any issues that may arise during the season.
- Furthermore, we are pleased that this case has been vetted by previous states and found the case very compelling as informative as to critical issues in society.

### **NEW! Rules and Processes Updates**

**PLEASE READ.** The case materials for 2019-2020 differ from our convention in that the parties are not a plaintiff/prosecution or defendant. For this year, they are the “Respondent” and “ICE” or the “government”. Team rosters, score sheets, etc. should reflect this.

### **A Note on Case Formatting**

After downloading the PDF, a [Google Document](#) (“Google Doc”) will be made available for your use. This is in effort to:

- 1) allow you to have greater internal document navigation - you can use the internal hyperlinks to get to sections of the document more quickly,
- 2) make sure all participants have access to the document (in case the other format is not available), and
- 3) to allow you to customize the document for your use. Since so many people take the time to repurpose, we thought we’d like to help you save some time.

You will not be able to edit the document directly, however, you can make your own copy to edit. To do this, go to the Google Doc, hit “File” then you have a few options. You can hit “Make a Copy”. Now you will be able to edit the document. You have additional features including “download as...(and into a format that works for you) and many more.

Please remember it is original format (and only the original format) that will be used for the trials. We hope this update provides you additional features for a successful season.

### **Case Updates or Issuance of Errata**

Should any errata or case corrections need to be made, please know those will be posted by the registration deadline of January 10, 2020. If you have questions or just aren’t sure about something, please reach out to us. Sometimes issues are written into the case facts and other times it might be an oversight we want to fix. Let us know what you are thinking and we will respond with guidance of how to proceed or any action we will take to resolve.

## Save the Date

Help us elevate and celebrate the Michigan legal community. Join us in hosting the 2021 National Championship for the first time in Michigan's history. Save the date, share the news, and let's host an amazing championship for the country and beyond!



## Welcome to Courtroom Artists, Journalists, and Middle School Debate

Mock Trial is growing. MCCE has included Courtroom Artists, Courtroom Journalists, and now a separate Middle School Mock Trial showcase. As you review the case materials, please think how you might use the document from the perspective of an illustrator or a reporter. Bring in your friends and colleagues to showcase their rising talents as well!

## Best Wishes

We hope you find these materials interesting and educational, and we wish you the best of luck at this year's tournaments. As always, please reach out to us if we can assist in any way. Thank you for embarking on this journey.

The Michigan Center for Civic Education  
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# Michigan High School Mock Trial Tournament 2019-2020 Materials

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## EXECUTIVE CASE SUMMARY AND ACKNOWLEDGMENTS

### Executive Case Summary\*:

Quin Zion is a Freedonian citizen that entered the United States on a student visa. After the previous political party was removed from power in Freedonia, the newly-elected government cancelled funding for Quin's education and requested Quin return home. Quin fears persecution if required to do so, in part because of previous activities investigating and reporting on allegedly "subversive" elements in Freedonia prior to arriving in the United States and prior to the recent governmental change in power. As Quin is no longer attending university as required by the student visa status, Quin has been summoned for removal proceedings; Quin has formally requested asylum in the United States fearing retribution from the new political regime.

*\*This summary is not a document for team use.  
It provides an overview of the subject matter at hand.*

### **Acknowledgements:**

**Case Credits:** Michigan's 2019-2020 Mock Trial was initially used by the Nebraska Bar Foundation and also used in Iowa's Mock Trial Competition. Thank you for your permission to adapt and bring the case to Michigan's students. Thank you to the staff and volunteers at the Michigan Center for Civic Education for adapting and updating the case to meet the needs of the Michigan community.

**Funding:** The Michigan Center for Civic Education ("MCCE") would like to thank the State Bar of Michigan, the Oakland County Bar Foundation, James Madison College, and the Litigation Section of the State Bar of Michigan for their funding support, without which the High School Mock Trial Tournament would not be possible.

If you are interested in funding and providing more opportunities for students in Mock Trial, please contact us. Let's work together to ensure all students have meaningful civic education experiences.

# PROCEDURES

**TITLE PAGE**

**MICHIGAN HIGH SCHOOL  
MOCK TRIAL TOURNAMENT  
2019-2020**

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**IN THE MATTER OF**

**QUIN ZION**  
**A23 571 113**

**IN REMOVAL PROCEEDINGS**

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Original Case Materials Developed by:

The Nebraska State Bar Foundation  
and its State Center for Law-Related Education  
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the Iowa State Bar Association Center for Law & Civic Education

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
SUPERIOR, MICHIGAN**

**IN THE MATTER OF** )  
 )  
**QUIN ZION** ) **Honorable Doris Huffman**  
**A23 571 113** ) **Presiding Judge**  
 )  
**In removal proceedings** )

**NOTICE TO APPEAR**

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

The Service alleges that:

- 1) You are not a citizen or national of the United States;
- 2) You are a native and a citizen of Freedonia;
- 3) You were admitted to the United States at NEW YORK CITY, NEW YORK, on or about JULY 29, 2018, as a nonimmigrant student to attend the Superior International University in SUPERIOR, MICHIGAN; and
- 4) You did not carry a full course of study from January 2020 to THE PRESENT.

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 237 (a)(1)(C)(1) of the Immigration and Nationality Act (ACT), as amended in that after admission as a nonimmigrant under Section 101 (a)(15) of the Act, you failed to maintain or comply with the conditions of the nonimmigrant status under which you were admitted.

**YOU ARE ORDERED** to appear before an immigration judge of the United States Department of Justice at:

**210 WALNUT STREET, ROOM 215, SUPERIOR, MICHIGAN on  
A DATE TO BE DETERMINED at A TIME TO BE DETERMINED**

to show why you should not be removed from the United States based on the charge(s) set forth.

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
SUPERIOR, MICHIGAN**

<p><b>IN THE MATTER OF</b></p> <p><b>QUINN ZION</b></p> <p style="padding-left: 40px;"><b>A23 571 113</b></p> <p><b>In removal proceedings</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>Honorable Doris Huffman</b></p> <p><b>Presiding Judge</b></p>
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**WITNESSES, EXHIBITS, AND STIPULATIONS**

**Witnesses for the Respondent**

Quin Zion – Respondent seeking Asylum  
Parker Wren – Freedonian citizen granted asylum in USA  
Rankin Bass – NGO humanitarian worker

**Witnesses for Immigration and Customs Enforcement (ICE)**

Shean Gallagher – Freedonian Citizen  
Quincy Wagstaff, PhD – Expert on Freedonia  
Jules Leonard – USCIS agent

**Exhibits**

1. Form I-589: Application for Asylum and for Withholding of Removal for Quin Zion
2. Letter from Family to Respondent (2 January 2019) – Original & Translated
3. Letter from Family to Respondent (15 Sept. 2019) – Original & Translated
4. Letter from Freedonian government to Respondent (27 December 2019)
5. Form I-589: Application for Asylum and for Withholding of Removal for Parker Wren
6. State Department Country Report – Freedonia (Feb. 2019)
7. Email to Rankin Bass from Robert Waterman, WOW
8. Abstract of Knave Foundation *Task Force Report for Freedonia*

**Stipulations**

Both sides stipulate to the following facts:

1. All exhibits included in the case are authentic and accurate in all respects. No objection to the authenticity of the exhibits will be entertained although other objections may be entertained.

2. Signatures on witness statements are omitted due to electronic delivery of the case file.
3. The requirements for venue have been met.
4. Whenever a rule of evidence requires that reasonable notice be given, it has been given.
5. Each party is required to accept these facts as true for the purposes of this trial. Stipulated facts may be argued to the fact finder.
6. Hearsay is routinely allowed in Immigration Court proceedings; however, mock trial participants are bound by mock trial rules of evidence, including the hearsay rules.

### **Burden of Proof/Order of Proof**

The original burden of proof is on the Respondent in an immigration case such as this one. Therefore, Respondent will present her/his/their side of the mock trial case first; then the government will present its side.

The following is a summary of how the burden of proof is applied in an actual immigration case:

*In re D-I-M. 24 I. & N. Dec. 448 (BIA 2008)*

An alien applying for relief or protection from removal has the burden of proving that he or she satisfies the applicable eligibility requirements and merits a favorable exercise of discretion. In the context of asylum, an applicant has the burden of demonstrating that he or she is a refugee, within the meaning of the Immigration and Nationality Act. See Section 101(a)(42)(A) of the Act, 8 U.S.C. § 1101(a)(42)(A) (2000). An applicant can establish refugee status by showing that he or she either suffered past persecution or has a well-founded fear of future persecution.

The basis on which refugee status is established dictates the regulatory framework applicable in determining overall asylum eligibility. Where the Immigration Judge finds that the applicant is a refugee based on past persecution, the applicant is presumed to have a well-founded fear of future persecution on the basis of the original claim. In that case, the burden shifts to the Department of Homeland Security (DHS) to establish by a preponderance of the evidence either that there has been "a fundamental change in circumstances such that the applicant no longer has a well-founded fear of persecution in [his or her] country of nationality," or that the applicant could avoid future persecution "by relocating to another part of [his or her] country of nationality . . . , and under all the circumstances, it would be reasonable to expect the applicant to do so."

If the DHS rebuts the presumption, the asylum application will be denied unless the applicant demonstrates "compelling reasons for being unwilling or unable to return" to his or her country of nationality, or "a reasonable possibility that he or she may suffer other serious harm upon removal to that country."

An applicant may also establish refugee status by showing that he/she/they has a well-founded fear of future persecution in the absence of, or unrelated to, any past persecution. For example, the applicant could demonstrate a well-founded fear of persecution on a basis other than that which gave rise to the past persecution. In such cases, with one exception, it is the applicant who bears the burden of establishing by a preponderance of the evidence that it would not be reasonable for him or her to internally relocate.

The exception arises in cases in which the persecutor is a government or is government sponsored, or the applicant has established persecution in the past. In these cases it is presumed that internal relocation would not be reasonable, unless the DHS establishes by a preponderance of the evidence that, under all of the circumstances, it would be reasonable for the applicant to relocate. Factors that may be relevant in determining the reasonableness of relocation include whether the applicant would face other serious harm in the place of suggested relocation; any ongoing civil strife within the country; administrative, economic, or judicial infrastructure; geographical limitations; and social and cultural constraints, such as age, gender, health, and social and familial ties.

When evaluating an application for asylum, the Immigration Judge must make a specific finding that the applicant has or has not suffered past persecution based on a statutorily enumerated ground and then apply the regulatory framework.

If the applicant has established past persecution, there is a presumption of a well-founded fear of persecution in the future and the burden shifts to the Department of Homeland Security to prove by a preponderance of the evidence that there are changed country conditions, or that the applicant could avoid future persecution by relocating, and that it would be reasonable to do so under all of the circumstances.

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
SUPERIOR, MICHIGAN**

<p><b>IN THE MATTER OF</b></p> <p><b>QUIN ZION</b></p> <p style="padding-left: 40px;"><b>A23 571 113</b></p> <p><b>In removal proceedings</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>Honorable Doris Huffman</b></p> <p><b>Presiding Judge</b></p>
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**LEGAL AUTHORITIES**

**8 USC § 1158**  
**Title 8 ALIENS AND NATIONALITY**  
**Chapter 12 IMMIGRATION AND NATIONALITY**

**8 USC § 1101. Definitions**

SUBCHAPTER I - GENERAL PROVISIONS

(a) As used in this chapter –

(42) The term "refugee" means (A) any person who is outside any country of such person's nationality or, in the case of a person having no nationality, is outside any country in which such person last habitually resided, and who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of, that country because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion, or (B) in such special circumstances as the President after appropriate consultation (as defined in section 1157(e) of this title) may specify, any person who is within the country of such person's nationality or, in the case of a person having no nationality, within the country in which such person is habitually residing, and who is persecuted or who has a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. The term "refugee" does not include any person who ordered, incited, assisted, or otherwise participated in the persecution of any person on account of race, religion, nationality, membership in a particular social group, or political opinion. For purposes of determinations under this chapter, a person who has been forced to abort a pregnancy or to undergo involuntary sterilization, or who has been persecuted for failure or refusal to undergo such a procedure or for other resistance to a coercive population control program, shall be deemed to have been persecuted on account of political opinion, and a person who has a well founded fear that he or she will be forced to undergo such a procedure or subject to persecution for such failure, refusal, or resistance shall be deemed to have a well founded fear of persecution on account of political opinion.

## **8 USC § 1158. Asylum**

### **SUBCHAPTER II - IMMIGRATION**

#### Part I - Selection System

##### (a) Authority to apply for asylum

###### (1) In general

Any alien who is physically present in the United States or who arrives in the United States, irrespective of such alien's status, may apply for asylum in accordance with this section.

###### (2) Exceptions

###### (A) Safe third country

Paragraph (1) shall not apply to an alien if the Attorney General determines that the alien may be removed, pursuant to a bilateral or multilateral agreement, to a country (other than the country of the alien's nationality or, in the case of an alien having no nationality, the country of the alien's last habitual residence) in which the alien's life or freedom would not be threatened on account of race, religion, nationality, membership in a particular social group, or political opinion, and where the alien would have access to a full and fair procedure for determining a claim to asylum or equivalent temporary protection, unless the Attorney General finds that it is in the public interest for the alien to receive asylum in the United States.

###### (B) Time limit

Subject to subparagraph (D), paragraph (1) shall not apply to an alien unless the alien demonstrates by clear and convincing evidence that the application has been filed within 1 year after the date of the alien's arrival in the United States.

###### (C) Previous asylum applications

Subject to subparagraph (D), paragraph (1) shall not apply to an alien if the alien has previously applied for asylum and had such application denied.

###### (D) Changed circumstances

An application for asylum of an alien may be considered, notwithstanding subparagraphs (B) and (C), if the alien demonstrates to the satisfaction of the Attorney General either the existence of changed circumstances which materially affect the applicant's eligibility for asylum or extraordinary circumstances relating to the delay in filing an application within the period specified in subparagraph (B).

##### (b) Conditions for granting asylum

###### (1) In general

(A) Eligibility

The Secretary of Homeland Security or the Attorney General may grant asylum to an alien who has applied for asylum in accordance with the requirements and procedures established by the Secretary of Homeland Security or the Attorney General under this section if the Secretary of Homeland Security or the Attorney General determines that such alien is a refugee within the meaning of section 1101(a)(42)(A) of this title.

(B) Burden of proof

(i) In general

The burden of proof is on the applicant to establish that the applicant is a refugee, within the meaning of section 1101(a)(42)(A) of this title. To establish that the applicant is a refugee within the meaning of such section, the applicant must establish that race, religion, nationality, membership in a particular social group, or political opinion was or will be at least one central reason for persecuting the applicant.

(ii) Sustaining burden

The testimony of the applicant may be sufficient to sustain the applicant's burden without corroboration, but only if the applicant satisfies the trier of fact that the applicant's testimony is credible, is persuasive, and refers to specific facts sufficient to demonstrate that the applicant is a refugee. In determining whether the applicant has met the applicant's burden, the trier of fact may weigh the credible testimony along with other evidence of record. Where the trier of fact determines that the applicant should provide evidence that corroborates otherwise credible testimony, such evidence must be provided unless the applicant does not have the evidence and cannot reasonably obtain the evidence.

(iii) Credibility determination

Considering the totality of the circumstances, and all relevant factors, a trier of fact may base a credibility determination on the demeanor, candor, or responsiveness of the applicant or witness, the inherent plausibility of the applicant's or witness's account, the consistency between the applicant's or witness's written and oral statements (whenever made and whether or not under oath, and considering the circumstances under which the statements were made), the internal consistency of each such statement, the consistency of such statements with other evidence of record (including the reports of the Department of State on country conditions), and any inaccuracies or falsehoods in such statements, without regard to whether an inconsistency, inaccuracy, or falsehood goes to the heart of the applicant's claim, or any other relevant factor.

There is no presumption of credibility, however, if no adverse credibility determination is explicitly made, the applicant or witness shall have a rebuttable presumption of credibility on appeal.

(2) Exceptions

(A) In general

Paragraph (1) shall not apply to an alien if the Attorney General determines that -

- (i) the alien ordered, incited, assisted, or otherwise participated in the persecution of any person on account of race, religion, nationality, membership in a particular social group, or political opinion;
- (ii) the alien, having been convicted by a final judgment of a particularly serious crime, constitutes a danger to the community of the United States;
- (iii) there are serious reasons for believing that the alien has committed a serious nonpolitical crime outside the United States prior to the arrival of the alien in the United States;
- (iv) there are reasonable grounds for regarding the alien as a danger to the security of the United States;

(B) Special rules

(i) Conviction of aggravated felony

For purposes of clause (ii) of subparagraph (A), an alien who has been convicted of an aggravated felony shall be considered to have been convicted of a particularly serious crime.

(ii) Offenses

The Attorney General may designate by regulation offenses that will be considered to be a crime described in clause (ii) or (iii) of subparagraph (A).

(C) Additional limitations

The Attorney General may by regulation establish additional limitations and conditions, consistent with this section, under which an alien shall be ineligible for asylum under paragraph (1).

(D) No judicial review

There shall be no judicial review of a determination of the Attorney General under subparagraph (A)(v).

(c) Asylum status

(1) In general

In the case of an alien granted asylum under subsection (b) of this section, the Attorney General

(A) shall not remove or return the alien to the alien's country of nationality or, in the case of a person having no nationality, the country of the alien's last habitual residence;

(B) shall authorize the alien to engage in employment in the United States and provide the alien with appropriate endorsement of that authorization; and

(C) may allow the alien to travel abroad with the prior consent of the Attorney General.

(2) Termination of asylum

Asylum granted under subsection (b) of this section does not convey a right to remain permanently in the United States, and may be terminated if the Attorney General determines that

(A) the alien no longer meets the conditions described in subsection (b)(1) of this section owing to a fundamental change in circumstances;

(B) the alien meets a condition described in subsection (b)(2) of this section;

(C) the alien may be removed, pursuant to a bilateral or multilateral agreement, to a country (other than the country of the alien's nationality or, in the case of an alien having no nationality, the country of the alien's last habitual residence) in which the alien's life or freedom would not be threatened on account of race, religion, nationality, membership in a particular social group, or political opinion, and where the alien is eligible to receive asylum or equivalent temporary protection;

(D) the alien has voluntarily availed himself or herself of the protection of the alien's country of nationality or, in the case of an alien having no nationality, the alien's country of last habitual residence, by returning to such country with permanent resident status or the reasonable possibility of obtaining such status with the same rights and obligations pertaining to other permanent residents of that country; or

(E) the alien has acquired a new nationality and enjoys the protection of the country of his or her new nationality.

(d) Asylum procedure

(1) Applications

The Attorney General shall establish a procedure for the consideration of asylum applications filed under subsection (a) of this section. The Attorney General may require applicants to submit fingerprints and a photograph at such time and in such manner to be determined by regulation by the Attorney General.

## (2) Employment

An applicant for asylum is not entitled to employment authorization, but such authorization may be provided under regulation by the Attorney General. An applicant who is not otherwise eligible for employment authorization shall not be granted such authorization prior to 180 days after the date of filing of the application for asylum.

## (3) Fees

The Attorney General may impose fees for the consideration of an application for asylum, for employment authorization under this section, and for adjustment of status under section 1159(b) of this title. Such fees shall not exceed the Attorney General's costs in adjudicating the applications. The Attorney General may provide for the assessment and payment of such fees over a period of time or by installments.

## (4) Notice of privilege of counsel and consequences of frivolous application

At the time of filing an application for asylum, the Attorney General shall -  
(A) advise the alien of the privilege of being represented by counsel and of the consequences, under paragraph (6), of knowingly filing a frivolous application for asylum; and

(B) provide the alien a list of persons (updated not less often than quarterly) who have indicated their availability to represent aliens in asylum proceedings on a pro bono basis.

## (5) Consideration of asylum applications

### (A) Procedures

The procedure established under paragraph (1) shall provide that -

(i) asylum cannot be granted until the identity of the applicant has been checked against all appropriate records or databases maintained by the Attorney General and by the Secretary of State, including the Automated Visa Lookout System, to determine any grounds on which the alien may be inadmissible to or deportable from the United States, or ineligible to apply for or be granted asylum;

(ii) in the absence of exceptional circumstances, the initial interview or hearing on the asylum application shall commence not later than 45 days after the date an application is filed;

(iii) in the absence of exceptional circumstances, final administrative adjudication of the asylum application, not including administrative appeal, shall be completed within 180 days after the date an application is filed;

(iv) any administrative appeal shall be filed within 30 days of a decision granting or denying asylum, or within 30 days of the completion of removal

proceedings before an immigration judge under section 1229a of this title, whichever is later; and

(v) in the case of an applicant for asylum who fails without prior authorization or in the absence of exceptional circumstances to appear for an interview or hearing, including a hearing under section 1229a of this title, the application may be dismissed or the applicant may be otherwise sanctioned for such failure.

(B) Additional regulatory conditions

The Attorney General may provide by regulation for any other conditions or limitations on the consideration of an application for asylum not inconsistent with this chapter.

(6) Frivolous applications

If the Attorney General determines that an alien has knowingly made a frivolous application for asylum and the alien has received the notice under paragraph (4)(A), the alien shall be permanently ineligible for any benefits under this chapter, effective as of the date of a final determination on such application.

# AFFIDAVITS

**AFFIDAVIT OF QUIN ZION**

1		
2		<b>UNITED STATES DEPARTMENT OF JUSTICE</b>
3		<b>EXECUTIVE OFFICE FOR IMMIGRATION REVIEW</b>
4		<b>IMMIGRATION COURT</b>
5		<b>SUPERIOR, MICHIGAN</b>
6	<b>IN THE MATTER OF</b>	)
7		)
8	<b>QUIN ZION</b>	) <b>Honorable Doris Huffman</b>
9	<b>A23 571 113</b>	) <b>Presiding Judge</b>
10		)
11	<b>In removal proceedings</b>	)
12		
13		<b>AFFIDAVIT OF QUIN ZION</b>
14		
15		Hello. My name is Quin Zion. I was born in Freedonia in 2001. Freedonia
16		is a beautiful country. The ocean is azure by John, which is the port city near
17		where I was raised. I used to collect sea shells there.
18		When I was young, we lived on a farm and raised Jersey and Guernsey
19		milk cows. I ran the milking operation. If one of the calves got loose, I would have
20		to search for the ma cow because she could always find her calf. We raised turkeys
21		and ate a lot of them too. We raised sheep, who cried baa. Rain was common
22		along the coast where I was raised.
23		Later, when I started school, I got a job where I racked bowling pins. That
24		was boring, unless there was a guy on a string of strikes, that is. Seen a gal hit 9 in
25		a row one time. That was at a reunion, oh man. That was fun. Then I got some jobs
26		

27 at various mall dives, can ya believe that? It raised my ire. Land was easier to  
28 work on than in those stores.

29 But we were hungry, so I had to work. We ate a lot of chili at home which  
30 had a lot of grease in it. I am not a hatey, but I grew to dislike seeing the china  
31 bowls or that pan of ma's.

32 When I was growing up, my country was ruled by a group of great people,  
33 the Spree. The Spree are also a religious group espousing the true faith. We had  
34 public gatherings to celebrate the birthday of the country, similar to your July 4th  
35 celebration. We also celebrated the birthday of our illustrious leader, Oprah Xram.  
36 I am loyal to my country and its real leaders. That is why, when they came to our  
37 school to ask for help in ferreting out some people who were trying to overthrow  
38 the country, I volunteered.

39 The other major party (and religion) is the Knaves. At parades members of  
40 the Knave Party would boo Tan, our local mayor. You crane your neck to see an  
41 important person only to have a rube, ah, get in the way. The Knaves would spread  
42 lies about our country and its leaders. The Knaves even proposed a different  
43 national anthem; they would sing a poor song at public gatherings. So I decided to  
44 help the government by providing information about these troublemakers and  
45 traitors.

46 I was given some training about some really cool spy craft stuff, like  
47 reading camera runes and den marks. I was asked if I could identify and or, uh,  
48 infiltrate the troublemakers. My handlers were Sam Oah and Dan Tine. They  
49 would gab on so much. Once I fell and got a germ in my knee while on duty but I  
50 did not want to sue Dan or Sam.

51 The infiltration was easy. The troublemakers would print out their lies and  
52 post them on telephone poles. They were so naïve; they even occasionally put  
53 contact information on their flyers. At the time this seemed silly, but perhaps they  
54 were just sincerely misguided. Dan used to say these people were traitors but it is  
55

56 possible that he gypped me with his talk about patriotism. I really believe in what  
57 Sam and Dan were saying. Maybe I should have checked out what they said.

58           Anyway, I joined a cell of the dissidents and became friends with some of  
59 them. We would often play soccer together. Naturally, I prepared and submitted  
60 reports to my supervisors about the people I met. The only people I remember  
61 telling on were Sue Matra, Al Bania, Bo Livia, and Nick Aragua. I heard a lot  
62 about a Libia Nauru but I never met her. There might have been a Georgia too but  
63 I did not learn her last name. There might have been others. Sometimes if I  
64 thought they were just sincere though misguided, I would omit their information in  
65 my reports.

66           I met Sean Gallagher at a Battle Ball game. S/He/They drew cartoons.  
67 S/He/They would tie her/his/their cartoons onto telephone poles. Once after a coed  
68 Battle Ball game, Gallagher showed me a cartoon of a ventriloquist standing with  
69 his foot on the neck of a person labeled Knave. The word bubble had the dummy  
70 saying something about free speech. It was outrageous and seditious. I asked, “did  
71 ya make a lot of those?” My plan was to take one to attach to my report. No such  
72 luck. Not long after that, s/he/they moved out of town and I never saw  
73 him/her/them again until recently. Imagine my surprise when s/he/they showed up  
74 in Superior, Michigan. More on that later.

75           Occasionally, one of the people I reported about would move to a different  
76 town to carry on their underground conspiracy to destroy Freedonia. At least that  
77 is what I was told by Sam and Dan. Either way, I never saw anyone I reported  
78 about get directly harmed in any way. And of course, I never hurt anyone myself.  
79 It is not my fault if some fringe member of the government overreacted  
80 occasionally. It is not like there was a government wide policy of harming  
81 dissidents.

82           In June 2018, I graduated from high school. Freedonia is really quite similar to the  
83 United States in some ways. English is our second language and almost everyone  
84 can speak it. Our school systems are also quite similar, with divisions between

85 grades. Of course, our schools are better than yours until you get to high school  
86 and university. Many kids from Freedonia travel to the United States to complete  
87 high school and to get into a university.

88 That is what I did. I obtained an F-1 visa and a host family and came to  
89 Superior, Michigan. Freedonia paid for my schooling in the United States until the  
90 election, that is. I left Freedonia in the Summer of 2018 to come here to university.  
91 Around December of 2019, I received a letter from Freedonia's Knave  
92 government telling me that they were no longer going to invest in my education.  
93 They ordered me to return to Freedonia. Because my parents could not afford to  
94 pay for my schooling, I left school. The university notified the Immigration  
95 authorities that I was not attending. Immigration told me they were revoking my  
96 visa and that I would need to go back to Freedonia. I enrolled in two on-line  
97 classes in an attempt to reinstate my student status, but it must have been too little  
98 or too late.

99 After I came to the United States, via Uganda, the United Arab Emirates,  
100 and the United Kingdom, there was a coup in Freedonia. The minority (well,  
101 actually, there are numerically a majority, but they never held so many offices in  
102 government before) took over. They said there was an election and that they  
103 received a majority of the votes. There is no way President Oprah Xram would  
104 allow that.

105 Immediately after the election, I started hearing that the Knaves were  
106 arresting and punishing anyone they thought might have cooperated with the  
107 former government. Actually, the official government is claiming that they are not  
108 persecuting patriotic people like me and the government is blaming vigilantes for  
109 the danger to folks like me but I know the government is making no effort to curb  
110 the attacks against us. Many of my friends and acquaintances in Freedonia,  
111 reported that they have lost jobs mysteriously or were otherwise economically  
112 disadvantaged just because they had previously been supportive of the

113

114 government. I am also hearing reports of attacks by bandana wearing Knaves  
115 which are not being controlled by the police.

116           Naturally, I was worried about myself and my family. I learned that my  
117 parents, Mo and Sam Bique, lost their business when they lost their license to  
118 import Cyprus trees or to brew Ny, a local coffee like drink. Also they were  
119 accused of being behind on their business taxes, as if everyone else is current on  
120 theirs. My parents said there is a warrant for my arrest for questioning. My parents  
121 also reported that several people (not officially connected with the government, I  
122 guess) have come around asking how to contact me. These people were wearing  
123 bandanas and were verbally abusive to my parents. I have examined Exhibit # 2  
124 and declare that this is a true and accurate copy of the letter I received from my  
125 mother before I filed my asylum claim. And Exhibit #3 is a true and accurate copy  
126 of the last letter from my mother.

127           My friends report that some of our mutual acquaintances have disappeared  
128 without a trace. I know this sounds similar to the people I reported on who were  
129 moving from town to town. I guess I do not really know if Dan or the other people  
130 in government when I was there really did anything. I never meant to hurt anyone.

131           Within twelve months of my entering the United States, but after the  
132 regime change and when I started to hear about the repression of the new regime, I  
133 applied for asylum here. I have reviewed Exhibit #1 and it is a true and accurate  
134 copy of the I-589 I filed.

135           I met with Jules Leonard, who is the USCIS agent who was supposed to be  
136 confirming my asylum claim. I apologized profusely for having missed my first  
137 appointment and then for being a few minutes late to the rescheduled one. In  
138 Freedonia, time is a flexible commodity. Agent Leonard did appear a little put out  
139 by the delay and in general looked pretty harried. Through the questions that  
140 s/he/they asked me, s/he/they appears to be working for the new regime. Although  
141 I truthfully disclosed my sincere and patriotic activities in reporting troublemakers  
142 back home, s/he/they accused me of being involved in persecution. S/He/they also

143 said that my credibility was weak because I did not look her/him/them in the eyes.  
144 In my culture it is not polite or wise to look directly at an authority figure.

145 S/He/They also said that Freedonia is now a safe and peaceful place  
146 because the Knaves said so. I explained that Spree cannot summon the police  
147 when the vigilantes attack us. The agent said that might be true but I could not  
148 show when I, personally, was going to be attacked and besides, the Knaves  
149 reported that the gangs of Knaves were going to disband or had disbanded or  
150 something. S/He/They said I would have to return to Freedonia and then smiled at  
151 me. S/He/They told me that what was happening in Freedonia is what always  
152 happens around a regime change. S/He/They said that there is really no religious  
153 persecution and no genuine reason to fear the Knaves since they are allies of the  
154 United States, as far as s/he/they is concerned. I tried to point out in a calm and  
155 rational way the danger that I would face should I return to Freedonia. At a  
156 minimum, I will be subject to sharp rebuke from the new Knave government. I  
157 will not be able to travel freely to other countries. I most likely will not be able to  
158 continue my education. Depending on the mood of the government at the time, I  
159 may be subject to arrest and imprisonment – or worse. There is every possibility  
160 that I may be “disappeared” and the world might never see Quin Zion ever again.

161 I never persecuted anyone. So now, I am being told I may have to return to  
162 Freedonia, although I have a well founded fear of persecution if I return there. I  
163 fear I may just disappear. My family business has already been harmed despite the  
164 fact that I never did anything to anyone. It is so weird, I ran into Shean Gallagher  
165 after I filed for asylum. S/He/They looked familiar. I was in the store having a  
166 malted, I do buy grenadine for mine. That is when I saw that traitor/snitch,  
167 Gallagher. S/he/they even spoke our native language, although we both used  
168 English. S/he/They was obviously trying to pretend to fit in here.

169 Only later did I learn that s/he/they is working for the authorities here to  
170 create false reports about people who may have had a connection with the former  
171 government. I did not make the connection with the cartoon until I got the

172	discovery in this case. S/He/They obviously has a clear bias against me.
173	Her/His/Their testimony clearly establishes that my fear about returning is well
174	founded.

**AFFIDAVIT OF PARKER WREN**

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**UNITED STATES DEPARTMENT OF JUSTICE**  
**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**  
**IMMIGRATION COURT**  
**SUPERIOR, MICHIGAN**

**IN THE MATTER OF** )  
 )  
**QUIN ZION** ) **Honorable Doris Huffman**  
**A23 571 113** ) **Presiding Judge**  
 )  
**In removal proceedings** )

**AFFIDAVIT OF PARKER WREN**

My name is Parker Wren. I was born in the little town of Trentino, Freedonia. I have lived there all of my life, until recently. My ancestors lived in Trentino, Freedonia all of their lives. I am a believer, as were all of my ancestors before me. I am a member of the Spree Party, as were all of my ancestors.

In Trentino, I owned a little restaurant called Horsefeathers. I was the chef, the waiter/waitress/server, dishwasher, the janitor and the boss. My family worked with me. We did not trust any outside workers, especially those lazy, good for nothing, non-believing Knaves.

Our specialty was duck soup. We have a secret family recipe which was handed down from my mother, who had it handed to her from my grandfather, who got it from his father. Horsefeathers and our special duck soup were quite famous in Freedonia. We had visitors from all over the Country. We even were visited by Oprah Xram, the former president of Freedonia. He had heard many

28 good things about our eating establishment and wanted to try our famous duck  
29 soup. He was full of praise and left a large tip. Oprah Xram is the head of our  
30 party, the Spree Party, and a good believer. My family and I were very honored to  
31 have such an important person visit us.

32 We had a good business and life was good for me and my family.  
33 However, that all changed with the election in November, 2018. It was on 11  
34 November 2018 that the Knaves won (more like stole) the elections. Oprah Xram  
35 was allegedly voted out of office and the new president, Waxing Roth took over.

36 Roth was the leader of the Knave Party and a big non-believer. He hated us  
37 believers, who all belong to the Spree Party. It goes without saying that if you  
38 were a non-believer, you were a Knave and if you were a believer, you were a  
39 Spree.

40 Immediately after the election, Roth began to initiate his “reforms.” The  
41 first “reform” was to appoint all of his non-believer, Knave cronies to government  
42 jobs. He replaced everyone, from the members of the rule-making body to the  
43 person that catches stray animals. Everyone in authority was a Knave and they  
44 owed their jobs and their allegiance to Roth. In other words, they were all Roth’s  
45 stooges.

46 Our troubles began when Roth appointed Russell Parrish as the new Health  
47 Inspector for Trentino. Parrish was my arch enemy. He was the stereotypical  
48 non-believer Knave – lazy, dishonest, corrupt, and he hated me. We had known  
49 each other since childhood and had hated each other through the years.

50 Before the election, Parrish came to our restaurant once. I was in the back  
51 cooking, or I would never have let him in. He ordered our famous duck soup.  
52 When it came, without even trying it, he began to shout in a loud voice, “this soup  
53 tastes terrible, it has bugs in it!” My cousin, Dinkla Xram, was sitting at the table  
54 next to him and saw the whole thing. Dinkla said that when the soup came, Parrish  
55 reached into his pocket and threw something into his soup. The two men started a  
56

57 fight and when I came out and saw who it was, I kicked Parrish out and ordered  
58 him never to set foot in Horsefeathers again.

59 My worst nightmare was realized when Parrish was made the health  
60 inspector. He wasted no time in pulling my permit and shutting us down. I  
61 complained to the Mayor. I complained to the Governor. I even sent a letter to  
62 Waxing Roth himself, but because I was a Spree and they were all non-believer  
63 Knaves, no one would listen. The Mayor just laughed at me. He said, “All you  
64 filthy Spree have had it too good for too long. Now you will see what it’s like to  
65 have a government that refuses to do anything for you.

66 When I tried to sell Horsefeathers, no believer could get a loan or permits  
67 to operate it. The Mayor told me I needed to sell Horsefeathers to a Knave. I told  
68 him I would never sell to a Knave.

69 The mayor replied, “We will see about that. I have it on good authority that  
70 you haven’t paid your taxes. I hereby order the Constable to sell your restaurant to  
71 pay the taxes.” I admit that I was six months late in paying my taxes, but that was  
72 nothing new. I was always six months late in paying my taxes. Everyone in  
73 Trentino was six months late in paying their taxes and it had never been a problem  
74 before. (The irony is that the Knaves are notorious for not paying their taxes. In  
75 fact, that was one of the big issues on the campaign. The slogan was, “Knaves  
76 don’t mind raising taxes, because they don’t pay them.”) All of my taxes were  
77 declared due and delinquent at once. The very next day, the Constable sold  
78 Horsefeathers to a Knave named Teasdale for next to nothing. They didn’t even  
79 advertise in the newspaper or post a sale bill. You can ask anyone, the whole thing  
80 stunk.

81 That was it. We were done. After generations of serving great meals,  
82 Horsefeathers now belonged to a Knave, a non-believer Knave.

83 But the joke was on Teasdale. Knave stooge Teasdale may have bought  
84 (stole) Horsefeathers, but he did not buy the recipe for making duck soup. Without  
85 the recipe and without me to cook, I doubt he will be very successful. It serves him

86 right. It serves all of them right. (Do you want to know the recipe for Knave duck  
87 soup? First, steal a duck.)

88 After that, I could not get a job anywhere. The Knaves controlled the jobs.  
89 They would not hire anyone that was a member of the Spree Party. My family  
90 ended up homeless and starving in less than two months after the Knaves came to  
91 power. We resorted to “dumpster diving” behind our own restaurant. If Teasdale’s  
92 food was bad when you ate it in the restaurant, you should taste it after it has been  
93 in the dumpster for awhile. I did not think it possible to sink so low.

94 Desperate, I called my relatives in Superior, Michigan, in America. They  
95 said, “You and all of the other believers are being persecuted in Freedonia. You  
96 need to come to America so that you can be free. You need to come to America  
97 and make your famous duck soup.”

98 My relatives took up a collection for us in America. You have such good  
99 people here. They wired us the money and we prepared to go to America.

100 However, the non-believer Knaves were not done with us. First, they kept  
101 “losing” our applications for visas. Ultimately, we were told that we could not go  
102 to America. They would never put anything in writing, they would just tell us we  
103 couldn’t go.

104 We then devised a plan. We would slip across the border to the  
105 neighboring country. From there we would obtain forged documents and go to  
106 America. Although it sounds like a simple plan, believe me, there was nothing  
107 simple about it.

108 First, the Knaves knew that we wanted to leave Freedonia, so they watched  
109 our every move. They assigned a Knave flunky to follow each of us around.

110 Second, Trentino was in the middle of Freedonia and we were a long way  
111 from the border. They had plenty of opportunity to stop us if we traveled as a  
112 group to the border.

113 Finally, it was winter in Freedonia and very cold. That was one of the  
114 biggest problems. We fooled them by splitting up and going separate directions.

115 When questioned, one of us would tell them they were looking for work. Another  
116 family member would say he was looking for firewood. Other family members  
117 said they were going to shop or to visit a relative. We had dressed warmly for the  
118 day because it was cold, but we only had that one set of clothes and could carry no  
119 others, so as not to arouse suspicion.

120 Each of us then “ditched” the Knave flunky that was following us. We all  
121 met at a designated spot in the woods. We traveled at night along the rural roads  
122 and slept by day in the woods or in a farmer’s barn. We were careful not to be  
123 seen. I am somewhat embarrassed to admit that we occasionally “borrowed”  
124 blankets, clothing, or anything else we could scavenge from some of the  
125 farmhouses that we passed along the way. If we hadn’t, we would not have  
126 survived.

127 A river divides Freedonia and the neighboring country of Sylvania. We  
128 “borrowed” a boat and crossed at night when the border guards for both countries  
129 were not looking. That was a scary time. Cold and miserable, we didn’t know if  
130 we were going to be captured, or shot, or if our “borrowed” boat would sink and  
131 we would all drown. We gave thanks to our Maker when we arrived safely on the  
132 other side of the river.

133 I cannot tell you how or from whom, (because we were sworn to secrecy)  
134 but once in the neighboring country we were able to obtain forged documents.  
135 With those forged documents, we were able to obtain visas and fly to America.

136 So here I am. My family and I made it. We have been granted asylum. We  
137 now have a roof over our heads. We can practice our religion and live in peace  
138 with other believers. We have plenty to eat and we have opened a restaurant called  
139 “The Best of Freedonia” where we make our famous duck soup. You must come  
140 and try some. It really is good.

141 To this day, I keep in touch with my spiritual advisor, Anderson Anderson  
142 back in Trentino. He says things are still not good for the Spree. Attendance at our  
143 religious ceremonies is way up, but contributions are way down. The Spree are

144	unable to get jobs and have no money to donate. Anderson Anderson even asked me for a donation, which I was happy to send to him to support the activities of all devout Spree in Freedonia.
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**AFFIDAVIT OF RANKIN BASS**

1	<b>UNITED STATES DEPARTMENT OF JUSTICE</b>
2	<b>EXECUTIVE OFFICE FOR IMMIGRATION REVIEW</b>
3	<b>IMMIGRATION COURT</b>
4	<b>SUPERIOR, MICHIGAN</b>
5	
6	<b>IN THE MATTER OF</b> )
7	)
8	<b>QUIN ZION</b> ) <b>Honorable Doris Huffman</b>
9	<b>A23 571 113</b> ) <b>Presiding Judge</b>
10	)
11	<b>In removal proceedings</b> )
12	
13	<b>AFFIDAVIT OF RANKIN BASS</b>
14	
15	My name is Rankin Bass. I am a bit of a free spirit—if I do say so myself. I
16	grew up in Michigan except for the period of time my family lived in Freedonia.
17	My parents were missionaries and when I was six we moved to Freedonia. My
18	father taught at a school funded by the church. Mom was a nurse at the free clinic.
19	My brothers and sisters and I loved living in Freedonia. I became friends with
20	many children there. I had no idea what was going on politically in Freedonia – I
21	just knew that I was on a big adventure. After living in Freedonia for three years,
22	the donations that kept the school open dried up and my parents made the decision
23	to bring us back to the Midwest.
24	I eventually graduated from Erie High School and attended Superior
25	International University for several years. I was well on my way to becoming a
26	professional student. I was majoring in sociology and anthropology, but I

27 eventually realized that I needed to get out into the world. Life’s experiences will  
28 teach me more than those professors in their ivory towers ever will. You know what  
29 they say, those who can, do and those who can’t, teach.

30 I decided that I needed to move on and became involved with the  
31 organization “With One World” (WOW for short). WOW is a humanitarian group  
32 started by several discontented computer geeks who want to get computers and  
33 Internet access to the world’s poorest children.

34 When I saw their mission statement in a flyer at the campus Union, I was  
35 hooked. It said:

36  
37 Mission Statement: To create educational opportunities for the world's poorest  
38 children by providing each child with a rugged, low-cost, low-power,  
39 connected laptop with content and software designed for collaborative,  
40 joyful, self-empowered learning. When children have access to this type of  
41 tool they get engaged in their own education. They learn, share, create, and  
42 collaborate. They become connected to each other, to the world and to a  
43 brighter future.

44  
45 I immediately contacted WOW’s recruiting coordinator and said “Sign me  
46 up!” Even though I have no technical computer skills, they told me they loved my  
47 drive and thought my life experiences would prove invaluable. It could not have  
48 been better timing. WOW was looking to expand their efforts in Freedonia and  
49 needed a liaison. I had always wanted to find my way back to Freedonia and this  
50 was my ticket.

51 I was taken immediately from customs to the Federal Building when I  
52 arrived in Freedonia as a WOW Ambassador. Spree Party officials interviewed me  
53 at length about my intentions in coming to Freedonia. An official named Moser  
54 appeared to doubt what I was saying even though I told her all I wanted to do was  
55 help educate the children of Freedonia. I even told Moser about my family’s time in

56 Freedonia and how much we loved its people. As soon as I mentioned my father,  
57 Cook Bass, I was whisked away to another official's office. Moser did not tell me  
58 what was happening and it was a little disconcerting. An imposing man in a  
59 military uniform, Captain Spaulding, was there to greet me. Spaulding had a huge  
60 smile on his face and told me that he knew my father when my family lived in the  
61 village of Eritrea. Spaulding told me how my father had taught some of his nieces  
62 and nephews from the village. He said that even though our families practiced  
63 different religions, my father always treated his family with respect. He said that  
64 any child of Cook Bass was a child of his. With that, all of my paperwork was  
65 signed and I was on my way. Spaulding told me that if I ever needed anything, to  
66 contact him directly. Fortunately, I never had to.

67 I lived in Trentino with two other WOW Ambassadors for two years. It was  
68 exhilarating! We were able to accomplish so much. Watching the children as they  
69 discovered how to use their new computers was inspiring. Their minds were like  
70 sponges and the world was now at their feet.

71 Of course, I had some free time while I was there. On my days off, I would  
72 spend time in the open-air markets. Everyone was so friendly. Some of the shop  
73 owners felt comfortable enough around me to talk politics. Many of them were  
74 members of the Spree Party. They were worried about the upcoming election. The  
75 Spree Party had been in power much longer than expected and they sensed that  
76 Knave Party members were planning on pushing the Spree Party out of the  
77 government. I could not understand why there seemed to be such a movement for  
78 change. The people I talked to appeared to be living a satisfying life with the Spree  
79 government. Don't get me wrong, people were poor, but if people worked hard,  
80 they had a chance to provide for their families.

81 I've heard the allegations that the Spree Party was persecuting members of  
82 the Knave Party while they were in power. I did not observe anything like that.  
83 There were a few times that I saw people tearing down Knave Party posters, but I  
84

85 assumed it was just people with a strong difference of opinion. It certainly did not  
86 seem like an organized movement or that the government was involved.

87           On one occasion, I overheard a man who was selling home-made pastries at  
88 the market telling his wife that the reason no one was purchasing their goods was  
89 because the Spree Party made them outcasts. He said that he thought the Spree had  
90 spies coming to the Knave Party organization meetings that reported who was in  
91 attendance. He felt that it was not just a coincidence that his business declined  
92 shortly after he started going to the meetings. In my opinion, his pastries were not  
93 very good. Maybe that had something to do with his lack of customers.

94           Many of my Spree friends were passionate about their country and their  
95 party. They would often say that they would do what was asked of them to keep the  
96 Spree in power. I assumed they meant campaigning and organizing. There was  
97 often talk that if the Knaves gained power, Freedonia would not be so “Free.” They  
98 would often greet each other and say “Spree and Free.”

99           As the November election approached, I could see the tensions mounting.  
100 There was a lot of rhetoric from both sides. It was pretty clear that whatever party  
101 won, many people were going to be unhappy.

102           On Election night, I stayed close to my apartment with my WOW friends. I  
103 watched people come out of their homes as it became clear that the Knaves won the  
104 election. I had never seen anything like it before. People were cheering and waving  
105 the Freedonian and Knave flags. Other people were shouting and saying that life as  
106 they knew it was over. Neighbors were pitted against neighbor. There was even talk  
107 that the election was a fraud and that President Roth should be removed from  
108 office.

109           One of my WOW friends told me that he saw people starting fires in the  
110 streets on his way to my apartment. I also heard about people throwing rocks at  
111 each other. I was surprised that people were reacting this way. I knew that the  
112 election was hotly contested, but had no idea that people were so afraid of the  
113 regime change. I guess in my short time in Freedonia, it never struck me that the

114 Knave opposition might actually win the election – and what that would mean for  
115 Freedonian society.

116 In the weeks following the election, the Knave government stepped up the  
117 military presence. Men in uniform were everywhere. People stopped talking so  
118 openly in the markets about their views. It looked to me like many people were  
119 afraid. To be honest, I was concerned, too. I heard stories about former Spree  
120 supporters disappearing in the middle of the night. Several thriving businesses were  
121 suddenly boarded up.

122 Approximately three weeks after the election, I was told by WOW that the  
123 organization was temporarily leaving Freedonia. They pulled us out in a matter of  
124 days. WOW’s position was that the government had become too unstable to ensure  
125 our safety. Attached is a copy of the e-mail we all received from the Director of  
126 WOW, Robert Waterman, himself telling us it was time to leave.

127 When I came back to Michigan, I re-enrolled in classes at the University. I  
128 know, I know. I said I would never go back to school. Because I didn’t know what  
129 my next step in life would be, I decided to take a break and try to finish my degree.  
130 Perhaps, WOW’s mission of educating the world’s poorest children helped me  
131 realize the importance of my own education.

132 One of the benefits of going back to IIU, was that I got involved in the  
133 Students for Freedonia group. That’s how I met Quin Zion and many other students  
134 from Freedonia. I couldn’t help but feel sorry for Quin. Based on what I saw after  
135 the election, Quin has a right to be worried about what would happen if s/he/they is  
136 sent back to Freedonia. I told Quin I would do whatever I could to help and that’s  
137 why I’m here today.

138 By the way, I’ve read the State Department’s report about the current state  
139 of affairs in Freedonia. I think it’s a bunch of baloney. I still have friends there and  
140 when they can find access to the internet, (I’m told sometimes the Knaves block  
141 access), they e-mail me stories of friends waiting in prison for a “trial” that never  
142 seems to happen. What crimes they are guilty of, no one can seem to tell me.

143

I recently heard that WOW was starting to send volunteers back into the country. Crazy. I will not go back as long as the Knaves are in power.

144

145

It's my opinion that if Quin Zion is not given asylum, s/he/they will be taken immediately to jail. S/he/they will not be safe. And s/he/they may just end up "disappeared" like so many other Spree in Freedonia.

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148

**AFFIDAVIT OF SHEAN GALLAGHER**

1	<b>UNITED STATES DEPARTMENT OF JUSTICE</b>
2	<b>EXECUTIVE OFFICE FOR IMMIGRATION REVIEW</b>
3	<b>IMMIGRATION COURT</b>
4	<b>SUPERIOR, MICHIGAN</b>
5	
6	<b>IN THE MATTER OF</b> )
7	)
8	<b>QUIN ZION</b> ) <b>Honorable Doris Huffman</b>
9	<b>A23 571 113</b> ) <b>Presiding Judge</b>
10	)
11	<b>In removal proceedings</b> )
12	
13	<b>AFFIDAVIT OF SHEAN GALLAGHER</b>
14	
15	My name is Shean Gallagher and I am a proud resident of Freedonia. Well,
16	proud now that the Knaves are in power and the dark days of the Spree are behind
17	us. I have been here in Michigan visiting for about a month. There is a group of
18	Freedonians who emigrated to mid-Michigan including one of my best friends. So I
19	came up here to visit, see the United States and catch some National Battle Ball
20	Association games. That sport has really taken off in Freedonia! I'll go back home
21	after Quin Zion's hearing.
22	One evening, my friend and I went to a restaurant called "Best of
23	Freedonia" here in Superior for some real food, and I overheard two of the servers
24	talking about Quin Zion having some sort of immigration hearing. I broke out in a
25	cold sweat when I heard Zion's name. I quickly looked around the restaurant and
26	saw the door closing and someone's back as they walked out; I don't know if that
27	

28 was Zion who was leaving, and if it was I'm glad we didn't come face to face. I  
29 may have snapped and attacked him/her/them.

30 First thing next morning I called the Freedonia consulate in Chicago to tell  
31 them that a no good rat like Zion was apparently trying to avoid going back home  
32 to be held to account. The person I talked to said they'd get back to me.

33 Two days later someone called from the consulate, said they were very  
34 interested in seeing that Zion got back to Freedonia, that her/his/their name was on  
35 some sort of watch list and told me I should contact the local Immigration office. I  
36 was to tell the ICE office what I knew about Zion and ask if they wanted me to  
37 testify. The Freedonia Consulate even offered to pick up the costs of my extended  
38 stay in the United States if I would stay until the Zion situation was resolved. So I  
39 did. After hearing what I had to say, the ICE office set up a meeting, asked me to  
40 swear out this statement, and told me the date, time and place for the hearing.

41 Sure, I knew Zion when s/he/they was back home. We were in the same  
42 Battle Ball club, and would play pickup games together once or twice a week, after  
43 Zion was done with school and I was done with work for the day.

44 I'm about 5 years older than Zion and was managing a gas station and  
45 convenience store at the time. It paid the bills for me and my pet frogs. I had 33  
46 rare frogs at my house -- they took up my whole garage and part of my yard. Yeah,  
47 I had my own house then. It wasn't very big, but it was mine. My life was simple. I  
48 wasn't involved in politics -- never been a member of the Knave or Spree Party --  
49 and I'm not into religion like a lot of those holier-than-thou Spree people.

50 About three years ago things really started to change in the way the Spree  
51 ran the country. You noticed it everywhere -- in what did and didn't get reported on  
52 the news, when people you knew were just suddenly gone with no notice, and I  
53 started noticing it at work. The government vehicles -- you could always tell them  
54 because they were the same shade of grey and had tinted windows -- would pull up  
55 to the store, fill up their tanks and then waive an official badge in my face instead  
56 of paying.

57                   Then one day two Spree agents took half the magazines off the rack and  
58 told me never to stock those magazines again. Then the government price controls  
59 came in, and the special "assessment" began. That meant a bureaucrat showed up  
60 once a week and took 20% of our revenues, on top of the regular taxes.

61                   That's when I started my fliers. Made them on my home computer, and I'd  
62 sneak out at night and nail them to trees and electrical poles. Most of them were  
63 just a few words, like, "Freedom not Spreedom" Or I'd do these cartoons, like one  
64 of the head of the national security department putting his foot on the neck of a  
65 citizen. Nothing sophisticated. I just wanted other people to know that they weren't  
66 alone -- that others of us saw what was happening.

67                   I'd post maybe ten fliers a night, the whole time keeping an eye out for  
68 headlights of those government SUVs or minivans. There was a 10:00 o'clock  
69 curfew you see.

70                   I also found some websites where people posted comments, in code, but  
71 after a few weeks of reading them I could usually figure out where people would be  
72 meeting. Like under a bridge in a park. Three or four people would show up and  
73 we'd share what we were doing. Some people were hacking into government  
74 computer systems to try to infect them with viruses. Some were trying to disable  
75 security service vehicles with bricks, nails in tires or even these crude pipe bombs.  
76 I didn't do that stuff. My stuff was strictly nonviolent.

77                   One day at the Battle Ball field we were done playing and I offered Zion  
78 some refreshing pickle juice. This was in like April of 2010. I had a cooler in the  
79 trunk of my car. So we were sitting there on my car having a drink and cooling  
80 down when Zion said something like, "I understand you're doing good work for the  
81 cause," and said some other things that made me think s/he/they was going to the  
82 same websites as me.

83                   So, stupid me, I pulled out my backpack and got out the newest flier I had  
84 created. To the best of my recollection, it was just a cartoon of the then-President  
85 Oprah Xram as a carnival ventriloquist holding a dummy that was saying,

86 "Government control? What government control?" That's all I remember being on  
87 that poster, though I suppose there could have been other details. I had just done it  
88 the night before and no one else had seen it. Zion laughed and complimented me.  
89 We finished our drinks and went our separate ways.

90 At 4 a.m. the following morning I was roused out of bed by the doorbell. I  
91 figured maybe it was my alcoholic neighbor, locked out again. But there they were  
92 -- everyone's worst nightmare -- six uniformed Spree agents on my porch and two  
93 of those grey tinted window minivans parked in front of my house. Before I could  
94 ask if I could help them I felt a searing pain in my eyes -- pepper spray -- and I  
95 was thrown to the floor.

96 They twisted my arms behind me and handcuffed me, though not before I  
97 landed a punch or two swinging blindly. That was the "resisting arrest" they kept  
98 accusing me of when I was locked up. As they drug me out to one of the vehicles I  
99 could hear my furniture being overturned, and one of them laughed and asked  
100 another how frog legs tasted fried. Another one of them said to me, "Who's the  
101 puppet now?" And at some point one of them said, "Maybe you should be a little  
102 more careful who you play ball with." So I knew it was Zion who had ratted me  
103 out; no one else at the battle ball club had seen the new flier with the ventriloquist  
104 dummy.

105 It's just an empty lot now where my house once stood; I don't know exactly  
106 when they bulldozed it or what they did to my frogs. Because for the next seven  
107 months I lived in an eight by ten room. A cot, a toilet, a sink, one chair and two  
108 changes of puke green clothes. Everything else in the room was colored  
109 institutional grey and the fluorescent light fixture in the ceiling hummed all day and  
110 all night. You couldn't turn it off. Eventually I learned how to sleep with that thing  
111 on.

112 I did sets of push-ups and sit-ups four or five times a day to try to keep in  
113 shape, and for most of the day I'd just close my eyes and try to replay in my mind  
114

115 all the great soccer games I'd seen on TV or played in. You had to do something to  
116 keep it together.

117           Sometimes they'd turn the thermostat way down so you'd shiver all night  
118 long. Other times they'd turn it up -- for about a week it must have been 90 degrees  
119 in that room. I passed out eventually -- dehydration I suppose -- until one of the  
120 nicer guards poured a bucket of cool water on my head and gave me a canteen of  
121 water to drink. He said not to tell anyone he'd helped me.

122           The only way to keep track of time was the three meals a day slid through a  
123 flap in the door. No, I didn't starve, but I did lose 15 pounds.

124           Sometimes in the middle of the night bad rock and roll music -- with the  
125 lyrics in some foreign language -- would blast into the room from this old metal  
126 speaker in the ceiling. No warning; it would just start. It would last for hours. I  
127 couldn't tell if it was the same song over and over, or if the song never ended in the  
128 first place. Eventually my hearing would fade out so that it was just a sensation of  
129 it pounding into my head. I still have ringing in my ears and the doctor says I've  
130 lost 25% of the hearing in my left ear. And still to this day those weird,  
131 incomprehensible lyrics will run through my head -- "Inagaddadavida." Something  
132 like that. I still don't know what language it was.

133           Once a week we got to shower, go out into this dirt and crabgrass courtyard  
134 for an hour, and then we were taken by guards appear in this conference-looking  
135 room in front of this government official. She was creepy -- maybe 60 years old,  
136 hair buzzed like a soldier, and these green tinted glasses.

137           She'd ask if I was ready to start the healing process by admitting what I had  
138 done and cooperating by helping to catch the really dangerous criminals who were  
139 trying to hurt people. I was charged with subversive activities, criminal conspiracy  
140 and resisting arrest. But the charges would be dropped if I gave the names and  
141 email addresses of the other "co-conspirators." This was just a failure to  
142 communicate and she would help me get my mind right. So she said every week. I  
143 always said the same thing: I hadn't done anything wrong and I wanted to call a

144 lawyer. She'd smile at me, say my court hearing had been continued again, close  
145 my file and then back to the room I'd go.

146 No, I wasn't ever beaten in that place, and I didn't get any broken bones,  
147 dislocated joints, scars, or anything like that. I think they were too smart to beat  
148 people up, so that in case any pictures or video got out we would look halfway  
149 healthy.

150 Then it happened one day. It was in November, 2018, though at the time I  
151 had no idea what month it was. There was this commotion outside my door.  
152 Gunshots. Yelling and screaming. Then these two people dressed in jeans, t-shirts  
153 and bandanas around their heads kicked my door down. One of them had a shotgun  
154 and the other a pistol. They said, "You're free! We won the election!"

155 Later that day I learned these people were Knave Party activists. At that  
156 moment I had no idea what it all meant, but I didn't stick around to ask questions.  
157 As I ran out of that building I did see some of the Knave people wearing bandanas  
158 beating up on the guards -- kicking them and smacking them with their guns, I  
159 mean.

160 I stepped in front of one guard -- the nice one who'd given me the water --  
161 and told the Knave people to leave him alone, that he was okay. They looked at us  
162 for a minute, then moved on, and I led the guard out of there. He thanked me and  
163 ran off into the woods.

164 At that point I turned around to look at the building. That's when I saw that  
165 it was an old abandoned government asylum -- you know, for the mentally ill --  
166 where I had been for the last seven months. Well, I did almost go crazy in there, but  
167 now with the help of some medication and counseling I'm getting on with my life.

168 I'm managing one of the government-owned gas stations -- at least this new  
169 Knave government is honest about the fact that they are running it -- and even  
170 starting to play a little soccer again with the few old friends who are still around.

171 Persecution in Freedonia now? I haven't seen anything bad. The worst thing  
172 I've seen is one day a few months ago -- May of this year, I think -- someone came

173 running through the station parking lot and a couple seconds later a pickup came  
174 tearing after him. The people in the pickup were wearing the same kind of  
175 bandanas as the people who set me free from the asylum. That's kind of the badge  
176 of the Knave supporters -- the bandanas.

177           So anyway, the pickup caught up to the guy a block or so away from the gas  
178 station, and a couple of people jumped out of the bed of the pickup, tackled the guy  
179 who'd been running, and were punching and kicking him. It lasted maybe 20  
180 seconds, then they jumped back in the pickup and drove off.

181           By that time I had made it down to where it was happening, and it looked  
182 like the guy had a broken nose. Blood all over his face. I walked him back to the  
183 station, gave him a washcloth, let him use the bathroom, and offered to call an  
184 ambulance or the police. But he wouldn't let me -- said something about how the  
185 police won't do anything for him because he worked in the old Spree government.

186           I didn't ask any other questions or say much else; as you can guess, I'm not  
187 too crazy about people who had anything to do with the old government. I guess I  
188 have noticed that when you call the police or some other government agencies --  
189 like to ask about getting your driver's license renewed or something -- they ask you  
190 if you ever worked for the Spree or been a Spree member.

191           Anyway, that's the worst thing I've seen, and compared to what the Spree  
192 did to a lot of other people and me, that's nothing.

193  
194  
195  
196  
197

**AFFIDAVIT OF QUINCY WAGSTAFF, PhD**

1	<b>UNITED STATES DEPARTMENT OF JUSTICE</b>
2	<b>EXECUTIVE OFFICE FOR IMMIGRATION REVIEW</b>
3	<b>IMMIGRATION COURT</b>
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7	)
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9	<b>A23 571 113</b> ) <b>Presiding Judge</b>
10	)
11	<b>In removal proceedings</b> )
12	
13	<b>AFFIDAVIT OF QUINCY WAGSTAFF, PhD</b>
14	
15	My name is Quincy Wagstaff, PhD - people generally refer to me as
16	Professor Wagstaff or Dr. Wagstaff (or, on occasion to mes amis les plus proches,
17	simply Q). After all the years of higher education I have very successfully
18	completed, I most certainly believe I should receive some credit for this fait
19	accompli. The following is a summary of my Curriculum Vitae: High School
20	Salutatorian; College triple major in Economics, Political Science, and
21	International Relations, triple minor in Musicology, philosophy and French, bien
22	sur. What can I say? I like things in threes. Graduated Summa Cum Laude.
23	Received Masters in International Studies. Doctoral thesis titled “Freedonia: A
24	Castigating Examination of the Fallacious Documentary Which Relegated the
25	Knave and Spree Parties Back to the Dark Ages.” Received a Doctorate in
26	International Science. I am a tenured Professor of International Studies at Superior

27 International University and have been employed in a professorial capacity there  
28 for 15 years. In addition to my extensive training in the field of my expertise,  
29 specifically the political region encompassing Mundistan, Freedonia, and  
30 Sylvania, I have also been called on by numerous governmental agencies and  
31 businesses to consult with respect to assessing the past and current political and  
32 business climates in certain regions of the world. Due to the increasing number of  
33 imports and exports between the United States and Freedonia, my savoir-faire of  
34 the Freedonian system has proven even more valuable. Officials from both the  
35 United States and Freedonia have contacted me, seeking my learned counsel on  
36 the political climate and business opportunities in Freedonia, and I have aptly  
37 provided sage, workable guidance concerning those matters. As you can see from  
38 my impressive C.V., to use the vernacular, "I know my stuff." If you must have  
39 some personal (and frankly none of your business) information about my private  
40 life, I am in my 4th marriage, have 3 purebred Shih Tzus, and perform with the  
41 Golden Circle orchestra on viola. My life is most satisfying.

42 I have thoroughly reviewed Respondent's application and supporting  
43 documents, and find his/her/their arguments in favor of asylum to be less than  
44 satisfactory. Respondent's predicament is, I am sure, most unsatisfying to  
45 Respondent; however, that is the situation within which s/he/they has placed  
46 him/her/themself. Should Respondent have stayed in school and not abandoned  
47 his/her/their education by ignorantly choosing to "drop out" of college, I am nearly  
48 positive that things would have turned out differently for Respondent. Alas, that is  
49 not to be, as Respondent has not (again vernacular) "dotted the i's and crossed the  
50 t's." Respondent is a prime example of why standards are so necessary. Standards  
51 exist to limit the number of aliens allowed to remain in our fine United States of  
52 America, and those who cannot follow the letter of the law with respect to  
53 Immigration ought not be allowed to remain. My informed and educated  
54 professional opinion, as an expert in my field, is that Respondent should say "a  
55 bientot" to the United States and immediately be deported to Freedonia as soon as

56 possible, so that Respondent can seamlessly transition back into the normal routine  
57 of life to which s/he/they was accustomed before coming here on his/her/their  
58 temporary visa. Respondent should be able, considering the current economic  
59 situation in Freedonia, to find the same menial “proletarian type” position  
60 Respondent has always held. His/her/their own conclusions are “a tort et a  
61 travers.” Respondent has absolutely no reason to assume that merely because  
62 s/he/they was “promised” a government job upon his/her/their return to Freedonia  
63 and now, with the rise of the Knave Party that will likely not occur, that somehow  
64 Respondent is somehow entitled to remain, pouting so to speak, in the United  
65 States. Now that the Knave Party is in the majority and is in control, ousting  
66 disgruntled Spree Party members from government positions or  
67 “De-Spreeification” is in no way illegal, and it just makes good business sense to  
68 have a fluid job market. In order to ensure that employees are loyal, hardworking  
69 and able to provide the services that society requires and demands (because they  
70 have a right to see their tax dollars at work), government employees must expect a  
71 change, albeit loss of jobs, when the party shifts. C’est la vie. The quaint saying  
72 “beggars can’t be choosers” aptly applies to Respondent’s situation. Again, jobs in  
73 Freedonia are available in the non-governmental sector, and upon his/her/their  
74 return Respondent should be able to provide him/her/their self with food, housing,  
75 and the other essentials of life. If not, then Respondent is simply shiftless and,  
76 enfin, lazy.

77 I am sans doute to a reasonable degree of scientific certainty that  
78 Respondent will be perfectly safe upon his/her/their return to Freedonia. After my  
79 extensive research on the political and socio-economic condition of Freedonia, it  
80 appears to me that the current political situation will resolve itself peacefully  
81 eventually. In all my thorough study and exegesis of the current condition in  
82 Freedonia, I predict and anticipate within a reasonable probability that Respondent  
83 will be as safe in Freedonia as an infant in its mother's care. Respondent has, in my  
84 opinion, no well founded fear of persecution, based on the facts of his/her

85 particular case. I do not believe that Respondent will be in danger. Never. Not  
86 ever. Never.

87 Unless, of course, the political situation changes drastically, or my research  
88 is somehow incorrect, which I highly doubt. Some say one can never predict the  
89 future, but I beg to differ. I believe I can. That is my job. That is what I get paid  
90 handsomely for. An unbiased and wholly neutral task force was set up to analyze  
91 the risk factor in Freedonia for former sympathizers of the Spree Party, and in a  
92 500-page report the conclusion was that the risk was minimal. You need only refer  
93 to Exhibit #8 to agree my testimony is true and accurate. Maybe take bits and  
94 pieces out of State Report, make conclusions about human rights violations which  
95 I disagree with, etc.). Such studies and reports are often relied upon by experts  
96 such as myself in the field, and I found this report to be exceptionally accurate. I  
97 have also reviewed State Department reports, including Exhibit #6, CIA  
98 documents, and other records prepared by both governments. These documents are  
99 the type which are reasonably relied upon by experts in International Studies like  
100 myself. Since the Knave Party took over, officials of the Freedonian government  
101 have contacted me to specifically consult regarding human rights reforms, and I  
102 have provided them with advice. Reports also indicate that my sage words have  
103 been heeded and fully and successfully implemented. The new and validly elected  
104 government is not acting in a suspicious or secretive manner and should be trusted.  
105 The Knaves indicate they want transparency in government, and their actions have  
106 spoken volumes. Just look at YouTube videos and Facebook sites to confirm what  
107 I am saying. If violations of rights were taking place under the new Knave control,  
108 do you not think that you would see and hear about it?

109 In my review of Respondent's application and supporting documents, it  
110 appears that Respondent says s/he/they is afraid of being tortured if returned to  
111 Freedonia. If Respondent is worried about torture, I can say that in my visits to  
112 Freedonia, I have never ever observed any evidence of methods of torture being  
113 utilized. Nor have I personally heard any stories about people being actively

114 tortured for their contrary political views. I, myself, have visited Freedonia at least  
115 ten times during the rule of the Spree Party, and I was allowed to tour the jails and  
116 prisons of Freedonia. In those facilities, no instruments of torture were observed.  
117 During my visits there, some at the invitation of the Spree Party and others at the  
118 request of various corporations, I can personally say that I was never subjected to  
119 torture even though my fame as an expert of the Spree and Knave parties was, I  
120 am confident, well known. (Unless you count the time I ate at that perfectly awful  
121 restaurant, ordered the “famous” duck soup, and nearly died from what I self  
122 diagnosed as food poisoning). What I have read in government reports and  
123 documents suggests that any "stories" about torture are simply that - stories. No  
124 reasonable person would ever torture someone for the acts which Respondent  
125 claims to have participated in. In addition, although I have not physically visited  
126 Freedonia since the Knaves won the election in November, 2018, I have  
127 personally reviewed investigative reports prepared by the newly elected law  
128 enforcement officials and spoken via teleconference with knowledgeable  
129 government officials, and it is obvious that when complaints by citizens of either  
130 political party have been made, those matters have been fully and fairly  
131 investigated. If crimes are reported and the perpetrator is not located, the police are  
132 not to blame, as it is readily apparent law enforcement agencies made significant  
133 efforts to solve the crimes.

134           Although some of the records I reviewed allege the possibility of  
135 widespread persecution focused on former Spree members, it appears that most of  
136 those reports were determined to be unfounded. The accusations which could be  
137 even marginally substantiated were instigated by vigilante groups and were not at  
138 the behest of the new government. In fact, under the current government, such  
139 vigilante groups have been disbanded and dispersed. Merely because certain  
140 Knave and Spree Party members verbally disagree, that is to be expected, and in  
141 fact encouraged in a free society. Harmless harassment, that’s all. They are all  
142 allowed to speak their minds, with, of course, proof of proper public

143	demonstration permits subject to approval from the appropriate authorities. Now,
144	if that isn't freedom of speech, what is?
145	Both Knave and Spree parties are, however, suffering under delusions with
146	respect to their constant petty arguments about "believers" and "non-believers."
147	Their persistent irrationality about "practicing their religion and living in peace" is
148	just a lot of drivel. It is evident that both the Spree and Knave followers are
149	closed-minded segregationists, who choose to not get along. As a logical-minded,
150	clear-thinking atheist, I agree that "religion is an opium of the masses", and the
151	Spree and Knaves of Freedonia are overdosing. Perhaps Freedonia can someday
152	become more like our great country when its people kick their drug habit. That is
153	my unbiased opinion. As an expert, of course.
154	

**AFFIDAVIT OF JULES LEONARD**

1	<b>UNITED STATES DEPARTMENT OF JUSTICE</b>
2	<b>EXECUTIVE OFFICE FOR IMMIGRATION REVIEW</b>
3	<b>IMMIGRATION COURT</b>
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10	)
11	<b>In removal proceedings</b> )
12	
13	<b>AFFIDAVIT OF JULES LEONARD</b>
14	
15	My name is Jules Leonard. I have worked as an examiner for the U.S.
16	Citizenship and Immigration Service Center (USCIS) in Superior, Michigan for
17	the past 37 years. I have assisted thousands of immigrants in securing a new life in
18	the United States. America remains the land of the free and a beacon of
19	opportunity for peoples around the globe. I find my career very rewarding, but it is
20	also filled with great responsibility. I am fully aware that the decisions that I make
21	when doing an investigation and interview literally change lives.
22	I remember Watergate and those political scandals, and the spirit of hope
23	and renewal of democracy that followed. I also vividly remember how
24	Michigianians stepped forward to welcome refugees from Southeast Asia in the
25	aftermath of the Vietnam War. I grew up thinking that I wanted to make a
26	difference in public service. In college I majored in Political Science and I

27 considered going to graduate school in public administration, but my student loans  
28 needed paying, so I took a job straight away in civil service – first with the Post  
29 Office, then with the IRS, and finally with USCIS.

30 I don't make decisions in a vacuum. And I don't let any personal biases get  
31 in the way of my assessment of each situation. The reality is that there are many  
32 more people who want to stay in the United States than we have space for. That is  
33 not my decision – that is the policy of the government. There is a misconception  
34 that each examiner has a kind of God complex – where we each make decisions  
35 that inflate our own importance. That is not the case with me, nor with any of the  
36 other examiners that I know. We follow strict guidelines and protocols and apply  
37 the criteria set by others to each individual circumstance.

38 In recent years, there have been an increased number of applicants from  
39 Freedonia. I have read extensively about the social, economic, religious and  
40 political climate in that part of the world. Still, I never let any preconceptions or  
41 any previous dealings with applicants influence my assessment of each new case. I  
42 still take time to do the research and to carefully read applications and prepare for  
43 interviews. The present situation involving Quin Zion is a typical example.

44 Let me step you through the process. First of all, each examiner undergoes  
45 extensive training. There is also a requirement for continuing education each year.  
46 Our training consists of both content updates – focusing on new developments  
47 around the world to prepare us for what is expected; and skills development –  
48 practicing our interview and investigation techniques to make sure that we are as  
49 prepared as possible. In a typical Center, each investigator has a working caseload  
50 of between a dozen to 20 open applications per week. Obviously some  
51 applications may require more work than others and some situations are much  
52 more complex than others. But we are trained to go through the same process with  
53 each applicant before we come to a decision.

54 Our office is referred cases from ICE of those seeking asylum in the United  
55 States. Each applicant must fill out a form I-589, Application for Asylum and for

56 Withholding of Removal. This form collects basic biographical information and  
57 offers and opportunity for applicants to explain their situations and to provide  
58 supporting documentation. This form is the basis for the background check that we  
59 do on each applicant prior to the interview and also prepares us to ask the right  
60 questions to dig deeper into the situation. We then contact each applicant and set  
61 up a time for an in-person non-adversarial interview. We do allow the asylum  
62 seeker to bring an attorney or legal representative and we do provide translation  
63 services if requested.

64           The primary component to the investigation is the interview process. These  
65 interviews typically run longer than an hour and involve both confirmation of  
66 biographical information provided on the forms and an opportunity for the  
67 applicant to tell more about his or her specific situation. Basically, in order to gain  
68 asylum in the United States, there must be evidence of past persecution or a  
69 well-founded fear of persecution based on race, religion, nationality, political  
70 opinion or membership in a particular social group. Prior to the interview, as I  
71 have said, I do an extensive investigation of the situation, relying on country and  
72 regional condition reports prepared by the US Department of State, the CIA, and  
73 by well-known non-governmental organizations, such as Amnesty International  
74 and Human Rights Watch. These resources give me the necessary background  
75 information – setting the context for each interview.

76           As I said before, the determination that I make in each circumstance is not  
77 a “gut decision” but is instead based on established criteria and policy. So, for  
78 example, when I refer to “persecution” I mean specifically (and I’m quoting the  
79 USCIS policy here) that there must be presented hard evidence that there is a  
80 threat to life or freedom, or the infliction of suffering or harm upon those who  
81 differ in a way regarded as offensive. By fear of future persecution, I mean that the  
82 individual possesses a belief or characteristic that a persecutor seeks to overcome  
83 by means of punishment of some sort; the persecutor is already aware, or could  
84 become aware, that the alien possesses the belief or characteristic; the persecutor

85 has the capability of punishing the alien; and the persecutor has the inclination to  
86 punish the alien.

87 In the case at hand regarding Quin Zion, I went through the process as  
88 described. I received the Form I-589 and an interview was set. I do recall that the  
89 first scheduled interview was cancelled at the very last minute. We usually require  
90 formal notice in writing for rescheduling, but Quin apparently gave our scheduler  
91 a good enough sob story that the interview was rescheduled. Since the interview is  
92 a formal process involving the administration of an oath and taking of fingerprints  
93 and establishing background biographical information, the schedule is very tight.  
94 We expect applicants to arrive early – or at the very least on time, for their  
95 appointments. Mr./Ms/M. Zion kept us waiting – on a rescheduled interview – for  
96 more than 5 minutes. In many situations, the application would have been  
97 immediately denied due to failure to abide by the procedures. However, once  
98 again, we gave Quin the benefit of the doubt and continued with the interview.

99 As you can see from the submitted Form I-589, the information submitted  
100 by Quin Zion was sketchy at best. I tried to dig deeper through my questions and  
101 did get a little more background. Throughout the interview, however, the applicant  
102 did not seem overly emotional, upset or distraught by the prospect of being  
103 returned to her/his homeland. I don't know if Mr./Ms. Zion may have assumed  
104 that since other Freedomian applicants had been granted asylum the applicant was  
105 that s/he had been allowed to attend college here and got a taste of the good life. If  
106 s/he had stayed in college, we would not even be having this interview – and this  
107 hearing. Since s/he failed to maintain her/his full-time student status, s/he had to  
108 come up with a different reason to stay in the U.S. In my judgment, her/his “fear  
109 of persecution” is merely a pretext for staying in America. In the application and  
110 in the interview, s/he didn't have any personal verification from conditions in  
111 Freedomia after the election or any well-founded basis for any personal harm. S/he  
112 was here on a student visa, but I never saw any grade report. It didn't appear that  
113 s/he was taking school very seriously. S/he claims to need asylum for her/his own

114 safety, but there may actually be evidence that s/he her/himself was involved in  
115 persecution of others before s/he left Freedonia. Her/his family continues to live in  
116 safety in Freedonia. I simply found no credible basis for granting her/his asylum  
117 claim.

118           My interview technique is about as non-intimidating as a person can get – I  
119 think that’s one of the reasons I’m so good at my job. I am usually able to put  
120 asylum seekers at ease and convey a sense that I genuinely want to hear their  
121 stories and want to help them if I can. I treat everyone with the utmost respect. I do  
122 not judge a person based on their life circumstances. I allow ample time for each  
123 applicant to tell their story. (And believe me, in my many years at this position, I  
124 have heard some stories! I have heard accounts from applicants that really make  
125 me wonder about humanity - the depths of depravity that some will go to in order  
126 to cause harm to others simply because they are different in some way is  
127 astounding and appalling.) I try my best to put aside any personal baggage that I  
128 may have at the time – if I have stress in my life or am not feeling well or simply  
129 having a bad day, I try to take that into consideration in making a final assessment.  
130 I give each applicant the benefit of the doubt.

131           At the end of the day, there are many more applicants for asylum than there  
132 are spaces available. Each year, there are many more than 50,000 claims. For the  
133 last 5 years or so, the United States has been the main receiving country for  
134 asylum applications. While most of these asylum seekers come from China (more  
135 than a third of all applicants), there are a growing number from all areas of the  
136 world.

137           Once I had completed my interview of Quin Zion and conducted additional  
138 research on the current political and religious situation in Freedonia, I determined  
139 that s/he/they was ineligible for asylum in the United States. Once that finding was  
140 entered, the case file was forwarded to the Immigration court where the asylum  
141 claim can be evaluated anew. That’s where we are today in the process.

142

143	I feel no ill will or animosity toward Quin Zion. Based on the information
144	presented to me in the interview, on the application form and by credible and
145	reliable research sources, I do not believe that there is a real threat in returning the
146	applicant to her/his native country. I am familiar with the political change in
147	government that occurred after the election in 2018 and that there was sporadic
148	violence in the change in power and certainly some individuals were targeted – I
149	have granted asylum to other Freedonians based on their evidence presented - but
150	a change in government in and of itself is not sufficient to show fear of
151	persecution. My research sources suggest that the political situation between the
152	Knaves and the Spree has moderated to a great extent. There is also evidence that
153	many NGOs that removed workers from Freedonia immediately after the election
154	(and the election violence) are now returning to that country.
155	

# EXHIBITS

# EXHIBIT 1: I-589 APPLICATION FOR ASYLUM

Department of Homeland Security  
U.S. Citizenship and Immigration Services  
U.S. Department of Justice  
Executive Office for Immigration Review

OMB No. 1615-0067; Expires 09/30/2022

## 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) 2357113		2. U.S. Social Security Number (if any)	
3. USCIS Online Account Number (if any)			
4. Complete Last Name Zion		5. First Name Quin	6. Middle Name
7. What other names have you used (include maiden name and aliases)?			
8. Residence in the U.S. (where you physically reside)			
Street Number and Name 628 Perfect Number Lane		Apt. Number	
City Superior	State Michigan	Zip Code 50317	Telephone Number ( 515 ) 697-7882
9. Mailing Address in the U.S. (if different than the address in Item Number 8)			
In Care Of (if applicable):		Telephone Number ( )	
Street Number and Name		Apt. Number	
City	State	Zip Code	
10. Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	11. Marital Status: <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed		
12. Date of Birth (mm/dd/yyyy) 02/22/2001	13. City and Country of Birth John, Freedomia		
14. Present Nationality (Citizenship) Freedomian	15. Nationality at Birth Freedomian	16. Race, Ethnic, or Tribal Group Spree	17. Religion Spree
18. 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.			
19. Complete 19 a through c. a. When did you last leave your country? (mmm/dd/yyyy) <u>6/18/2018</u> b. What is your current I-94 Number, if any? <u>G-31374147</u> 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 <u>7/26/2018</u> Place <u>New York City</u> Status <u>F-1</u> Date Status Expires _____ Date _____ Place _____ Status _____ Date _____ Place _____ Status _____			
20. What country issued your last passport or travel document? Freedomia	21. Passport Number <u>1123581321</u>		22. Expiration Date (mm/dd/yyyy) <u>06/28/28</u>
	Travel Document Number		
23. What is your native language (include dialect, if applicable)?	24. Are you fluent in English? <input type="checkbox"/> Yes <input type="checkbox"/> No	25. What other languages do you speak fluently?	
For EOIR use only.	For USCIS use only.	Action: Interview Date: _____ Asylum Officer ID No.: _____	Decision: Approval Date: _____ Denial Date: _____ Referral Date: _____

Form I-589 (Rev. 09/10/19) N

**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) (if any)		2. Passport/ID Card Number (if any)		3. Date of Birth (mm/dd/yyyy)		4. U.S. Social Security Number (if any)	
5. Complete Last Name			6. First Name		7. Middle Name		8. Other names used (include maiden name and aliases)
9. Date of Marriage (mm/dd/yyyy)			10. Place of Marriage			11. City and Country of Birth	
12. Nationality (Citizenship)			13. Race, Ethnic, or Tribal Group			14. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	
15. Is this person in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 16 to 24.) <input type="checkbox"/> No (Specify location):							
16. Place of last entry into the U.S.		17. Date of last entry into the U.S. (mm/dd/yyyy)		18. I-94 Number (if any)		19. Status when last admitted (Visa type, if any)	
20. What is your spouse's current status?		21. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)		22. Is your spouse in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No		23. If previously in the U.S., date of previous arrival (mm/dd/yyyy)	
24. If in the U.S., is your spouse to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (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.) <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: \_\_\_\_\_

(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) (if any)		2. Passport/ID Card Number (if any)		3. Marital Status (Married, Single, Divorced, Widowed)		4. U.S. Social Security Number (if any)	
5. Complete Last Name			6. First Name		7. Middle Name		8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth			10. Nationality (Citizenship)			11. Race, Ethnic, or Tribal Group	
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):				
14. Place of last entry into the U.S.		15. Date of last entry into the U.S. (mm/dd/yyyy)		16. I-94 Number (if any)		17. Status when last admitted (Visa type, if any)	
18. What is your child's current status?		19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)		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							

Part A.II. Information About Your Spouse and Children (Continued)			
1. Alien Registration Number (A-Number) (if any)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	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): _____			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (if any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	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 spouse 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)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	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): _____			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (if any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	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 spouse 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)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	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): _____			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (if any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	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 spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

**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)
3455 Fibbernocci Drive	Trentino		Freedonia	03/2009	06/2018

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)
628 Perfect Number Lane	Superior	Michigan	USA	07/2018	present
3455 Fibbernocci Drive	Trentino		Freedonia	03/2009	07/2018

3. Provide the following information about your education, beginning with the most recent school that you attended.  
(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)
Superior International	Univeristy	Superior, MI, USA	08/2018	03/2020
Oprah Xram High School PS#14	High School	Trentino, Freedonia	08/2016	06/2018

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)
Oprah Xram Bowling Alley and Funplex, Trentino	Pinsetter	09/2016	05/2018
Parents	Farm and Livestock worker	03/2009	08/2016

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	
		<input type="checkbox"/> Deceased	Current Location
Mother Mo Bique	John, Freedonia	<input type="checkbox"/> Deceased	Trentino, Freedonia
Father Sam Bique-Zion	New Chris City, Freedonia	<input type="checkbox"/> Deceased	Trention, Freedonia
Sibling Jamsi Zion	John, Freedonia	<input type="checkbox"/> Deceased	John, Freedonia
Sibling Dewys Zion	John, Freedonia	<input type="checkbox"/> Deceased	UKNOWN
Sibling Bretja Zion	John, Freedonia	<input type="checkbox"/> Deceased	UKNOWN
Sibling		<input type="checkbox"/> Deceased	

## 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 I: 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:

- |  |   |
|--|---|
| <input type="checkbox"/> Race                | <input checked="" type="checkbox"/> Political opinion                       |
| <input checked="" type="checkbox"/> Religion | <input checked="" type="checkbox"/> Membership in a particular social group |
| <input type="checkbox"/> Nationality         | <input type="checkbox"/> 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.

After the Knaves stole the government of Freedonia in an election in November 2019 from the true believers, the Spree (a religion and political party to which my entire family belongs), the Knaves began to attack members of the Spree and to fail to protect us from bands of bandana wearing Knaves who threatened my family. The new government took part of my parents' business based on my parents' religious affiliation. The knave government has issued a warrant for my arrest to try to force me back in Freedonia just to expose me to violence by the vigilante Knaves. Some of the harm is directly caused by the Knave usurpers in power and some is being done by thugs. I believe they are trying to punish us true believers based on our religious beliefs. I also believe they are persecuting me because I supported the Spree faith and political party.

- 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.

My family has already lost some of our business because of the arbitrary way the Knaves are enforcing the tax code and otherwise oppressing Spree businesses. In addition, there are gangs of vigilantes roaming around Freedonia attacking and threatening Spree members who worked for the government. I believe that there is a gang of thugs actively looking for me because they came to my parents house with cricket bats and asked for me. They were mean and threatening to my parents.

**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 (including for an immigration law violation)?

No  Yes

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

I have been informed that there is a warrant for my arrest from the Knave government for questioning. I have done nothing wrong, just provided information about traitors to my country before I came to the United States to go to school.

- 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.

d  
My entire family are members of the Spree faith and political party. I joined on my sixteenth birthday. Almost immediately after that I was invited, along with almost everyone at school, to join the Watchout Club. We kept an eye open for traitors and troublemakers who were undermining the legitimate government of Freedonia. I made reports of what I saw and heard. I joined a group to become better informed about their seditious conduct. I never held any official rank or title for the Watchout Club, although I know I did a good job for them. They told me so. I was involved with the Club for around a year. My parents belong to Spree but I never held any position of authority at all.

- 3.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.

My parents are afraid to participate in open Spree activities. I would, but am here now.

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 am afraid that the Knave gangs roaming around Trentino will find me and beat me with cricket bats. I am afraid that the Knave petty government officials will take more of my economic future by closing my parents' business. I have no confidence that the police will protect me from such attacks. In fact, I believe that the government is feeding information to the gangs about my situation. Other Spree have simply disappeared without a trace.

**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

- 2.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.

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.

**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).)

Are you crazy? I want to go back to visit my parents but it is not safe. I am amazed that they have not been more brutally beaten. So far it has just been threats to try to force my parents to inform the thugs and gangs and government where I am. Hopefully, my parents will be safe. I have not gone back and cannot go back.

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 1: 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 (including for an immigration law violation)?

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.

Not even a speeding ticket.

**Part D. Your Signature**

I certify, under penalty of perjury under the laws of the United States of America, that this application and the evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(a), provides in part: Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact in any application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, or knowingly presents any such application, affidavit, or other document containing any such false statement or which fails to contain any reasonable basis in law or fact - shall be fined in accordance with this title or imprisoned for up to 25 years. I authorize the release of any information from my immigration record that U.S. Citizenship and Immigration Services (USCIS) needs to determine eligibility for the benefit I am seeking.

Staple your photograph here or the photograph of the family member to be included on the extra copy of the application submitted for that person.

**WARNING:** Applicants who are in the United States unlawfully 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.

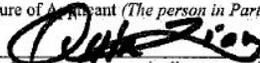
Print your complete name. <b>Quin Zion</b>	Write your name in your native alphabet.
---	--

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?  No  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?  No  Yes

Signature of Applicant (The person in Part A.I.)  
  
 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. Number	City	State	Zip Code
To be completed by an attorney or accredited representative (if any).	<input type="checkbox"/> Select this box if Form G-28 is attached.	Attorney State Bar Number (if applicable)	Attorney or Accredited Representative USCIS Online Account Number (if any)

**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

Supplement A, Form I-589

A-Number (If available)	Date
Applicant's Name	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)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	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): _____			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (If any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	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)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	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): _____			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (If any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	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			

## Supplement B, Form I-589

### Additional Information About Your Claim to Asylum

A-Number (if available)	Date
Applicant's Name	Applicant's Signature

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

Part \_\_\_\_\_

Question \_\_\_\_\_

Form I-589 Supplement B (Rev. 09/10/19) N

## EXHIBIT 2: LETTER FROM FAMILY TO RESPONDENT (2 JANUARY 2019)

2 января, 2019

Дорогой quin,

Пишу тебе в печали. Мошенники украли выборы и заявляют что Ваксин Рот, один из Мошенников, получил больше голосов чем наш любимый лидер, Опра Храм. Немедленно после этой пародии, Мошенники начали дико бегать по улицам. На них были банданы и они искали членов Спри чтоб напасть на них. Твой отец и я едва спаслись, найдя убежище в церкви.

Перед Праздникус, один из Мошенников, утверждая что он контролер по продуктам, отменил наши лицензии на импорт, так что мы не смогли ввести наши кипарисовые деревья. Без деревьев мы не можем заваривать чай. У нас остался только наш молочный бизнес. Мы не можем справиться без помощи. Местные государственные агентства и школы отменили наши контракты поставлять им молоко и чай. Возможно нам придется продать нашу ферму. Меня и твоего отца тоже беспокоят. Нам сказали что мы задолжали налоги. Нам повезло что мы сохранили немного денег и смогли сразу же заплатить задолженность. Тот член Мошенников удивился и разозлился что мы смогли спасти нашу ферму. Тот, так называемый, служащий, сказал что мы можем возобновить наш бизнес как только мы обратимся в правду. Также, несколько банд Мошенников скитались по сельской местности и били членов Спри когда те были на улице. Я была шокирована. Сначала, я звонила в полицию каждый раз когда я это видела. Обычно полиция мешкала добраться до места происшествия, а к тому времени как они приезжали, преступники успевали давно скрыться. Однажды, полицейский что взял вызов спросил была ли я членом Спри. Он отметил это в своем отчете. После этого на мои звонки все дольше и дольше не отвечали. Полиция также сообщила что они никогда не могли найти никого из нападающих. Я всегда давала точное описание бандан которые были на нападающих, но

полиция утверждала что они не в силах ничего сделать.

Полицейский сказал что у них есть ордер на твой арест. Он сказал они хотят поговорить с тобой о твоём предательстве. Я сказала им что ты ходишь в школу в Америке и получаешь национальную стипендию на основе твоих заслуг. Он сказал что он ещё об этом позаботится. У нас нет денег содержать тебя в школе если твоя стипендия пропадет.

Извини что обескуражила тебя, но ситуация здесь может ухудшиться. Ну, на самом деле, шайка подростков, с банданами на голове, приходила к нам домой 28 декабря и спрашивали не хотел бы ты поиграть с ними в футбол. Я знала что они не хотели играть с тобой в футбол потому что у некоторых были крикетные биты. Главарь шайки спросил когда ты будешь дома, так как они собирались вернуться повидать тебя. Когда я сказала что ты не вернешься, он стал грубить и оскорблять меня. Он сказал что он надеется у нас имеется много стекла, так как нам может понадобится заменить несколько окон в доме. Затем он сказал что он надеется у меня есть пачка денег чтоб заплатить за окна. Я была очень напугана. Пожалуйста попытайся остаться в Америке, по крайней мере пока здесь не станет безопасно. Может через некоторое время правительство устанет от этих хулиганов и прекратит их насилие. Тебе здесь опасно находиться. Я не уверена, безопасно ли нам с твоим отцом быть здесь. Нам просто некуда идти.

С любовью и утиным супом.  
Мама.

## Exhibit 2 – Continued

2 January 2019

Dearest Quin,

I am writing to you with a heavy heart. The Knaves have stolen the election and claim that Waxing Roth, a Knave got more votes than our beloved leader, Oprah Xram. Immediately after this travesty, the Knaves began to run wild in the streets. They were wearing bandanas and looking for Spree members to assault. Your father and I only barely escaped by claiming sanctuary in the church.

Before the Festivus, a Knave, claiming to be an official food inspector, revoked our import license so we could not bring in Cypress trees. Without the trees, we could not brew tea. We are left with our milking business alone. Without help we cannot manage. Our contracts to supply milk and tea to some local government agencies and to the schools have been cancelled. We may have to sell the farm. Your father and I have been harassed too. We were told we were behind in our taxes. It was just luck that we had stashed a small sum and we were able to pay the arrearages on the spot. That Knave was surprised and angry that we saved our farm. That ‘official’ said we could resume our business as soon as we converted to the truth.

Also several gangs of Knaves have been roaming around the countryside beating Spree when they find them out and about. It is shocking. At first, I called the police whenever I saw this happening. The police would take their own sweet time coming to the scene, but by the time they arrived, the malefactors would be long gone. Once, the police officer that responded asked if I was Spree. He noted that in the report. After that my calls took longer and longer to get a response. The police also reported that they could never find any of the attackers. I always gave a careful description of the bandanas the attackers wore but the police claimed to be helpless to do anything.

The police told me that there is a warrant for your arrest. He said they want to talk to you about being a traitor. I told him you were going to school in America on a national merit scholarship. He said we will see about that. We do not have money to support you in school if the scholarship disappears.

Sorry to be so discouraged, but things here could not be any worse. Well, actually, a gang of teenagers or young adults, wearing bandanas, came by the house on December 28th to ask if you were around to play soccer. I knew they did not want you to play soccer because some of them had cricket bats.

The spokesperson asked when you would be home as they planned to come back to see you. When I told them that you were not coming back, he became very rude and verbally abusive to me. He said he hoped I had plenty of glass since some of my windows might need to be replaced. Then he said he hoped I had a stash of cash to pay for the windows too. That was truly scary.

Please find a way to stay in America, at least until things become safe. Maybe after a while the government will tire of these hoodlums and put a stop to their violence. You are not safe here. I am not certain that Father and I are safe. We just have nowhere else to go.

With love and Duck Soup,  
Mom

### CERTIFICATION OF TRANSLATION

I, Anna Mundy, certify that I am competent to translate the foregoing document from Freedomian into English, and that the translation is true and accurate to the best of my abilities.

Signed,

---

Anna Mundy

## EXHIBIT 3: LETTER FROM FAMILY TO RESPONDENT (15 SEPTEMBER 2019)

15 Сентября, 2019

Дорогой Quin,

Я так о тебе беспокоюсь. Некоторое время я думала что ситуация здесь постепенно улучшалась. Полиция по прежнему ничего не делала чтоб отбить охоту шаек избивать членов Спри, и полиция ничего не делала чтоб исследовать насилия против нас. Однако, казалось что подросткам и молодым людям надоело делать эти насилия, и они решили перейти к другим видам создания проблем. Например, они нападали на наши церкви и бизнесы, вместо того чтоб гоняться за людьми. Это было два месяца назад. Затем нападки на членов Спри резко увеличились. Полиция вернулась к своей политике «ничего не вижу, ничего не слышу, ничего не делаю.»

А вчера, группа молодых людей в банданах, подошла к нашему дому и спросила как ты еще можешь быть в Америке если государственных денег чтоб тебя там содержать нет. Я спросила откуда они это знают. Их главарь только ухмыльнулся и сказал передать тебе что они все еще ждут с нетерпением поиграть с тобой в футбол когда ты вернешься. Он не грубил так, как в прошлый раз после Праздникус, но он казался более злым и хладнокровным.

Твой отец и я продолжаем работать на ферме и надеяться. Мы молимся и надеемся что в нашу страну вернется здравый смысл. Никакое правительство не идеально, но Фредония не может и не защитит тебя. На самом деле, я подозреваю что правительство финансирует эти нападки и дает информацию этим шайкам. Береги себя и держись отсюда подальше. У меня разрывается сердце тебе это писать. Может ты сможешь договориться чтоб и мы переехали в Америку. Любовь и Утиный суп,  
Мама.

### Exhibit 3 - Continued

15 September 2019

Dear Quin,

I am so worried about you. For a while I believed that the situation here was gradually improving.

The police still do nothing to discourage the gangs from bothering Spree and they do nothing to investigate violence against us. However, it seemed that the teenagers and young adults who were doing the vigilante stuff were getting bored with it and were moving on to other kinds of trouble making. For example, they have been attacking our churches and businesses rather than chasing individuals. That is until the last two months. There has been a sudden upsurge in attacks against individual Spree by these gangs. The police have returned to their policy of see nothing, hear nothing, do nothing.

And then yesterday, a group of young adults, wearing bandanas came to the house asking how you can still be in America when there is no government money to support you. I asked how they can possibly know that. Their leader just smiled and said to tell you they are looking forward to a game of soccer when you return. He was not as rude as he was after the Festivus, but he was much meaner and colder.

Father and I continue to work the farm and to hope. We pray and hope that common sense will return to our country. No government is perfect, but Freedonia cannot or will not protect you. In fact, I suspect they are fueling these attacks and providing information to these gangs. Be safe and stay away. It breaks my heart to write these words. Perhaps you could arrange for us to come to America too.

Love and Duck Soup,  
Mom

#### CERTIFICATION OF TRANSLATION

I, Anna Mundy, certify that I am competent to translate the foregoing document from Freedonian into English, and that the translation is true and accurate to the best of my abilities.

Signed,

---

Anna Mundy

## **EXHIBIT 4: LETTER FROM FREEDONIA GOVERNMENT TO RESPONDENT**

### **FREEDONIA**

**National Department of Education  
Division of International Studies**

27 December 2019

Dear Citizen **Quin Zion**:

In November 2018, the nation spoke about our future. In a free and fair election, we have ousted Oprah Xram and his useless old policies. Unfortunately, we inherited a monstrous national debt, incurred by the profligate ways of the prior administration. The National Department of Education has determined that there will be no further expenditure of Freedonian money to support our citizens for foreign travel or education without a further determination of the economic consequences of any such proposed program. We have learned that some enemies of the state were using this program to hide from the new government. No longer.

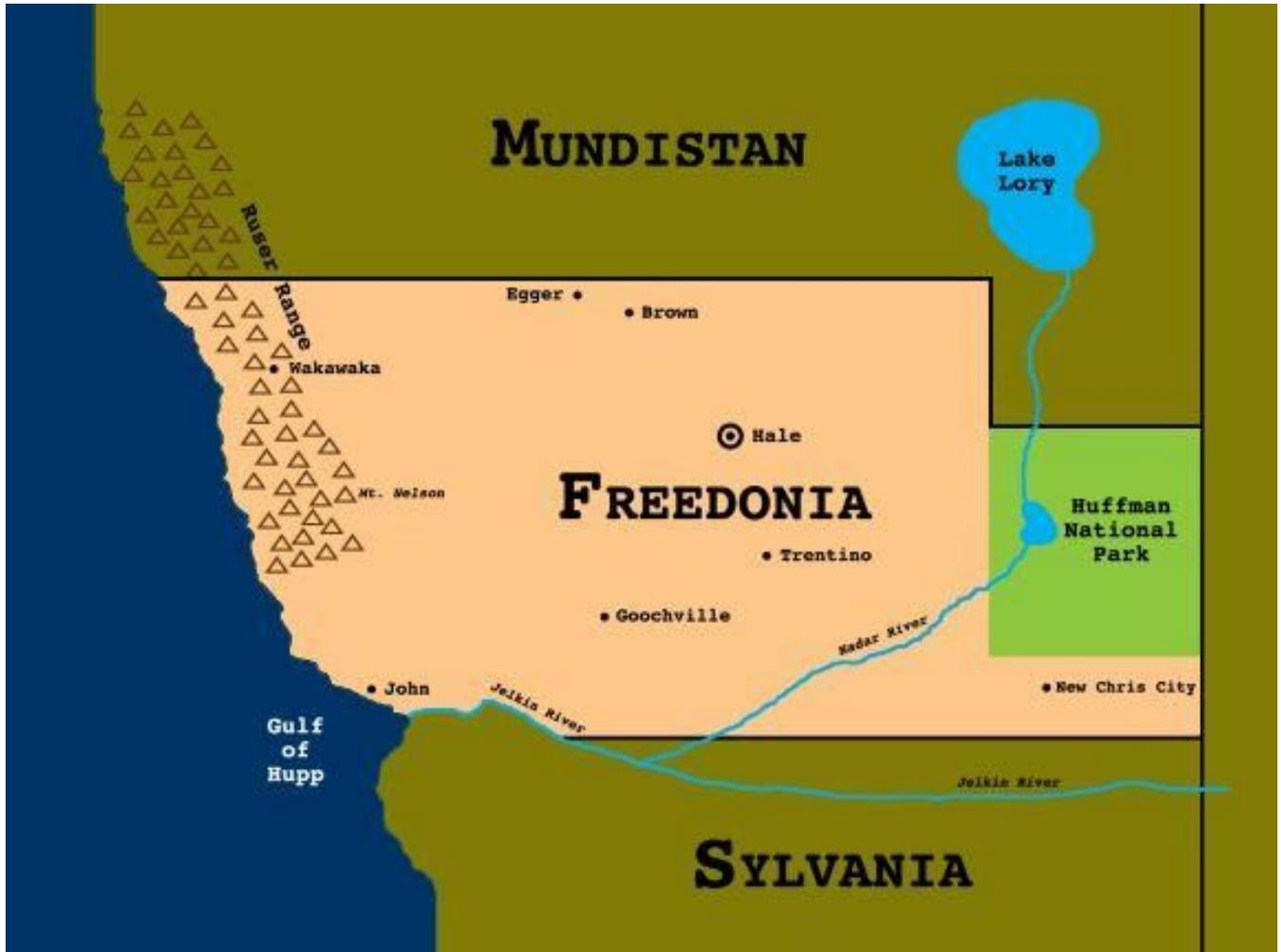
Accordingly, your scholarship, per diem, travel expenses and other moneys that were being drained from the national coffers is cancelled. You may return to Freedonia and apply for limited funds to study at a national university and the even more limited funds to seek to study abroad. Study outside our beloved country is looked on with express disfavor and only a unique confluence of patriotic content and social commitment will be considered before any more funds will become available.

If you have any questions about this important and appropriate change in national policy, just come by the office here at the government building any business day, Monday through Thursday from 10:00 a.m. until 2:30 p.m., (we are closed from 12:00- 12:45 p.m. daily) and ask to speak with our international studies coordinator.

In New Found Justice and Faith,  
/s/ Jason Glass  
Jason Glass,  
Agency Administrator

Mailed to:  
**Quin Zion**  
**628 Perfect Number Lane**  
**Superior, MI USA 50317**

## EXHIBIT 5: MAP OF FREEDONIA



## EXHIBIT 6: STATE DEPARTMENT COUNTRY REPORT

# Freedonia

February 2019

## PROFILE

### Geography

Area: 28,748 sq. km. (slightly larger than Maryland).

Major cities: *Capital*--Hale (600,000, 2015 est.). *Other*—Trentino (200,000, 2015 est.); John (97,000, 200\15 est.)

Terrain: Freedonia is predominantly flat but mountainous along its coastline.

Climate: Mild, temperate; cool, wet winters; dry, hot summers.

### People

Population (2019 est.): 2,600,523.

Official languages: Freedonian and English. Freedonian, closely related to Russian, is the natural language spoken by the natives; however, most government functions, education, and commerce are conducted in English due to the country's colonial past.

Health (2019 est.): *Life expectancy*--males 74.95 years; females 80.53 years. *Infant mortality rate*--20.02 deaths per 1,000 live births.

### Government

Freedonia is a republic. The Constitution provides for three branches of government - executive, legislative, and judicial. Suffrage: Universal at age 18. Main political parties: Knave 46%, Spree 32%, others 22%.

### Economy

Real GDP growth: 6% (2018); 6% (2019 forecast).

Inflation rate (2018): 5.4%.

Unemployment rate: 14.7%.

Natural resources: Oil, gas, coal, iron, copper and chrome ores.

### History

For the past 100 years, the Knave and the Spree parties have been the two most predominant political parties and have been consistently feuding throughout that time. Generally speaking, each

party remains in power for approximately seven years, then dissatisfaction with the ruling party occurs. Typically, anti-government demonstrations occur in a wide-spread manner and are often uncontrolled until they escalate into violence, either to persons or property. Police forces then step in, attempts to peacefully disperse the demonstrators are made, and if unsuccessful, arrests are made. Based on past cases involving both political parties, some of the more vocal demonstrators who have been arrested, have been jailed for up to 6 months.

The former President of Freedonia and Spree Party member, Oprah Xram, remained in power longer than most. He was President for three 4-year terms (there are no term limits in Freedonia) and was finally ousted in the recent election on November 11, 2018. Unlike elections in the United States, the new President takes power immediately. If the former President is unprepared for his ouster, the new President will often physically move the ousted President's belongings out of the President's mansion, not unlike a spurned lover or an angry roommate. Unfortunately, Xram found himself in that position, and the new President and Knave Party member, Waxing Roth, took great pleasure in physically and politically ousting Xram from the Mansion. Xram's supporters were less than happy, which resulted in riots in the streets, physical property damage, and some assaults directed at Knave supporters. However, on November 11, 2018, and shortly thereafter, Roth supporters were not blameless with respect to actions against Spree members. There were reports of extremist Knaves and vigilantes forcibly taking over government-run facilities, such as prisons, jails, and other detention centers, freeing the Knaves imprisoned there and attacking those in authority. Ordinary Spree citizens also reported damage to personal and business properties, and a few reported being physically assaulted on election day 2018 and shortly thereafter.

### **Entry/Exit Requirements**

A passport and visa are required for Freedonians to leave the country. Some foreign nationals are allowed to enter Freedonia with only passports, while others require entry visas. Visit the Embassy of Freedonia web site for the most current visa information.

### **Elections**

The Constitution provides for the right to vote in free and fair elections, and citizens exercised this right in 2018 in elections that international observers deemed administratively free and transparent; however, the elections were conducted in an atmosphere of intimidation, because most voters believed that vigilantes loyal to Roth would have started a civil war if he lost. Since Roth's election in 2018, former Spree government officials have complained that President Roth uses intimidation, patronage, and corruption to maintain power. Officials in the Roth government and Roth supporters deny these claims. Because the legislative elections were held on the basis of proportional representation, Roth's Knave Party won control of the legislature by the same 55 percent majority that he received in the popular vote for the presidency.

### **Freedom of Religion**

The Constitution provides for freedom of religion, and the Government generally has respected this right in practice. All organizations, including religious groups, must register with the Government; however, traditional indigenous religious groups (Knaves and Spree) were not required to register, and generally did not register.

Some tensions existed between the two major religious communities (Knaves and Spree). The private sector in urban areas, particularly in the capital, gave preference to the Knave faith in civic ceremonies and observances, and discrimination against followers of other organized religions affected areas of individual opportunity and employment. There was an interfaith council that brought together leaders of the Knave and Spree faiths in January, 2019, and tensions appear to have decreased.

## **Safety and Security**

The official policy of the current Government of Freedonia is that it takes seriously its responsibility for protecting its citizens, tourists, and diplomats. As of the end of 2018, however, that policy remained mostly aspirational. There were reports of vigilante groups representing the Knave Party, who took to the streets in the days after the November 2018 elections to exact revenge on ethnic Spree. Some vigilante activity remains, albeit more scattered and less violent than in the days immediately following the November 2018 elections. There are also narcotraffickers and other groups that oppose the strengthening of a democratic government who operate in Freedonia. Those groups aim to weaken or bring down the new Government of Freedonia, and often, to drive Westerners out of the country. In some circumstances, these groups may use violence to achieve their aims, using carjackings, kidnappings, and assaults. Perhaps the most dangerous situation in certain areas of Freedonia arises from former actions of vigilante groups when they buried land mines, which now lie unexploded.

## **Crime**

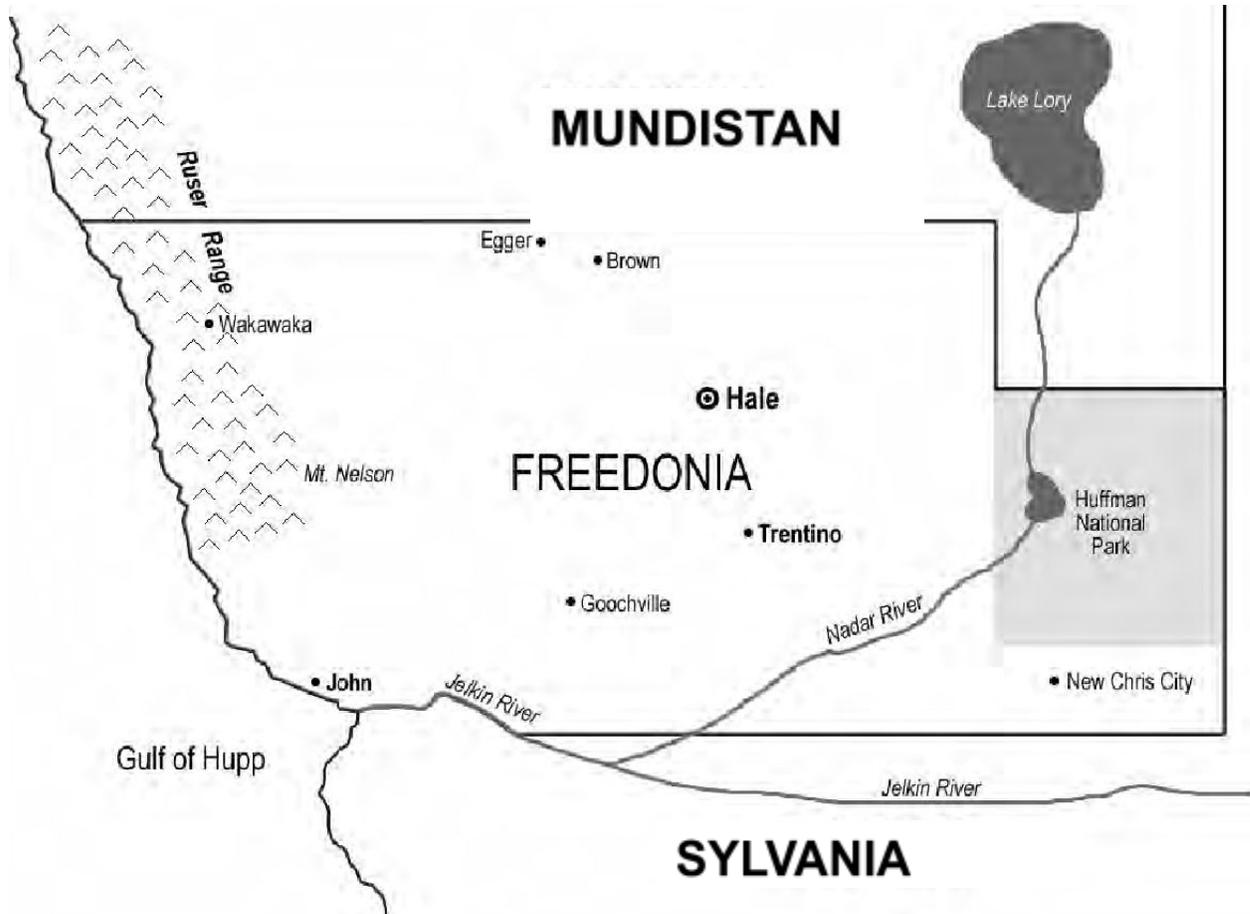
The crime rate in Freedonia is relatively low and violent crime is rare in large measure due to the strong law and order policies of the newly-elected government. However, burglary, petty theft, and robberies do occur. Laptop computers and other electronic devices are particularly subject to theft and should, if at all possible be concealed. Women are encouraged to keep their purses firmly under their arms, and men should avoid keeping their wallets in their hip pockets while in marketplaces. Freedonia has a professional police force, and citizens and visitors are encouraged to contact the police if they encounter problems. Under the former Government frustration over crime and a lack of appropriate judicial remedies has led to violent incidents of vigilantism. Mobs targeted police in the past, resulting in delayed or ineffective responses by law enforcement. Under the current Knave-run Government, vigilantism has significantly decreased, and law enforcement can effectively investigate crimes.

The long-term problem involving the ritualistic killing of ducks remains persistent. Black-market beak trades are at a ten year high. It is illegal to possess a duck beak. It is also illegal to use a cell phone and/or text while operating a motor vehicle.

## **Special Circumstances**

Beware of strong currents, riptides, and undertow along Freedonia's coast beaches. They pose a serious threat to even the strongest swimmers. Signs warning of treacherous surf are rare and confined mostly to private beaches owned by hotels. Lifeguards are rarely present on beaches.

**MAP OF FREEDONIA**



## EXHIBIT 7: EMAIL TO RANKIN BASS FROM ROBERT WATERMAN

### Rankin Bass

**From:** Robert Waterman [rwaterman@wow.org]

**Sent:** December 01, 2018 11:17 AM

**To:** Rankin Bass [rbass@wow.org]

To all volunteers in Freedonia:

We have received many reports from our volunteers and contacts in Freedonia which cite numerous incidents of violence following the recent election in Freedonia.

After careful consideration, the executive board has decided that it is not currently safe for our volunteers to remain in Freedonia. Please be advised that WOW is immediately suspending operations in Freedonia until further notice. If you are currently assigned to our Freedonian campus, please prepare for evacuation.

It is our goal to have all WOW members out of Freedonia by the end of the week. Your team leaders will be in contact with each of you with specific plans for your departure.

The executive board of WOW commends and thanks each of our volunteers in Freedonia for the hard work you have committed to our mission. We know that you have already made a difference in the lives of many Freedonian children.

It is our goal to re-establish our efforts in Freedonia as soon as the government becomes more stable.

Please direct any questions you may have to your team leader.

Sincerely,

**Robert Waterman**  
Executive Director  
WOW

## **EXHIBIT 8: ABSTRACT OF KNAVE FOUNDATION TASK FORCE REPORT**

### **ABSTRACT AUGUST 2019 TASK FORCE REPORT FOR FREEDONIA**

**Issue:** Whether former sympathizers of the Spree Party are at risk of physical and/or economic harm under the current Knave government?

**Conclusion:** The risk to Spree, if any, under the current government is minimal. Spree members should feel as safe economically and in their persons as Knaves.

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Sponsored by the Knave Foundation for Responsible Government and Freedom of Religion