



**NOTE:** This is a sample declaration, to be used by attorneys and accredited representatives assisting Afghan asylum seekers as a way to learn how to write declarations. **DO NOT copy any of the language in here.** Your client's declaration should be written in her or his own words and reflect the individual facts of her or his case. If you cut and paste language from this declaration, this will hugely undermine your client's credibility and could lead to a denial of her or his asylum application.

Additionally, this is one way to structure a client declaration, but by no means the only one. We have provided headings as a way to demonstrate that headings are a useful way to highlight important parts of your client's story and catch the Asylum Officer's attention. If you decide to use headings, you should draft headings specific to your client's case. You and your client may also decide to tell her or his story in a different chronological order, or to highlight more/no/different aspects of Afghan history.

**DECLARATION OF ABBAS MUSTAFA SARABI  
IN SUPPORT OF APPLICATION FOR ASYLUM<sup>1</sup>**

1. My name is Abbas Mustafa Sarabi. I am a native and citizen of Afghanistan. I entered the United States on September 2, 2021 as a parolee. I have not left the United States since that time. I am filing this declaration in support of my application for asylum.
2. I am applying for asylum because I am afraid that the Taliban will torture me and even kill me if I am forced to return to Afghanistan. I believe they would do this to me because of my work with a U.S. based non-profit, Human Rights Foundation, my wife's work to promote educational opportunities for girls, and the fact that I am Hazara. They have already threatened me and my wife with death multiple times, and now that they control Afghanistan I have no doubt they would carry out those threats if I had to return.

**Personal Background**

<sup>1</sup> Abbas Mustafa Sarabi does not exist. This is a fictional story based on events that have transpired in Afghanistan. The location names and general events mentioned are real, but the applicant and all personal details about him and his family are fictional. Any similarities to any real persons are entirely coincidental.

**Commented [JD1]:** We recommend beginning the declaration with a short statement summarizing the basis for the claim and expressing the client's fear of persecution.

**Commented [JD2]:** Subheadings are a great way to summarize the story and orient the reader, highlighting the essential elements of the claim.

3. I was born on December 17, 1982 in Bamyan, a town located in central Afghanistan. Like everyone in my family, I am Hazara. I speak Dari, Pashto, and English. Dari is what my family speaks and what I learned growing up. I learned English while studying at university.
4. As a child, I lived in Bamyan with my parents, and two brothers, Ahmad and Darwood. My father was a teacher and my mother looked after me and my brothers. My parents always valued education and I went through both primary and secondary school in Bamyan. Sadly, due to what felt like constant fighting and war in my town, my education was regularly disrupted as a boy.
5. During the Afghan Civil War, the Bamiyan Valley was often a heavily contested area. The beautiful, ancient caves in my town were used to store weaponry from the warring factions. This was a scary time as a child, as I frequently heard guns firing. My parents always told me and my brothers to stay clear of the caves. I remember having to spend weeks at a time hiding indoors with my parents and brothers trying to avoid the violence around us. During these times, my father would try to teach me and my brothers math and reading. Because my father's school was closed during the worst of the fighting, my parents regularly struggled to make ends meet.
6. My parents never liked to discuss politics with me and my brothers when we were young. I think they were worried about us being labeled as opposing any of the various regimes that came in and out of power during my childhood. My parents just told us that they wanted us to live our lives in peace.

#### **1996: The Taliban Gains Power and Massacres Hazaras**

7. In 1996, the Taliban gained control over Afghanistan. I was in secondary school at the time. I was saddened when the girls' schools in Bamyan shut down due to the Taliban's strict rules. I remember being terrified of the Taliban. Like most other Hazara, my family and I are Shia Muslims. The Taliban, however, are Sunni Muslim and immediately began speaking out against Hazaras when they came to power. They called us infidels and threatened they would target Hazaras with violence. My family started limiting our time out of the house, leaving only to go to school or the market.
8. In August 1998, our worst fears came true when the Taliban murdered thousands of Hazara in a town called Mazara-e-Sharif. The following month, the Taliban rounded up and executed hundreds of Hazaras in Bamiyan. My family had been visiting my grandparents in the countryside on the day of the massacre, so we were spared. However,

**Commented [JD3]:** It is helpful to include a background section in the declaration that describes your client's life before the particular circumstances that gave rise to your client's asylum claim. This helps to create a fuller picture of who the client is as an individual and provides context for the rest of the story. There is no need, however, to repeat all of the biographical information included in the I-589 such as parents and siblings names, educational and work history, etc.

**Commented [JD4]:** If your client is old enough to remember the Afghan Civil War and the prior period of Taliban rule, it is a good idea to describe what the experience was like for them. If they were too young to remember themselves, it may be useful to include a paragraph about what they heard from their families and/or communities.

**Commented [JD5]:** After the background section of the declaration, it is best for your client to tell her/his story in chronological order, touching on the most salient events.

**Commented [JD6]:** You should only include historical events that the client personally remembers, not facts that you or the client have learned by doing country conditions research. Here, the fictitious client personally remembers these massacres.

three of my classmates and their fathers were killed. I was terrified that my family would be next. We continued to try to stay close to home and keep our political beliefs to ourselves.

9. I graduated from high school in August 2000 and desperately wanted to go to university. However, due to the disruptions to my father's work due to years of war, I did not have enough money to pay the tuition. Instead, I took a job working on a local farm and began to save up money.
10. In March 2001, my town made international news when the Taliban blew up the famous Bamiyan Buddha statues that had been created in the 6<sup>th</sup> Century. I remembered being very upset at the time. Even though I am Muslim, I always appreciated the beautiful statues and they were a famous attraction in our town.
11. Following the attacks on the United States on September 11, 2001, the United States invaded Afghanistan. Life came to a standstill for me and my family and we hid out at home. We were incredibly happy when the Taliban was defeated in November 2001, and hoped there would finally be peace in Afghanistan.

#### **My Work at a U.S. NGO, Human Rights Foundation**

12. By April 2003, my family had finally saved enough money for me to go to university. I enrolled at the University of Peshawar in Pakistan, where I studied journalism and English for almost two years. My studies gave me a good exposure to both local and world affairs as well as current events. While I was there, I had a student visa. I never had any more permanent status there, and after I left Pakistan my status there ended.
13. In February 2005, I missed my family and my home, and I felt that things were changing in Afghanistan, and I could imagine my future there. I left the University of Peshawar to enroll at the University of Kabul. I joined the student newspaper and found myself drawn to writing stories about marginalized people in Afghanistan.
14. While studying in Kabul, I got to know my now wife, Maryam. Maryam also grew up in Bamyan. Her father was a teacher like mine and our families saw each other at social gatherings, but did not know each other well. Being in a new city, I took comfort spending time with Maryam, who was studying history and English at the University of Kabul. We got married October 14, 2006.
15. Even though the Taliban had been defeated by the time we went to university, there were not many women at the University of Kabul. Maryam had been fortunate that her parents

valued educating girls and her father was able to provide an education to her even when the Taliban shut down girls' schools. Most girls in Afghanistan were not able to receive any education during the time of Taliban rule. Recognizing the value of women's education, Maryam and some other women at the University of Kabul formed an organization that promoted educating girls.

16. After Maryam and I graduated from university in 2008, we stayed in Kabul. Maryam got a job working as an interpreter at a local hospital and I started working as a journalist for the Afghanistan Times. For several years, I covered local news and entertainment in Kabul. In 2011, after Maryam and I had our son Ahmad, I decided that I wanted to do work that made more of an impact. I left the Afghanistan Times to work for Etilaat e Roz, another Afghan newspaper, where I became an investigative journalist. My articles focused on government corruption. Although Etilaat e Roz was a small paper, our investigations regularly created headlines and we were known for breaking big stories. In my investigations I saw over and over that ethnic minorities were being discriminated against by the Afghan government.
17. In 2015, I decided that I wanted to do more than just report on corruption and human rights abuses. I wanted to advocate for the people affected by these problems. I left my career in journalism to work for the Human Rights Foundation, a large international human rights organization. I became a researcher and traveled the country researching human rights abuses.
18. The majority of my work at Human Rights Foundation focused on the everyday experiences of people living in Taliban dominated districts. I researched how the Taliban restricted education, access to information and media, and freedom of movement by talking to people living in these regions. When non-Afghans working for the Human Rights Foundation travelled with me, I also acted as an interpreter.
19. From 2017-2019, I conducted nearly one hundred in-person interviews with Taliban officials, commanders, and fighters, as well as teachers, doctors, elders, students and other residents in Helmand, Kunduz, and Wardak provinces, areas that the Taliban controlled. My interviews became the basis for an in-depth 2019 report by Human Rights Foundation. The report showed that residents in Taliban-controlled areas lacked the ability to criticize or question the Taliban without facing serious human rights violations. Despite the Taliban's public statements about beginning to accept girls' education, very few local Taliban authorities permitted girls to attend school past puberty and some did not allow them to go to school at all. The report also highlighted the severe limits on freedom of expression and media in the area.

**Commented [JD7]:** It would be best for this fictional client's wife, Maryam, to also submit a declaration in this case since she was a witness to and recipient of threats from the Taliban. She also could have her own asylum claim based on the work she did in women's education. As the lawyer, you should look out for any discrepancies between the couple's accounts.

### **The Taliban Threatens Me and My Family Due to My Work**

20. I was very proud of my research and contributions to the 2019 Human Rights Foundation report on the Taliban. I felt like I was able to give a voice to the people I interviewed and wanted the world to know what was happening in Afghanistan. However, I quickly realized that my work had put me and my family in grave danger.
21. The report came out in late 2019. In February 2020, I received an anonymous letter at my Human Rights Foundation office in Kabul. The letter accused me of being an infidel and a traitor for working at a European led NGO. The letter specifically mentioned the 2019 report and said I was spreading lies and misinformation and demanded that I quit my job immediately. At first, I didn't think too much of the letter. Having worked as an investigative journalist, I was accustomed to some people disliking my work. However, additional letters started coming to me not only at my office, but my home as well. The letters said that I had made a serious mistake in criticizing the Taliban and that my family would pay a dear price for my actions. These first messages did not say that I would be killed for my work, but because they were so hostile and clearly from the Taliban, both Maryam and I understood them as death threats.
22. In addition to the letters, I also started getting text messages multiple times a week from unknown numbers stating things like "infidel," "traitor," and "your family will pay." Sometimes the messages said that I would be executed or beheaded if I did not stop my work. Some of the letters and text messages referred to the interviews I had conducted with Taliban officials and commanders and said I betrayed their trust and that working with non-Muslim people was against Islam. Even though no one ever signed the letters or identified themselves on the texts, I could tell from what they said and how they said it that the messages came from the Taliban, and I understood them all as threats to severely harm or kill me or my family.
23. At first I ignored them, but after a while I started to become anxious about these messages. I did not want to put Maryam and Ahmad in danger. The messages about my family were the ones that were most upsetting and worrying.
24. Beginning in July 2020, my wife also started receiving threatening text messages. Some said that she would pay for her husband's mistakes. Others said that I should quit my work if I knew what was good for my family. I knew that all of the text messages and letters were coming from the Taliban since they were directly referencing the report and the interviews I had conducted during my research. For the next several months, my wife and I each received threatening text messages almost every week. We both got new phones during that time, and at first the messages stopped, but then they started again on

**Commented [JG8]:** When discussing persecution, try to use the active voice rather than the passive voice. "The Taliban threatens me and my family" is stronger than "My family and I are threatened by the Taliban" -- the active voice helps to emphasize and highlight who the persecutor is and the actions the persecutor took

**Commented [JD9]:** If your client doesn't remember exact dates, it is fine to use month + year, or even an estimated timeframe (i.e. "sometime in early 2020"). You are much better off using an estimate than locking your client into a date they don't remember with 100 percent certainty.

**Commented [JD10]:** When your client has specific memories of what his/her persecutors said, the quotes can be helpful to include, especially if they indicate what their motives might be.

**Commented [JD11]:** If your client received anonymous threats or in-person threats from people who did not identify themselves, s/he should explain who s/he thinks the person or group was and why.

**Commented [JD12]:** If your client received threats, it is important to describe the frequency of the threats.

our new phones. We were very scared, but believed strongly in the work I had done and continued to do with the Human Rights Foundation.

**Commented [JD13]:** It can be very helpful to your client's credibility if s/he explains why s/he continued their work or political activities in the face of danger.

25. Around November 2020, I noticed that I was being followed in my car several times driving to and from work. Unmarked cars would quickly switch lanes behind me. Then, one day, my wife noticed two men she had never seen following her and Ahmad as she walked our son to school. After she dropped him off, the men confronted her. They said she was a Hazara infidel and that she had better stop me from spreading lies or else Ahmad may not be there when she came to pick him up at school one day. I did not report any of these events to the police because I didn't think they would be able to do anything, and I was worried that the Taliban would find out that I had made the reports.

**Commented [JG14]:** Again, it is best not to lock your client into definite dates if s/he is not 100% certain. Phrases like "around x date/month" can be a good way to do that.

26. Maryam was terrified. It felt like a line had been crossed when the men followed her and Ahmad to school and we were very scared for Ahmad's safety. We felt like we needed some time away to focus on my family. I spoke to my boss at work and she completely understood. In December 2020, my wife and I decided to take some time away from Kabul and went to live with our families in Bamyan. We changed our phone numbers and enrolled Ahmad in a school there temporarily. Maryam took a job working at a girls' school in Bamyan. We tried to put all the threats out of our minds.

**Commented [JD15]:** Since asylum is a fear based standard, it is very important for your client to describe what s/he was afraid of and why, even if it may seem obvious.

27. For a while, it felt like our plan had worked. The text messages stopped, we didn't notice anyone following us, and we didn't receive any letters. By February 2021 it was clear that the Taliban knew we were in Bamyan. Maryam and I started receiving threatening texts again. Maryam also received a hand-written letter at her school that said "we know where you are" and once again alluded to my work and called me an infidel and said that my end would come soon if I didn't stop my work. We tried to continue on with our lives, but regularly receiving these messages was more and more frightening.

28. Maryam's school also became upset after several more letters arrived there for her from the Taliban. They asked Maryam to stop teaching. Maryam was having a lot of trouble sleeping, and she lost weight. She worried all the time thinking that strange men were following her, and she became more and more afraid to leave our house. At the same time, I became more and more anxious and worried all the time. It started to distract me from my work. I started having nightmares about Taliban following me everywhere, and about the Taliban kidnapping Ahmad. Several times I woke Maryam up in the middle of the night yelling from a nightmare.

**Commented [JG16]:** If your client endured death threats or other forms of non-physical harm, it is important to document the psychological and/or physical harm this caused your client, as this can be central to an argument that this psychological harm constitutes persecution.

29. In May 2021 we decided to move back to Kabul. With the news that the U.S. was fully withdrawing from Afghanistan, we thought we'd be safer in Kabul since it wasn't Taliban controlled at the time. We both got new phones, and we enrolled Ahmad in a

different school and moved in with my cousin Hamed rather than returning to our own house. I started working at Human Rights Foundation again, but tried hard to take more security measures, like using different travel routes to work and changing my work hours each day to make it harder for people to know where I was. We hoped that we could both feel more like ourselves again, and feel like we could breathe freely and worry less.

**Commented [JD17]:** If your client was able to avoid physical harm by taking safety precautions, it is very important to describe those precautions in great detail.

### **August 2021: My Family and I Go into Hiding and Taliban Attack My Cousin**

30. At first being in Kabul was a relief, that feeling did not last long. In early June, I received a text message stating that they knew we were in Kabul. Meanwhile, all of my European colleagues at the Human Rights Foundation began leaving the country. I was sad to see them go as it was yet another signal to me that Taliban control was imminent. Maryam and I prayed for our country, while looking on in horror as the Taliban took control of greater and greater portions of Afghanistan. My nightmares started again, and Maryam was on edge all the time and not sleeping much again.
31. In July, the Human Rights Foundation shut down our Kabul office. While this was upsetting, I understood the decision. Our work was becoming increasingly dangerous and my colleagues were also receiving threats from the Taliban. Rather than researching in the field, I started reporting to Human Rights Foundation about what I was seeing each day right in Kabul. Terribly, there was an increasing trend of gunmen targeting female students, journalists, and Hazaras. Making matters worse, the Afghan government was doing very little to investigate these atrocities, even in government-controlled areas like Kabul. Afghanistan was becoming less and less safe each day.
32. In early August 2021, my next-door neighbor, also a Hazara who had worked with an international NGO, was murdered while coming home from the market. We think it was Taliban who murdered him. Maryam and I decided that we needed to go into hiding immediately. We started moving around every couple of days, staying with different friends and relatives. We stayed indoors all day. I was constantly in touch with the Human Rights Foundation, trying to figure a way to get us out of the country.
33. In mid-August, 2021, several heavily armed Taliban members showed up at my cousin Hamed's house (where we were living before we went into hiding.) They asked him where I was. When Hamed said that he did not know, they began to beat him with the butt of their guns. In between strikes, they would ask him over and over where I was. When he couldn't answer them, they went through the house turning over furniture, throwing around papers, and breaking glassware and lamps. They broke a large glass bowl on Hamed's head. Before leaving, the men told Hamed to deliver the message to me that my time would be coming soon. I think they meant that they would kill me.

**Commented [JD18]:** It is important to explain why at a certain point an asylum seeker decided to leave their country and why.

### **Our Escape from Afghanistan**

34. I was devastated when I learned what happened to my cousin. I felt very guilty that Hamed had suffered so much on my account. Two days later, on August 15, 2021, Kabul fell to Taliban control. I learned from my colleagues at Human Rights Foundation, that America was evacuating Afghans at risk from the airport, so Maryam, Ahmad and I made our way to the Kabul Airport on August 25, 2021. We did not have any of the threat letters with us – we had destroyed them all before we left because we were afraid of what might happen if the Taliban found any of them on us. The scene at the airport was chaotic and dangerous. After days of camping out next to the airport in crowded and unsanitary conditions, we were finally permitted to board a plane. We landed first in Qatar, then in Germany, and then finally we were able to fly to the United States.
35. We finally arrived at Dulles Airport on September 2, 2021. On the one hand, I felt an enormous sense of relief when the plane landed. After years of fearing the Taliban, I felt like Maryam, Ahmad, and I were finally free from them. At the same time, I still felt an enormous sense of fear for all of my friends, former colleagues, and family members back home.

### **The Taliban Continue to Look for Me**

36. After arriving in the United States, Maryam, Ahmad, and I spent two months at the Fort Pickett military base in Blackstone, Virginia before settling in Richmond, VA. Ahmad is now enrolled in school and is learning English. Maryam and I hope to obtain jobs working in the human rights field or education once we receive our work permits.
37. While we are looking forward to our new life in the U.S., our thoughts are still with our friends and families back in Afghanistan. In December 2021, I learned that my former supervisor at Human Rights Foundation was murdered by the Taliban. She had been living in hiding since the Taliban seized control over Kabul in August. The Taliban found her at her parents' house in the country and executed her.
38. Around the same time that I learned about my former supervisor's murder, I also learned that Taliban operatives had been to my parents' house in Bamyan. They asked my father where I was. When he said he didn't know, they demanded that he find out and said they would be back. They told my father that if he didn't have answers for them when they returned, my father would be killed. Living with the knowledge that I have put my father's life in danger fills me with pain every day. I fear for his safety and life.

**Commented [JD19]:** It is helpful to include information about what has happened to your client's friends, family, and colleagues since your client has arrived in the U.S. If anyone has been harmed or threatened, the declaration should include those details. Please also note if the persecutor is still looking for your client.



39. Maryam, Ahmad, and I can not return to Afghanistan. If we did, I believe that the Taliban would immediately arrest, detain, torture, and kill me and Maryam due to the work I performed for the Human Rights Foundation, Maryam's former work in girls' education, and the fact that we are Hazara. I fear they would kill my son too because of his association with us and the fact that he is Hazara. The fact that American evacuated us from Afghanistan makes things even more dangerous for us. The Taliban undoubtedly views us as political enemies because I have worked for international organizations and American helped us escape.

40. I respectfully request that you grant me and my family asylum.

\_\_\_\_\_  
Abbas Mustafa Sarabi

Date:

**Commented [JD20]:** It is a good practice to include a statement at the end of the declaration explaining why the asylum seeker is afraid to return home.