**REVISED AFFIDAVIT IN SUPPORT OF WITHHOLDING OF REMOVAL AND PROTECTION UNDER THE CONVENTION AGAINST TORTURE (CAT)**

I, Dmitry Roitman, residing at 150 West End Avenue, Apt #6D, Brooklyn, NY 11235, United States, hereby declare under penalty of perjury under the laws of the United States:

1. **Early Life and Medical Discrimination** I was born on July 1, 1973, in the Moldavian SSR, part of the former Soviet Union. From infancy, I experienced severe epileptic seizures which impaired my development and ability to learn. In the USSR, epilepsy was widely misunderstood and treated as a mental illness. I was institutionalized and stigmatized, deprived of access to proper education or developmental support. The state classified me as mentally disabled, further compounding the isolation and denial of basic rights.
2. **Civil Conflict and Forced Migration** After the collapse of the Soviet Union, violent conflict erupted in Moldova in 1992. As a Russian speaker, I was targeted and physically attacked on two occasions in Chisinau. Amidst this unrest, my mother and an acquaintance associated with the Jewish Agency, Nelly Spivak, pressured me to emigrate to Israel through a youth repatriation program. I was 19, suffering from a disabling neurological disorder, and had neither the legal nor mental capacity to make such a decision. No medical assessments, consent procedures, or guardianship reviews were conducted. I was coerced into leaving my country and placed in a foreign state without any accommodations for my disability or safeguards for my future.
3. **Arrival in Israel: Medical Neglect and Labor Exploitation** Upon arrival, I was placed at Kibbutz Degania Aleph and forced to perform strenuous labor in agriculture and factories despite experiencing active seizures. I received no neurological assessment, care plan, or medication. The worsening of my epilepsy and the physical stress contributed to repeated seizure episodes, including falls and injuries. The authorities failed to provide any protection or medical intervention, effectively treating me as expendable.
4. **Abuse and Targeting at Absorption Center** I was then relocated to the Tiberias Absorption Center. There, I was subject to verbal harassment, physical abuse, and social ostracism. I attempted to report these incidents to the local police, but my poor Hebrew and Russian accent led them to ignore my complaints. Instead, I was falsely accused of a misdemeanor I did not commit. I believe this was a result of ethnic profiling and discrimination against Russian speakers. Rather than protect me, the state’s institutions punished me for seeking help.
5. **Medical Collapse and Life-Threatening Seizures** Years of abuse and medical neglect culminated in 2000 when I suffered Status Epilepticus, a prolonged seizure that led to clinical death and being on the verge of staying alive for multiple hours. Despite my critical condition, I was denied epilepsy surgery and consistent care. The refusal of medical intervention was not due to lack of resources but rather systemic discrimination, as my mother was not Jewish and I did not fit the ethnic-religious profile of the majority.
6. **Religious and Ethnic Harassment** While seeking assistance at government agencies—such as social services for medical support, job placement, and basic coverage—I was repeatedly asked deeply personal and inappropriate questions: “*Why didn*’*t you serve in the army?”*, “*Why isn*’*t your mother Jewish?”*, “*Why haven*’*t you converted to Judaism?”* These were not formal interrogations, but they reflected a broader pattern of state-sponsored bias and social exclusion. The cumulative effect of this routine mistreatment—coming from public servants in positions of authority—was degrading and dehumanizing. It contributed significantly to my trauma, triggered PTSD symptoms, and worsened my neurological condition. I was made to feel like an outsider in a country where I was supposedly a citizen.**Total Isolation** I have never had family, friends, or community in Israel. I was taken there as a vulnerable disabled youth with no social support, and I remain completely alone. I was never given a chance to integrate or survive independently. I rely entirely on the medical and psychological care I now receive in the United States. Deportation would sever that lifeline.
7. **Flight to the U.S. and Ongoing Trauma** Eventually, I fled to the United States. In 2009, I received life-saving brain surgery at NYU Langone that stopped my seizures. However, I continue to live with PTSD, flashbacks, and nightmares. The thought of being returned to Israel is terrifying and would reactivate the trauma and medical crisis that nearly killed me.
8. **Legal Basis for CAT Protection** Under the Convention Against Torture, I seek protection from removal due to the real and foreseeable risk that I would again be subject to severe mental and physical suffering with the acquiescence or participation of Israeli authorities. I was neglected, misdiagnosed, and mistreated by public institutions, and there is no reason to believe that this would not happen again. Deportation would effectively be a death sentence.

Executed on: [Insert Date]  
Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
**Dmitry Roitman**