

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE CIRCUIT COURT

BRIAN BILBRO,

Case No.

Plaintiffs,

vs.

South Carolina Department of Social Services

**PAUL SUTLIFF'S AMENDED**

Governor Nikki Randhawa Haley

**AFFIDAVIT IN SUPPORT OF MOTION**

Lutheran Services

**FOR TEMPORARY INJUNCTION OR**

World Relief Spartanburg

**TEMPORARY RESTRAINING ORDER**

Defendants.

I am PAUL SUTLIFF, of 595 Rock Beach Road, Rochester, NY 14617. I have become aware of the irreparable harm that could result from South Carolina continuing its receipt of those labeled refugees by the federal Office of Refugee Resettlement Program. In addition I have become aware of misinformation from the South Carolina Plan that will cause irreparable harm to all taxpayers in South Carolina.

I am the author of Civilization Jihad and the Myth of Moderate Islam ©2016 Tate Publishing and Stealth Jihad Phase 2: Infiltrate American Colleges ©2014. I have a BA in Religion and Philosophy from Roberts Wesleyan College and a Masters in Education from Nazareth College of Rochester. One of the honors I have received for this work is to have some of my articles posted on the Middle East Forum's Campus Watch. My latest articles are currently posted on <http://paulsutliff.blogspot.com>. Some of my research has benefitted the FBI with information they did not previously have, inhibiting their ability to connect the dots.

**WHAT CAN NOT BE KNOWN AT PRESENT: ARE BUDGET APPROPRIATIONS FOR RRP ACCURATE?**

Due to a lack of ability to provide accuracy in projections for the rest of 2016 and I need more information to compare the State Budget, County Budgets and this State Plan as well as other crucial information to make an informed opinion on this matter. This also makes relevant

that the State of South Carolina needs more information, projections and impact statements to make an informed decision regarding the budget appropriations to cover the cost of refugees. I believe there exists material facts in dispute that must be brought before a fact finder. There is just not enough information at present. It should be enough for due diligence to side on stopping the program until this can be investigated and the budget issues can be reviewed by a neutral receiver or legislative audit.

#### **WHAT CAN BE KNOWN:**

#### **IRREPARABLE HARM TO SOUTH CAROLINIANS THROUGH MISINFORMATION**

Citizens of South Carolina have been misinformed by the State of South Carolina's statement on page 7 that "its goals and objectives will comply with those specified in the Refugee Act of 1980, as amended and pertinent official issuances of the Director of the Office of Refugee Resettlement." Note that the South Carolina state plan does not define the term refugee and by implication infers that its definition comes from the Refugee Act of 1980. This is misinformation to South Carolinians in 2016. The very misapplication of the term refugee threatens to disturb the very purpose for which South Carolina has established an Office of Refugee Resettlement Program.

Misinforming the public of the definition of refugee for those selected to enter South Carolina under this definition will place residents of South Carolina in a position of irreparable harm on several levels. Persons who will be arriving with the label "Refugee" who are "Syrian" are selected not by the United States of America but by the United Nations, a governmental agency outside of the United States of America, that designates persons as refugees who have not left their country. This misinformation given to South Carolina residents will inhibit their ability to understand and prepare for those who are being granted this label. A detailed discussion on the misapplication of the term refugee to persons arriving from Syria is in Appendix A.

#### **IRREPARABLE HARM TO SOUTH CAROLINA RESIDENTS FINANCIALLY**

The South Carolina *State Plan* utilizes a shell game of delivering important information which enables them to deliver a message replete in propaganda that would otherwise inform South Carolina residents of intentional increases in the use of their tax dollars to bring persons labeled refugees into the state.

On page 7 of the *State Plan* it defines the goals and objectives of the *Plan* to "to promote refugee economic self-sufficiency at the earliest possible time." It then provides objectives clearly defining the usage of federal tax dollars:

- a. Provide cash, medical and any other emergency assistance needed by individuals eligible for Refugee Resettlement services in order for them to obtain adequate living conditions.
- b. Provide the necessary tools and opportunities for the elimination of obstacles standing in the way of refugees eligible for resettlement services while moving toward economic self-sufficiency and social self-reliance.

What is not stated in these objectives is a clear difficulty that exists currently in getting persons who receive forms of public assistance independent. Page 7 does outline the usage of federal tax dollars for:

- Refugee Cash Assistance (RCA)
- Temporary Assistance for Needy Families (TANF)
- Family Independence (FI)
- Refugee Medical Assistance (RMA)
- Refugee Social Services (RSS),

Volunteer Agencies (VolAgs) contract to provide services and are paid by the amount of refugees to whom they render services. VolAgs rush refugees to the State Welfare offices to increase the amount the agency is able to keep per refugee versus paying out to meet the needs of the refugees. This is done because the moment a refugee arrives in the state they immediately qualify to receive state tax payer financed public assistance. As refugees receive more state financial assistance and less federal assistance this is marked as progressing a refugee towards independence. This is stated on page 10 of the *State Plan*.

Public assistance almost immediately is provided to assist in the cost of housing these new residents to the state of South Carolina. It can be argued that they are cutting to the head of the line in need of assistance since when they arrive their situation is defined as destitute, since they come without previous arrangements for employment.

A further burden to South Carolina residents occurs as refugees qualify for Medicaid and the Refugee Medical Assistance (RMA). Instead of RMA picking up the majority of costs, it becomes employed to meet a bare minimum of costs when Medicaid does not cover a medical issue.



Education is compulsory in South Carolina as it is throughout the USA. This is an additional burden on taxpayers. Students from non-English speaking countries are guaranteed instruction by a Teacher of English as a Second Language (TESOL). Dependent on the amount of refugees in a school district this could require additional teachers and staff to render services. This does not even take into account whether the students are functioning on grade level or need additional Special Education services. Assessments of educational needs versus abilities in a variety of areas such as an English Comprehension before placing students in appropriate educational settings require local tax dollars. The State Plan does not address these financial expenses.

School districts generally are the venue which private agencies rely on to provide adult education in reading and in English as a second language. This also places additional costs to local level and state level.

Omission of facts further complicate things as the *State Plan* is specifically addressed to those classified as Refugees. For this reason alone it is entirely inadequate. According to the US Department of State: Refugees are admitted to the U.S. as refugees and remain in that status for 12 months. They are, however, authorized and expected to work during this time. After 12 months, they are required to adjust their status to that of Permanent Resident Alien. They can apply for citizenship after having been resident in the United States for five years.

(<http://www.state.gov/j/prm/releases/factsheets/2013/210135.htm>)

The South Carolina *State Plan* does not address who pays for those who after 12 months have had their status mandatorily adjusted to Lawful Permanent Resident (LPR). This cost is necessarily passed off to the South Carolina tax payer. After 5 years of living in the USA refugees who finish the naturalization process can become citizens with no requirement of employment made.

It is standard practice for those coordinating state programs of Refugee Resettlement to operate deceitfully by misinforming the public about the federal funds for refugees. They hold a press conference about a federal funding for refugees. They talk about a 5 year program. But at no time to do they tell the press that these funds are for 5 years' worth of refugees and they payments are only for the first 8 months of their being in the USA. This has been verified by this author through FOIAs. In many cases the misinformation is much easier because they do not even inform the public that a state plan for refugees has been written.

Not stated is that federal funds such as TANF are only available to refugees for the eight months ONLY! This means that IF a refugee and his/her family have no employment after 8 months possibly due to language barriers, South Carolina taxpayers WILL pick up the bill.

Taken separately these costs may not seem much. However if South Carolina takes in a small percentage of the 30,000 President Obama set as an objective of which 10,000 Syrian refugees are to arrive by September the financial impact on tax payers could be catastrophic. This does not even go into the South Carolina budget difficulties which clearly outline issues with not having enough revenue to meet the needs of the government. Where will these funds come from if not from a tax increase on South Carolina residents? Which thus proves irreparable financial harm to residents of South Carolina.

### **IRREPARABLE HARM FROM NON-ASSIMILATION**

South Carolina's residents have been misled to believe that a purpose of the Refugee Resettlement Program is to assist refugees in the assimilation process. The South Carolina *State Plan* is missing any statement regarding adaptation and assimilation outside of language proficiency and employability. Part of this misinformation comes from past actions of the federal and state ORRP towards assisting refugees in their attainment of assimilation into their new country.

South Carolina residents need to know that the federal Office of Refugee Resettlement Program has removed any hope of asking persons in the program to assimilate. The last recorded usage of "assimilate/assimilation" by the Office of Refugee Resettlement Program according to their search engine was in 2006. The preferred term by ORRP today is "integration. The change in terminology is vast! "Assimilate" according to Merriam-Webster means "to adopt the ways of another culture: to fully become part of a different society, country, etc." Whereas the definition of "Integrate" can mean either "to combine (two or more things) to form or create something" or "to make (a person or group) part of a larger group or organization." No expectation or burden is placed on the refugee to adapt using the term integrate, the burden is placed on those around the refugee to adapt to meet their needs.

Integration and assimilation have been objected to by Islamic clerics. Considering that President Obama is not sending South Carolina any minority religions and is sending only Syrian refugees who are Sunni Muslims these clerics' fatwas have special significance. Specifically, Fatwas (Islamic ordinance carrying an equal weight with Sharia) have been issued that order Muslims who are in non-Muslim lands (Dar al-Harb) to place their religious identity above



national or ethnic identities. Sheikh Yusuf al-Qaradawi, an Islamic jurist, the founder of the European Council for Fatwa and Research (1997), which is based in London, wrote just such a fatwa.<sup>1</sup> In this there are only two duties directed toward a Muslim's new country. The first is to call non-believers to Islam. The second is to champion the rights of Muslims.

### **How is this problematic?**

#### **Problem #1 – Culture clash through sexual misconduct and other crimes**

On the Eve of 2016 in Cologne, Germany the first occurrence of a European "Taharrush gamea"<sup>2</sup> was recorded. A "Tahrrush gamea" is a gang rape/gang molestation of non-Muslim women by Muslim men. Reports vary on the amount of women who were raped or molested. The BBC<sup>3</sup> reported at least one woman was raped and indicated the problem was not happening in Cologne alone! It was happening Hamburg and elsewhere the only commonality was the influx of Muslim Middle Eastern or North African men being the perpetrators. As of January 27<sup>th</sup> 820 crimes<sup>4</sup> were reported to have happened almost of which are charged against persons described as Middle Eastern or North African males.

The sexual molestation and rapes that occurred in Cologne are not exclusive to Germany. Islamic culture based on Sharia treats women as second class citizens. A charge of rape is generally unheard of since a woman's testimony is not considered equal to that of a man in court. In Islamic countries this means a woman may not report a rape without 2 female witnesses or she must have 1 male witness (o24.7). False allegation charges are placed against those who do not have sufficient witnesses the penalties are severe.

Wilson Chowdhry, the Chairman of the British Pakistani Christian Association (BCPA) and a known human rights activists reported<sup>5</sup> on January 20, 2016 of three Pakistani young women who were attacked in Pakistan. The women were refusing the advances of three Muslims

<sup>1</sup> *Qararat wa-Fatawa al-Majlis al-Urubbil lil-Ifta wa al-Buhuth* [Decisions and religious edicts of the European Council for Fatwa and Research] (Cairo: Dar al-Tawji' wa al-Nashr al-Islamiya, 2002), pp. 5-10.

<sup>2</sup> Charlton, Corey. "The Arabic Gang-rape 'Taharrush' Phenomenon Which Sees Women Surrounded by Groups of Men in Crowds and Sexually Assaulted... and Has Now Spread to Europe." Mail Online. January 12, 2016. Accessed February 09, 2016. <http://www.dailymail.co.uk/news/article-3395390/The-Arabic-gang-rape-Taharrush-phenomenon-sees-women-surrounded-groups-men-crowds-sexually-assaulted-spread-Europe.html>.

<sup>3</sup> McGuinness, Damien. "Germany Shocked by Cologne New Year Gang Assaults on Women - BBC News." BBC News. January 5, 2016. Accessed February 09, 2016. <http://www.bbc.com/news/world-europe-35231046>.

<sup>4</sup> Hall, Alan. "Cologne Carnival Organisers Hand out Leaflets Telling Migrants Not to Rape Women or Urinate in Public in the Wake of New Year Sex Attacks." Mail Online. January 27, 2016. Accessed February 10, 2016. <http://www.dailymail.co.uk/news/article-3418820/Cologne-carnival-organisers-hand-leaflets-telling-migrants-not-rape-women-urinate-public-wake-New-Year-sex-attacks.html>.

<sup>5</sup> Choudhry, Wilson. "Christian Girl Killed for Shrugging off Advances of Rich Muslim Boys." British Pakistani Christians Association. January 20, 2016. Accessed February 10, 2016. <http://www.britishpakistanichristians.org/blog/christian-girl-killed-for-shrugging-off-advances-of-rich-muslim-boys>.

men. They said No to sex before marriage. The response of one of their attackers was, "How dare you run away from us, Christian girls are only meant for one thing the pleasure of Muslim men." This statement is reflective of Sharia concerning dhimmis (non-Muslims) living in an Islamic governed region (09.8).

Stories of sexual assault and rape as noted previously in Islamic governments are unreportable crimes without the proper witnesses creating a culture of permissiveness. Bringing men from these cultures thus places females of various ages at risk of irreparable harm. As shown in Cologne, Germany it also places the men at risk who try to protect them.

### **Problem #2 - Bullying**

Additional issues exist within school environments where Muslims are inching their way towards 18% of the student body. Schools in Birmingham, England, there was a report of "Trojan Horse Schools" which gave cause for a national investigation in charges of prejudice for Islam and against local cultures which including segregating girls from boys and bullying. Islamic educators and administrators themselves were noted as bullying non-Muslims in the report to the House of Commons in July 2014.<sup>6</sup> This culture of bullying non-Muslims was taught by example to students.

The example of Muslim adults bullying adults who were not Muslim is reason enough to have cause for concern for the safety of Mr. Bilbro's daughter. Will she be safe if she attends a school filled with Syrian refugee children who expect others to conform to the example of sharia in their home? This is an important question because under sharia women are not expected to say no and complain because they do not have equal rights. Mr. Bilbro's daughter should not have to suffer because the coming Syrian refugees refuse to adapt to the host culture of their new home.

### **Problem #3 – Culture clash through unreasonable work demands**

In 2008, about 400 employees mostly Somalians who entered the USA as refugees walked off the job at JBS Swift Co.<sup>7</sup> in dispute against not being granted time off to prayer at sundown during Ramadan. Of those 400, 250 were suspended and 120 were able to keep their jobs when they chose to go to back to work despite attempts to force the company to comply with their demands through hundreds of Muslims refusing to come in to work. In December

<sup>6</sup> Clarke, Peter. "Report into Allegations concerning Birmingham Schools Arising from the 'Trojan Horse' Letter." United Kingdom. July 2014. Accessed May 19, 2016.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/340526/HC\\_576\\_accessible-.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/340526/HC_576_accessible-.pdf).

<sup>7</sup> Migoya, David. "Muslim Swift Workers Sacked after Walkout." - The Denver Post. September 11, 2008. Accessed February 18, 2016. [http://www.denverpost.com/ci\\_10432000](http://www.denverpost.com/ci_10432000).



2015, at the very same company<sup>8</sup> that had met many of the demands of their Muslim employees through bargaining that outlined how employees could take prayer breaks and in rooms designated for Muslim prayers when accommodation was possible, 150 Muslims were fired for walking off the job after the company refused to stop production so they could pray as a large group.

These actions were attempts to force an employer who is not Muslim to comply with Sharia. The large Somalian Muslim "refugee" population in this area gave the perpetrators the belief they can force non-Muslims to comply with their beliefs. This would cause major issues with food safety, contamination endangerment, which would also cause undue hardship on their employer. Thus the potential for irreparable damage from enclaves of Muslims in a work place who will demand compliance with Sharia could lead to lost income including the creation of violations of food safety protocols as demonstrated by the example provided.

Further examples of the cultural differences of Islamic persons who express a belief that sharia can be found in 2007<sup>9</sup> when approximately 675 Muslim cab drivers refused to transport persons with alcohol or guide dogs. The issue with Muslim cab drivers refusing services to the blind because they have a guide dog has increased since 2007 especially in large cities as is shown by recent articles on this topic this past year.<sup>10</sup>

Non-assimilation or a refusal to adapt to American culture and the insistent belief that persons in America must accept sharia and comply with it, create dangerous situations in workplaces that can lead to irreparable harm. Blind persons with guide dogs being refused by Muslim cab drivers can place the blind and others who own service dogs such as veterans in places that could cause them irreparable harm. It should be noted that this vocation is a favorite of persons entering the American work environment as refugees. It enables them a sense of being self-employed in many cases.

#### **Problem #4 – Islamic enclaves create fear in those who protect us**

Islamic enclaves from migrants/refugees who have left several counties including Syria to have a better financial situation or otherwise and have ended up in various countries in Europe have resulted in areas that the police and other emergency services fear to tread. This fear of the

<sup>8</sup> Unruh, Bob. "Terror-linked CAIR in Beef over Fired Muslims." WND. December 31, 2015. Accessed February 18, 2016. <http://www.wnd.com/2015/12/terror-linked-cair-in-beef-over-fired-muslims>.

<sup>9</sup> Pinto, Barbara. "Muslim Cab Drivers Refuse to Transport Alcohol, and Dogs." ABC News. January 26, 2007. Accessed February 18, 2016. <http://abcnews.go.com/International/Story?id=2827800>.



Islamic community has extended to not informing the general population of a series of crimes because of fear of reprisal from the Islamic communities.

Note that these enclaves were not created by a large amount of Muslims moving into an area at the same time. These communities were created by Muslims moving in one by one until an area was designated as a sharia zone. There are currently several sharia zones aka NO-GO Zones throughout Europe. These have been documented almost daily in the European media.

This addresses another missing area in the *State Plan*. What happens when refugees move and create a haven safety by living close to each other? What happens when they become the majority in an area? What happens when non-Muslims want to simply pass through? Islamic communities are growing in America partially through the social engineering of organizations of the Muslim Brotherhood in North American. As stated previously the *State Plan* does not address what is an acceptable amount of persons to be taken in in any given area of the state? In addition, the *State Plan* does not address what data the state actually has on successful refugee placements of Islamic refugees. Islamic is pointed out specifically, because that is whom President Obama personally directed to be designated as refugees for America. Not knowing this data is an additional reason for due diligence to side on stopping the program until this can be investigated.

### **IRREPARABLE HARM FROM UNSANITARY CONDITIONS**

Islamic migrants/"refugees" who have made it to Europe have been found to have been urinating and defecating in public. These actions have caused towns and other levels of government to hand out leaflets explaining that this is forbidden in European culture. In Cologne and Bonn, Germany leaflets teaching this and other elements about German culture such as accepting men and women as equals were handed out<sup>11</sup> on January 27<sup>th</sup>. Such public actions by refugees would create unsanitary conditions leading to potential bio-hazards.

### **IRREPARABLE HARM FROM TERRORIST INFILTRATION**

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<sup>10</sup> "Los Angeles Cabbies Could Lose Permits over Prejudice." Seattlepi.com. February 2, 2016. Accessed February 18, 2016. <http://www.seattlepi.com/news/us/article/Los-Angeles-cabbies-could-lose-permits-over-6801600.php>.

<sup>11</sup> Op Cit

It has been public knowledge since the Guardian<sup>12</sup> on November 17, 2015 wrote of the ease and simplicity of obtaining a fake Syrian Passport. The article further states that the European border officials have no way to authenticate Syrian passports. This statement agrees with what FBI Director, James Comey's testimony before the House Oversight Committee on October 22, 2015 in that there are no databases that can be used to verify people are who they say they are. Letting person's enter who cannot be vetted poses safety and security risks to individuals in America and places the nation's security at risk. Above all it denies the stated requirement to deny person's the title of refugee who have been persecutors.

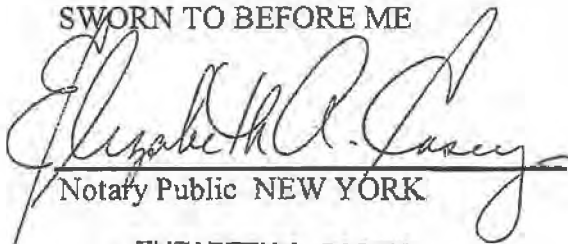
Denying that there are ISIS agents or those willing to take action as Lone Wolf Terrorists amongst those claiming to be Syrian refugees denies articles written even by Muslims themselves. One such article, written by The Muslim Issue published an article on February 2015 spoke of the threat by the Islamic State (IS) to send 500,000 jihadists amongst the migrants to Europe<sup>13</sup>.

### CONCLUSION

For the foregoing reasons, as well as those in the original papers filed by the Plaintiff, this Court should enter the temporary injunction/restraining order requested by Plaintiffs.

Rochester, NY

SWORN TO BEFORE ME

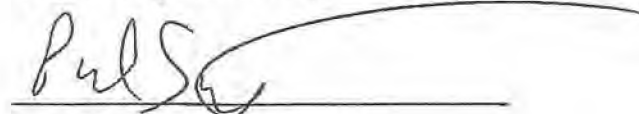


Notary Public NEW YORK

ELIZABETH A. CASEY  
Notary Public, State of New York  
No. 01CA5018275  
Qualified in Monroe County  
Commission Expires Sept. 27, 2016  
Amended Affidavit

May 20, 2016

Respectfully submitted,



Paul Sutliff

595 Rock Beach Rd., #6

Rochester, NY 14617

<sup>12</sup> Hawramy, Fazel, Phoebe Greenwood, and Patrick Kingsley. "How Easy Is It to Buy a Fake Syrian Passport?" The Guardian. November 17, 2015. Accessed February 10, 2016. <http://www.theguardian.com/world/2015/nov/17/how-easy-is-it-to-buy-fake-syrian-passport>.

<sup>13</sup> "Flashback February 2015: ISIS Threatens to Send 500,000 Migrants to Europe as a 'psychological Weapon'" The Muslim Issue. September 06, 2015. Accessed February 10, 2016. <https://themuslimissue.wordpress.com/2015/09/06/flashback-february-2015-isis-threatens-to-send-500000-migrants-to-europe-as-a-psychological-weapon>.