

Statement of Mansoor Khan
Father of Dawood Khan

There is nothing more painful in life than the death of a child. This pain is even more unbearable if your child, in despair, took his life due to actions adults took in broad daylight, over an excruciating period of months, and you could not do anything to protect your child because the perpetrators were too powerful and too ruthless. In short, my son ended his life following an inexplicable campaign of harassment by officials and staff at the high school he attended since he was seven.

My son Dawood committed suicide in November 2019, just 5 days before his 18th birthday. His death was a direct consequence of the inhumane and degrading treatment that he received at Lahore American School (LAS) in Lahore, Pakistan. He just needed a few more months at the school to graduate en route to university – but these months were denied him to cause maximum pain to him, and through him to me, the intended target, because I was disliked by the school for having demanded equality and self-respect for the locals.

What prompted the *all-out* war on Dawood in his final year by the school's senior faculty (who happened to be entirely white) was my written complaint to the American ambassador to Pakistan regarding the school's treatment of its students, which I sent after realizing that the school had no intention of mending its ways. Why did I write to the American ambassador? Under the school's constitution, the American ambassador to Pakistan is the *ex-officio* honorary chairperson of the school board and a regular director. The school receives funding from the US government; is registered with the State Department's Office of Overseas Schools; and the school even uses the address of US Department of State in Washington DC on its letterhead to prove its close association with the US government. The school is accredited by the Middle States Association of Colleges and Schools based in Philadelphia.

The school had started in the 1950s with the support of the US government "as a lighthouse school of excellence" founded on "American principles of education". The constituent documents of the school assure the students and parents that "all children have a right to safety, love, and learning" and that the school had a belief in "equality of all".

I was naive enough to have trusted the school's appealing but meaningless cliches. I sent my complaint to the American ambassador to inform him about the culture of bullying of students and parents at LAS and the institutionalized racism against locals. I also mentioned that those who dared to raise their voices were met with dire consequences. Sadly, the US ambassador refused to take any action, while my letter apparently turned the senior all-white faculty into my son Dawood's enemy.

As one of the most expensive schools in a low-income country, the school placed a very high premium on retention of students, as not many families could afford its exorbitant fees. The school collected in advance the full fee for the entire year before the start of each academic year. As a result, the best time to take revenge against a troublesome father was in a child's senior year, after the school had extracted the final payment from the student and the student was completely at the mercy of the school for appropriate class assignments and college recommendations.

Dawood saw it clearly, smart boy that he was. In a letter to a potential attorney for our case, he wrote, "My parents would constantly have meetings with LAS. I only attended one such meeting. It was clear then even to me that those discussions consisted only of sophistry that barely disguised outright hostility."

Dawood had an IQ of above 160, scored 1470 on the SAT I, which he took at the age of 15, attended summer school for the gifted at Yale, and summer school at Harvard where he opted for the quantum physics module. He was the Class Council President in 2016-2017, reached the nationals in the First Lego League robotics competition and was declared the best team delegate at CACMUN in Egypt.

He played violin and in his free time would play the violin at a school for children with autism. Dawood was also on the borderline of autism. His fine motor skills had not fully developed, and he had a rare eye condition called retinitis pigmentosa or RP. Persons suffering from RP may eventually lose their central or peripheral vision but they do not become blind.

As a result of my otherwise ineffectual complaint to the U.S. Ambassador, in Dawood's senior year, the senior faculty of the school, with the support and blessings of the school board, attempted to completely isolate Dawood from the rest of the school and his class fellows.

On the first day of his senior year, he was not allowed to enter the school on the pretext that he had not brought with him medical reports for medical tests which were not required, for which there was no notice, and which were not even available in Pakistan. For two days he was not allowed to enter the school, so that he missed all his introductory classes.

The school also abruptly announced that we would be forced to hire a very expensive attendant for Dawood while he was on campus. We had to agree to this condition under duress – the alternative was Dawood's expulsion from his school in his senior year. Dawood was not allowed to be 5 feet away from the attendant at any given time outside of his classroom. If Dawood was with friends anywhere on the school campus, his attendant, who was a young woman, was required to be right next to him. Not surprisingly, Dawood's friends started avoiding him as they did not want a third person amidst them even during recreation hours!

Without any basis for doing so, the school then mandated that while Dawood was on campus, he should at all times keep his hand on his attendant's shoulder.

Dawood was an avid archer, but the school, without any real need whatsoever or prior notice and without consulting his parents, decided that he could not be on the school campus unless he used a white cane - the last thing an archer would require and something which was liable to crush the independence and the freedom of a young man.

Dawood's letter explained: "On my first proper day of school, I was talking with my classmates during lunch. Our aide was eating her lunch a few yards away and I was well within her field of view. but when the principal of LAS saw this, he stated that she must be sitting next to me at all times, even as I stood in the middle of an open area filled with other teachers and students. From then on, I was essentially isolated from my classmates by such inhumane restrictions. I was also stopped at the school gate every day afterwards. The school had begun to mandate a new policy targeted at and effective for me alone, stating that I must use a white cane at all times on campus. I was also required to put my hand on the assistant's shoulder any time I was standing or moving."

Dawood was ordered to take braille lessons from the attendant we had been forced to hire, and as one would expect of an arbitrary requirement, it seemed not to matter that she was completely unfamiliar with braille. The school expected this attendant to learn braille over the internet and then teach it to Dawood and all this was to take place in Dawood's senior year in around seven months!

Dawood had scored the highest score in SAT I in his school, among other accomplishments, but the school also took away from him the choice to select the demanding subjects of his liking, in spite of the relevant teachers having approved his course selections. Dawood was forced to take subjects that he neither liked nor were valued by competitive universities. In his letter on the subject, Dawood wrote, the school's arbitrary "conditions stopped me from taking any of the classes for which I was approved, replacing them with subjects such as 'Keyboard and Composition' while leaving me short of two [courses]. Once the school year began, the administration further changed and restricted my courses."

Although Dawood was exempted from attending PE classes because of his health issues, one day school officials forced him to run on the treadmill, in the sun, in 104 Fahrenheit heat, amid intense humidity. This wasn't as arbitrary as it sounds; rather, it was intentional, deeply cynical, and cruel, for during my negotiations with the

school over a liability waiver they wanted me to sign, I had used as an example that Dawood suffered from migraines that often afflicted him after being in direct sunlight. Accordingly, as Dawood himself put it in his letter, “in my second-last day of school, the athletic coordinator did exactly that: I was told to run on a treadmill outdoors in temperatures over 105 F^o and extreme humidity while the other students swam in the pool.” He was wearing dress pants and leather high shoes. “When I reached home that day, as expected, I was assailed by a severe migraine that lasted hours.”

Dawood’s attendant vociferously opposed this exercise but was overruled. The cruel farce was only stopped after 30 brutal minutes, after Dawood had developed an intense headache and was about to faint. After this session, the attendant insisted that Dawood be allowed to take rest in an air-conditioned room but her reasonable request was denied.

The above cruel treatment being meted out to my son left me with no other choice but to institute a lawsuit in a court of Lahore where the main prayer was that Dawood should be allowed to continue his school with honor and dignity and be allowed to select the subjects of his choice. The court agreed. Dawood himself summarized the respect that the school showed to the court’s order as under:

“By then, we had received a court injunction that stated that I should be allowed to attend school unobstructed, and that my choice of classes should not be arbitrarily restricted. And so, the next day I obtained all the necessary signatures from teachers whose classes I was to attend, filled out the course change form, and asked for the course work I had missed. In the last ten minutes of my last class of the day, the vice principal took me aside to a corner of the library (outside of the view of any CC cameras) and accused me of flaunting a court order in front of teachers, when I had done nothing of the sort. She told me that I was not like other children, and that the same rules didn’t apply to me because I am ‘disabled.’ I was then given an ultimatum: either I would comply with the school’s demands, using the white cane and putting my hand on the aide’s shoulder, or I would not graduate. After ten years in LAS, I was driven out in my final year for a disease I was born with.” Dawood spent less than two weeks at his school in his senior year.

In September 2018, I brought the issues prevailing at the school directly to the attention of the then US Secretary of State Mike Pompeo. Neither Pompeo nor anyone at the State Department took any action. Were we to understand that the life of a Muslim child of color, who was not an American or European, was not of much importance to the Department of State?

During the same period, I engaged a lawyer in Philadelphia to formally file my complaint with the Middle States Association of Colleges and Schools (MSA) which had accredited LAS back in 1984. A formal complaint was sent to MSA which was supported by 19 annexures. MSA, however, refused to take any action whatsoever and held that it would let the Pakistani court decide the issues. But of course it’s incomprehensible that someone would expect a Pakistani court to decide whether a school in Pakistan has violated the MSA’s criteria for accreditation and several of its by-laws. This was MSA’s way of getting rid of a very genuine complaint. Worse, MSA shared my complaint and all of my confidential emails with the school, but it did not share with me the school’s response, not even the position taken by the school on my complaint.

The way the LAS does *business* in Pakistan is that it has on its board some of the most powerful Pakistanis and indeed the help of the US government is always at hand. LAS gets away with everything in Pakistan, including driving a vulnerable boy to his death, on account of its powerful and influential supporters. Some of the illegalities that LAS commits do get documented in the minutes of its board meetings, where local board members can be seen pompously describing their connections in Pakistan and their ability to getting things fixed!

For example, during the relevant period, the school was not registered with the government which was a mandatory requirement but the government took no action against the school and it was allowed to function illegally. Under the relevant law, all foreign teachers were required to obtain no-objection certificates from the government, but LAS never obtained these certificates and the government overlooked them – probably because

some of the foreign teachers were using fake identities in Pakistan and no objection certificates required proper background checks. The school's building plan was never approved, and the relevant authority, instead of demolishing the school as per law, decided not to interfere. The school's most flagrant violation was that of the local fire and safety standards - in case of a fire, no fire engine can enter the school premises because all the gates have been permanently blocked. All these issues may seem less important but the fact that the government was ignoring all of them indicate that powerful lobbies were supporting the school before whom even the government appeared helpless.

In my pending court litigations against the school and its staff and administration, the school is brazenly influencing the judges. Backdated orders are being passed by the judges. At least on one occasion, an acting American ambassador met with a senior judge of the Lahore High Court in her office which was highly inappropriate, to say the least, as 4 - 5 cases were pending in the Lahore High Court and its subordinate courts in which the school was a defendant and on whose board the US ambassador sat!

I am a Harvard trained very senior lawyer but I have given up all hope of getting justice from Pakistani courts where numerous cases that I filed against the school and others involved remain pending for several years. I have now decided to directly tell to the world Dawood's story while hoping that public pressure may eventually help me in getting justice for Dawood.