

# NATIONAL IMMIGRANT JUSTICE CENTER

A HEARTLAND ALLIANCE PROGRAM

December 20, 2017

## NIJC Case List

NIJC *pro bono* attorneys report that representing immigrants in need of protection is one of the most rewarding experiences of their careers. *Pro bono* attorneys fight for their clients' due process rights, help them navigate the complicated immigration system, and ensure that they are not deported to a country where they face persecution and torture.

There are currently 64 men, women, and children who need *pro bono* representation in asylum, VAWA and U Visa cases:

- [Special Immigrant Juvenile Status Predicate Order Cases](#)
- [Unaccompanied Immigrant Children's Asylum Cases](#)
- [Asylum Claims Based on Race, Ethnicity or Nationality](#)
- [Asylum Claims Based on Sexual Orientation and Gender Identity](#)
- [Asylum Claims Based on Domestic and Gender Violence](#)
- [Asylum Claims Based on Political Opinion or Opposition to Criminal Organizations](#)
- [VAWA Cases](#)
- [U Visa Cases](#)

No matter what type of case interests you, the next steps to help an NIJC client are easy:

- 1) **Watch a webinar from a past training.**
- 2) **Choose an NIJC client to represent.**
- 3) **Utilize NIJC's extensive *pro bono* resources and in-house expertise to prepare a strong case for your client.**

A detailed explanation of the various types of *pro bono* cases available for representation can be found on NIJC's [website](#). For more information about **detained** cases, please contact Jesse Johnson at (312) 660-1681 or [jejohnson@heartlandalliance.org](mailto:jejohnson@heartlandalliance.org). For more information about **LGBT** cases, please contact Veronica Portillo Heap at (312) 660-1306 or [vportilloheap@heartlandalliance.org](mailto:vportilloheap@heartlandalliance.org). For more information about all other **asylum** cases and **SIJS** cases, please contact Anna Sears at (312) 660-1307 or [ansears@heartlandalliance.org](mailto:ansears@heartlandalliance.org). For more information about NIJC's **U Visa** or **VAWA** cases, please contact Sylvia Wolak at (312) 660-1318 or [sywolak@heartlandalliance.org](mailto:sywolak@heartlandalliance.org).

## **Special Immigrant Juvenile Status (SIJS) Predicate Order Cases**

*SIJS is a form of immigration relief available to unmarried children who have suffered abuse, neglect, or abandonment by a parent or legal guardian. In order to apply for this relief, the child must first have a state court order asserting that they have suffered abuse, abandonment or neglect. In these matters, NIJC represents the child in her immigration case, and will attend all immigration court dates with the child. The pro bono attorney handles the state court matter only, representing the parent or guardian to obtain a custody or guardianship order with the special findings necessary for SIJS. NIJC will work closely with the pro bono attorney to ensure that the pleadings and orders in state court comply with the immigration requirements.*

***1. F. is a 17-year-old boy from Mexico who turns 18 in September of 2018. He speaks Spanish and lives with his older sister in DuPage County. (17-0117370)***

F.'s father passed away approximately nine years ago. Prior to his death, F.'s father was an alcoholic and physically abused F., his mother and his siblings. He failed to find and keep a job and rarely provided any support for F., who was raised primarily by his mother. In June of 2017, F. came to the United States to live with his older sister after receiving threats in Mexico. He was apprehended and detained in the custody of the Office of Refugee Resettlement, and eventually released to his sister's care in July 2017. The *pro bono* attorney will need to file a guardianship or non-parent custody case on behalf of F.'s sister, and obtain an order finding that F.'s reunification with his father is not viable due to his abuse and neglect and subsequent death, and that it is not in F.'s best interest to return to Mexico.

***2. P. is a 16-year-old boy from Honduras who turns 18 in January 2019. He speaks Spanish and lives with his older sister in Cook County. (17-0119104)***

P. lived with both his mother and father until he was seven years old and his mother passed away. P.'s father failed to provide any support for him after this time, so P. moved in with his maternal grandfather, where he was made to work in coffee fields and leave school at age eleven. At age thirteen, P. moved out of his maternal grandfather's house and started working for boarding and food on different coffee farms. While P. saw his father occasionally, his father never provided any support for him. P. came to the United States in July 2017 to be reunited with his adult sister after his family started receiving threats from gangs. He was apprehended and detained in the custody of the Office of Refugee Resettlement, and eventually released to his sister's care in July 2017. P. has not yet been placed in removal proceedings. The *pro bono* attorney will need to file a non-parent custody case on behalf of P.'s older sister, and obtain an order finding that P.'s reunification with his father is not viable due to abandonment and neglect, and that it is not in P.'s best interest to return to Honduras. This order must be obtained well before P.'s 18th birthday in January 2019.

## Asylum

### **Unaccompanied Immigrant Children**

*In recent years, thousands of children have fled horrific violence in their home countries to seek protection in the United States. Despite their ages and inability to speak English, these young asylum seekers do not have the right to appointed counsel.*

- 3. G. is a young man from El Salvador. Because he is an unaccompanied immigrant child, USCIS has initial jurisdiction over his asylum application. G. speaks Spanish and lives in a northwest suburb of Chicago. (17-0119214)***

G.'s parents came to the United States when he was very young and he was left in the care of his maternal grandmother. After the gang presence in his school increased, G.'s parents enrolled him in a private school and hired a private van to take him there each day, both of which they were able to afford because they lived and worked in the United States. In about October 2016, gang members hijacked the van and pulled G. out, but left other children in the van. They told him it was time he joined them and threatened him if he did not. Armed gang members continued to threaten him regularly for the rest of the month until one incident in which they forced G. to walk with them and said they had asked him to join too many times and he had to join now. G. fled to the United States in November 2016. After he fled, his family made a police report on his behalf to document the gang threats because they knew it would be too dangerous for G. to do so while he was still in El Salvador. Although G. was issued a Notice to Appear (NTA), the Department of Homeland Security (DHS) has not filed the NTA with the immigration court and so G. does not yet have a court date. NIJC timely filed G.'s asylum application in December 2017. His affidavit and supporting documents will be due one week prior to his interview, which will likely occur about three months in about March or April 2018. G.'s attorneys should plan to focus his claim on G.'s vulnerability as a child whose parents reside in the United States and are perceived as wealthy, as well as G.'s repeated opposition to the gang's demands.

- 4. Y. is a young woman from Guatemala. Because she is an unaccompanied immigrant child, USCIS has initial jurisdiction over her asylum application even though she is in removal proceedings. Y.'s Master Calendar hearing is on November 21, 2018. Y. speaks Spanish and lives in a northwest suburb of Chicago. (17-0120597)***

When Y. was 15 years old, her mother traveled to the United States to visit relatives. While her mother was away, Y.'s brother-in-law sexually assaulted her. Y. told her sister about the abuse, but her sister did not believe her. As a precaution, the next time Y.'s mother went to the United States, Y.'s mother sent Y. to live with her maternal grandmother in Honduras. While in Honduras, Y. was kidnapped by a man involved in drug trafficking who imprisoned her for about a month and raped her. Y. was able to escape her abuser and fled to the United States in December 2015. Y.'s one year filing deadline for asylum has passed, but because Y. is an unaccompanied immigrant child she is eligible for an exception to this deadline. Y.'s attorneys should file her skeletal asylum application as soon as possible or at least before Y. turns 18 in mid-February. Y.'s affidavits and supporting documents will be due one week prior to her

interview, which will likely occur about three months after her application has been filed.

**5. *V. is a young woman from Honduras. Because she is an unaccompanied immigrant child, USCIS has initial jurisdiction over her asylum application. V. speaks Spanish and lives in Milwaukee, WI. (17-0116133)***

V.'s mother fled Honduras in 2014 after gang members threatened and extorted her at her business. When V.'s mother reported the threats and extortion attempts to the police, gang members found out and came to V's home the same day and threatened to kill them. V's mother left the country immediately to come to the United States, leaving V. in the care of her maternal grandmother. In 2016, a member of the same gang that threatened V.'s mother started pursuing V. When V. tried to refuse his advances, the gang member told her that if she did not become his girlfriend, that he would kill her. Fearing for her safety, V. fled to the United States in March 2017 and joined her family in Wisconsin. USCIS must receive V.'s asylum application by March 10, 2018. V.'s affidavit and other supporting documents will not be due until one week prior to her interview, which will likely occur three months after her application is filed.

**6. *K. and L. are siblings from El Salvador. Because they are unaccompanied children, USCIS has initial jurisdiction over their asylum application. K. and L. speak Spanish and live in central Indiana. (17-0119846) (17-0119852)***

K.'s father came to the United States to work when she was two years old. K.'s father subsequently got a new family and abandoned K. and her mother. L.'s father is in El Salvador and has not provided for L. In 2012, K. and L.'s mother came to the United States leaving K. and L. with a maternal aunt. Shortly after her mother left to the United States, K. began receiving unwanted attention from Mara 18 members. K. refused to be a gang girlfriend and soon began receiving both in-person and written threats towards her and her entire family. For this reason, K. fled to the United States with her brother L. in May 2013. Although K. and L. were issued a Notice to Appear (NTA), the Department of Homeland Security (DHS) has not filed the NTA with the immigration court. K. and L.'s one year filing deadline has passed and K. and L.'s pro bono attorneys will have to argue that K. and L. warrant an exception to the one year filing deadline on the basis that K. and L. entered as unaccompanied immigrant children. NIJC recommends that a skeletal asylum application be filed by March 2018, or as soon as possible. K. and L.'s affidavits and supporting documents will not be due until one week prior to their interview, which will likely occur about three months after their application has been filed.

**7. *G. and J. are brothers from El Salvador. Their Master Calendar hearing is on May 25, 2018. G. and J. speak Spanish, and live in northern Illinois. (15-0101816)(15-0101817)***

In El Salvador, G. and J. lived with their mother (a teacher), their father (a police officer), and their sisters. In 2009, two members of the Mara Salvatrucha (MS) gang murdered their older sister and the family believes she was killed because of their father's status as a police officer and because their father had reported the men to the police in the past. The police issued arrest warrants for the two gang members, who lived next door to G. and J.'s family, but the police did not capture them. Because of their sister's murder, their parents required G. and J. to spend most of their childhood confined to their home. Several years later, G. and J.'s mother received a

letter from one of the gang members who killed their sister, demanding that she withdraw her police report and accusation against him or the gang would target their remaining children. Fearing for their children's lives, their parents sent G. and J. to the United States on tourist visas to stay with their uncle for protection. Upon entering the United States, however, immigration officials revoked their visas, determined them to be unaccompanied immigrant children, and transferred them to the custody of the Office of Refugee Resettlement (ORR). G. and J. initially applied for asylum with the asylum office, but the asylum office declined to grant their applications, and referred their cases to the immigration court. At their next hearing, their attorneys will need to request a merits hearing and prepare supporting documentation to be filed prior to the merits hearing.

### **Asylum Claims Based on Race, Ethnicity or Nationality**

**8. *Z. is a man from Somalia. His next Master Calendar Hearing is on May 31, 2018, but his attorney can request that it be rescheduled for a merits hearing. Z speaks Somali and lives in Chicago, IL. (17-0116103)***

Z. is a member of a minority ethnic group in Somalia. When he was a teenager, members of a majority clan attacked Z. and caused significant injury, including problems with his vision in his eye. Majority clan members often threatened and verbally abused Z. at his job. In June 2015, Z.'s uncle was in a traffic accident with majority clan members. The majority clan members killed Z.'s uncle and then beat his mother and sister as they searched for Z., the only male of his immediately family. Z. fled Somalia and arrived in the United States in January 2016 and was detained by immigration officials. He filed a timely, pro se asylum application before his release on bond. His attorneys will need to supplement the application with an affidavit, brief, and other supporting documents prior to his merits hearing, which has not yet been scheduled.

### **Asylum Claims Based on Sexual Orientation and Gender Identity**

*In most cases involving asylum based on sexual orientation or gender identity, NIJC has a significant amount of country conditions research already available. Pro bono attorneys will need to update and supplement this material, but the greater portion of time will be spent working with the client to establish and document the individual aspects of the client's claim.*

**9. *R. is a gay man from Nigeria. His wife and their two children are derivatives on his application. They speak English and live in Indianapolis, IN. (16-0109695) (17-0115954) (17-0115956) (17-0115958)***

R. grew up hiding his sexual orientation and struggled to come to terms with his attraction to men. In 2008, R. began a secret relationship with a man, O., which lasted nearly a decade. In 2010, R. married a woman, S., in order to hide his sexual orientation from his family and community. In April 2016, R. and O. were caught engaging in sexual activity by a neighbor, who cried out and gathered a mob. R. and O. escaped the area with the help of a friend. Once in safety, R. called his wife to inform her of the incident and confess that he was in a relationship with a man. Shortly after R. fled the area, S. was taken to the police and questioned about her husband's sexual activity, and she suffered a miscarriage shortly afterwards. R. fled Nigeria in

May 2016, entering the United States on a tourist visa, because he was afraid that he would be imprisoned or killed if he stayed in Nigeria any longer. In August 2016, S. along with her and R.'s two children entered the United States on tourist visas. R. and S. have decided to continue their marriage for the sake of their children. R. was recently in therapy in the U.S. with S. at local church in an attempt to change his sexual orientation, as a result, S. is expecting a third child. R. is still in the process of discovering who he is, and hopes to do so safely here in the United States. R.'s I-589 application was filed on December 1, 2016, and S. and their children were included as derivative applicants. R. and S.'s affidavits and other supporting documents will be due shortly before R.'s asylum interview, which will likely be scheduled in about two years.

***10. N. is a gay man from Serbia. He speaks English and lives in Chicago, IL. (17-0116396)***

As a young adult, N. worked with the Liberal Democratic Party (LDP) in Serbia. In 2012, he organized a panel about gay rights as a member of the LDP. During the panel a group of unknown men disrupted the event and N. was punched in the face and received medical attention. Police officers responded but no charges were filed against the assailants who had threatened to come after N. In 2014, N. was fired from a new job after only 6 months due to his sexual orientation. Shortly afterwards, he fled to the United States on a tourist visa, due to fear of violence for being open about his sexual orientation. After arriving in the U.S., N. applied and was granted a student visa which expires in June 2017. NIJC timely filed N's skeletal I-589 application in the summer of 2017. N.'s affidavit and supporting materials will be due prior to his asylum interview, which will likely be scheduled in about two years.

***11. D. is a gay man from Macedonia. He speaks Macedonian and limited English and lives in Chicago, IL. (17-0114892)***

When D. was 14 years old, his father caught him kissing a male friend. D.s' father called the boys derogatory terms, beat D., and forbid him from seeing his friend ever again. D. secretly continued his relationship with his friend and other students learned of it. D. was then beaten so badly at school that he passed out and woke up at the hospital. When D. was a young adult, he was having sex with a man at a park at night when they were discovered by police officers, who recorded their information from their identification documents. On another occasion, D. was beat up by strangers, called a "faggot" and thrown out of a night club where he was with several female friends. D. fled to the United States in May 2016 and NIJC timely filed his skeletal I-589 application prior to the one-year deadline. His affidavit and supporting materials will be due prior to this asylum interview, which will likely be scheduled in about two years.

***12. A. is a gay man from Palestine. He speaks Arabic and limited English. He lives in a northwestern suburb of Chicago, IL. (17-0117735)***

A. realized that he was gay as a young teenager. His peers at school often called him derogatory terms while making fun of his feminine mannerisms. As a teenager, A. became very depressed and attempted to commit suicide several times due to this mistreatment. In April 2016, A. came to the United States on a visitor visa to spend time with extended family; once they suspected that he is gay, he was kicked out of their home and forced to return to Palestine. Once back, he experienced heightened harassment and was fired from several jobs due to his sexual orientation.

At one point, a passerby threw a glass soda bottle at him because they inferred A.'s sexual orientation based on his clothing. A. returned to the United States in June 2017 on a visitor visa because he fears violence should his sexual orientation become more widely known. NIJC timely filed his skeletal I-589 asylum application in August 2017. His affidavit and supporting materials will be due two weeks prior to his asylum interview, which will likely be scheduled in about two years.

***13. A. is a lesbian woman from Kyrgyzstan. She speaks English, Kyrgyz, Russian and Turkish. She lives in Chicago, IL. (17-0117735)***

From a young age, A. was mistreated by her father as well as by peers at school because she did not present herself as traditionally feminine. At age 17, she visited the United States for an academic year through the Future Leaders Exchange (FLEX) Program; while here, she was in her first relationship with another young woman. After she returned to Kyrgyzstan at age 18, A.'s father learned of her sexual orientation and beat her. He also forced her to work with a conversion therapist who threw her into freezing water. After this incident, her father denied her medical care. A. saved money at various jobs until she was able to return to the United States on a J-1 Visa in May 2017. She fears further violence from her family or from other people in Kyrgyzstan, due to widespread anti-gay violence. NIJC timely filed her skeletal I-589 asylum application in September 2017. Her affidavit and supporting materials will be due two weeks prior to her asylum interview, which will likely be scheduled in about two years.

***14. F. is a genderqueer individual from Mexico. She speaks Spanish and lives in a northern suburb of Chicago, IL. Her next master calendar hearing is on January 4, 2018 at 10:00 a.m. (17-0119477)***

F. was assigned male at birth but, at different times, presents her gender in different ways, occasionally going by a feminine name, V. As a teenager, F. was bullied in her community due to her gender presentation. On several occasions, police officers extorted F. after seeing her holding hands with male partners. In 2016, F. was raped by two men on her way back from work because F. was perceived as gay by her attackers. Later that year, F. was recruited to work for a cartel, but she refused and was threatened that she would be forced to work with them. Fearing for her life, F. fled to the United States where she presented herself at the southern border to seek asylum in December 2016. F. was taken into ICE custody and detained for several months before being released on bond to the Chicago suburbs. She has submitted her I-589 asylum application, but pro bono counsel will need to supplement her materials prior to her merits hearing, which has not yet been scheduled.

***15. M. is a gay man from Pakistan. He speaks English and lives in northeastern IL. (17-0117906)***

M. knew from a young age that he is gay but he repressed his sexual orientation while living in Pakistan out of fear. In 2015, he came to the United States on a J-1 visa for an exchange graduate level program in the Midwest where, for the first time, he began a relationship with a man. He then returned to Pakistan after several months to comply with the visa and complete his doctoral program. However, once back in Pakistan, M. became very fearful that people would learn of his

sexual orientation and he felt that he could no longer hide who he is. In June 2017, M. returned to the United States to attend an academic conference and reunite with his partner. NIJC filed his I-589 asylum application in October 2017. His affidavit and supporting documents will be due to the Asylum Office prior to his interview, which will likely be scheduled in about two years.

***16. J. is a gay man from Venezuela. He speaks Spanish and limited English. He lives in Chicago, IL. (17-0118345)***

J. always felt as though he needed to hide and repress his sexual orientation, given the pervasive societal discrimination and homophobia in Venezuela. J. was teased and bullied at school because he acted effeminate. At age 12, J. was sexually abused by an older cousin. J. began to have consensual relationships with men at age 17, but always felt as though he had to live a double life, so people would not realize he was in relationships with men. At work, J. was mistreated by his coworkers and supervisors because they believed he was gay. Ultimately, J. decided to flee Venezuela so he could live openly as a gay man. He arrived in the United States on a B1/B2 Visa in February 2017 and NIJC filed his I-589 asylum application in October 2017. His affidavit and supporting documents will be due to the Asylum Office prior to his interview, which will likely be scheduled in approximately two years.

***17. C. is a gay man from Nigeria. He speaks English and lives in Chicago, IL. (17-0119620)***

C. knew that he is gay from a young age. While at university, he began to date men but did so secretly. Around the same time, C., and his then-partner were attacked on the way to a bus station by a group of men who hit them with sticks. In 2014, C. and other gay men were arrested by police outside of a “gay party.” The police then called his parents and “outed” him as gay; his father has since disowned him. In 2016, C. was extorted by a man he met on a gay dating app. That man and several others abducted C. and beat C. with bottles and sticks. Following this incident, C. decided to flee Nigeria, arriving in the United States on a tourist visa in August 2017. NIJC filed his I-589 asylum application in October 2017. His affidavit and supporting documents will be due to the Asylum Office prior to his interview, which will likely be scheduled in approximately two years.

***18. L. is a transgender woman from India. She speaks English, Malayalam and Tamil. She lives in Chicago, IL. (17-0117735)***

About 10 years ago, L. began her transition while in her early 30s. In the years following, L. was verbally abused and physically attacked in public on several occasions, including being sexually assaulted by a group of men. She also was the victim of domestic violence at the hands of a male partner. L. did not seek assistance from the police regarding these crimes because she knew that they would not protect her because she transgender. In about 2011, L. obtained a multiple-entry visa to Malaysia to try to find a safe place to live, but ultimately found that conditions there were also negative for transgender women. In May 2017, L. entered the United States on a P-3 artist visa to teach cultural Indian dance classes, and to seek refuge in the United States. NIJC timely filed her skeletal I-589 application in August 2017. Her affidavit and supporting materials will be due two weeks prior to her asylum interview, which will likely be scheduled in about two years.



## **Asylum Claims Based on Domestic and Gender Violence**

*Although many adjudicators previously believed that the case law regarding domestic violence and gender violence-based asylum claims was unclear, a 2014 Board of Immigration Appeals decision established that individuals who have escaped domestic and gender violence may be eligible for asylum in the United States. NIJC has been involved in federal litigation regarding gender-based asylum claims and attorneys who handle these cases will have access to a wealth of resources that will help them prepare strong cases for their clients.*

### ***19. H. is a young woman from Chad. She speaks French and lives in Chicago. (17-0118762)***

In mid-2016, H. was on her way to university in N'Djamena when she was kidnapped in an attempted forced marriage. The man who ordered the kidnapping, L., was an older member of a powerful ethnic group who had been pursuing H. since she was approximately 14 years old. H. was forcibly taken to a home on the outskirts of the city where L. told her threatened to kill her if she ever disobeyed him. Later that night, H. learned that L. had ordered that she be circumcised in preparation for the marriage. H. escaped the house in the early hours of the morning, and fled to the home of her aunt. The next day her parents told her that L. had already been to their house looking for her and making threats about what would happen if they did not reveal H.'s location. H. remained in hiding until she obtained a visa to come to the United States. NIJC timely filed H.'s I-589 application for asylum in December 2017. Affidavits and other supporting documents will be due two weeks prior to her asylum interview, which will be scheduled in two or three years.

### ***20. S. and her husband M. are from Honduras. Both S. and M. independently qualify for asylum and will be included as derivatives on each other's application. M.'s first Master Calendar hearing is on July 12, 2018. S. and M. speak Spanish and live in Northcentral Indiana. (17-0117653) (17-0117654)***

When S. was a teenager, a man abducted her and regularly raped her for a year and a half. She became pregnant and had one child in captivity and was pregnant with her second child when she was rescued. S. reported the abduction and rapes to the police but the man escaped and later returned and abducted her two children for four months. After recovering her children, S. lived with her aging parents, who indicated S. would inherit the majority of their land. Two of S.'s brothers were furious about the expected inheritance and threatened their father; telling him to give them the land. They physically attacked their father and S. was beaten as she tried to defend him. S.'s father died from the attack and the brothers began threatening S.'s about the inheritance. Later, S. met M. They began a romantic relationship and she moved her family into his house. S. soon became pregnant. M.'s ex-partner, began to threaten S. and sent men to beat S., causing her to have a miscarriage. During this same time, M. was working in the fields when he witnessed Mara 18 gang members murder a young woman. Although he tried to flee, the gang members identified him and a few days later found him, beat him, and threatened him with a gun, telling him he would die if he ever talked. M. and S., who was pregnant again, fled Honduras to escape the Mara 18, M.'s ex-partner, and S.'s brothers. The Department of Homeland Security (DHS) has issued a Notice to Appear (NTA) to S. but DHS has not yet filed her NTA with the immigration court, so she is not in removal proceedings. Unless and until DHS

files S.'s NTA with the court, the asylum office has jurisdiction over her case. NIJC timely filed S.'s asylum application with USCIS. If S. is referred to the immigration court prior to M.'s merits hearing, then their cases can be consolidated before the court. NIJC timely filed M.'s asylum application with the immigration court.

**21. R. is a woman from Mexico. Her sons G. and L. are derivatives on her asylum application. Their next Master Calendar hearing is on January 25, 2019. She speaks Spanish and lives in Indianapolis. (17-0120433), (17-0120437), (17-0120438).**

When R. was a teenager, a man in her village began stalking her. The man, H., would follow R. around her village as she sold goods from her parent's farm, frequently attempting to physically assault her. On one occasion, R. had to take refuge in the home of a neighbor after H. followed her down a secluded path. H. yelled and tried to physically force his way into the neighbor's home in an attempt to get to R. R.'s parents and other members of the community reported H.'s behavior to the authorities, but he was never punished. One evening while R. was walking with her friends, H. appeared, told R. that if she would not be with him, he would rather see her dead, and then shot R. in the stomach. R. was taken to a hospital and H. fled the scene. During his capture, H. shot and killed a federal policeman. Although it does not appear he was ever prosecuted for the attempted murder of R., H. was jailed for 8 years for the murder of the policeman. As the date of H.'s release from prison grew closer, members of H.'s family warned R. that she should leave the community for her own safety. R. and her sons G. and L. presented themselves at the United States border in November 2016 and received humanitarian parole. NIJC timely filed R.'s I-589 asylum application. R.'s pro bono attorneys will need to prepare all affidavits and supporting materials prior to her merits hearing, which has not yet been scheduled.

**22. B. is a young woman from Honduras. Her son, F., will be a derivative on her application. Their merits hearing is on May 21, 2020. B. and F. speak Spanish and live in a northern suburb of Chicago. (17-0115101), (17-0115391).**

B. left her childhood home when she was about nine years old as a result of continued verbal and physical abuse from her stepfather. She worked sporadically for a few years before she met her partner, G. when she was about 14 years old. Soon after, she became pregnant and moved in with G. and his parents. After she moved in with him, G began to physically abuse her. After the birth of their child, G. and his parents became very controlling towards B., rarely allowing her to leave the home and never with her child. G.'s abuse of B. worsened, to the point where he would strike her face with his fists even when she was holding F. in her arms. In late 2015, the Mara 18 began extorting G. for money, and eventually killed him because of his refusal to pay. After G.'s death, B. took F. to live in a small apartment in a very poor neighborhood. The apartment was in Mara Salvatrucha (MS) territory, and MS members began appearing at B.'s home demanding money from her and ransacking the apartment when she was not there, believing that G. had left her a large sum of money after his death. Meanwhile, Mara 18 members also began sending messages to B., threatening to kill F. because he was the son of a man who had opposed them. Being targeted by two rival gangs made B. feel as though she was no longer safe in Honduras, so in 2016, she fled with F. to the United States. NIJC timely filed a skeletal asylum application for B. in May 2017. Her *pro bono* attorneys will have to prepare B.'s affidavit and other supporting documents before her merits hearing in 2020.

**23. R. is a woman from Eritrea. She speaks Tigrinya and lives in Chicago, IL. (17-0115581)**

In about 2006, R. was completing her required National Service duty when a man who was her superior in the military raped her and she became pregnant as a result. When her family learned she was pregnant, they forced her to marry her rapist. R. had FGM performed on her as a child and as a result, required significant surgery in order to be able to give birth. She had a second FGM performed on her after the birth of her first child. R.'s husband beat R. regularly. While she was pregnant with their second child, he beat R. until she required hospitalization. R.'s parents knew about the physical abuse but said she had a duty to stay with her husband. R. asked the police for help but they refused to get involved because they said it was a family problem. R. filed for divorce but as revenge, R.'s husband reported R. to the police for being a Pentecostal Christian, which is a banned religion in Eritrea. R. was arrested, imprisoned and tortured for several weeks for her involvement in the Pentecostal religion. R. was released only after promising to never practice Pentecostal Christianity again. R. fled Eritrea and arrived in the United States on November 3, 2016. She timely filed her I-589 asylum application with USCIS. Her affidavit and other supporting documentation will be due one week before her interview, which will likely be scheduled in about two-three years.

**24. S. is a woman from Swaziland. Her daughter and son will be derivatives on her application. Their merits hearing is scheduled for June 16, 2021. S. speaks English and lives in Chicago, IL. (15-0099771), (15-0099890), (15-0099891)**

S.'s husband began to abuse her in 2006, after he demanded that she live with his parents and she refused. S.'s husband and his parents insulted her, told her she had to do what they demanded because they paid a dowry for her, and her husband slapped her in the face multiple times. After this incident, S.'s husband began to abuse S. constantly and often called her a prostitute and accused her of sleeping with other men. He also sexually abused her frequently. S.'s husband also beat their daughter and said he was teaching her how to be a good wife. In 2012, S. decided to cancel her husband's access to her bank account because his reckless spending was leaving her with no money to support her family. When her husband found out what she had done, he attacked her with a machete in the street, but S. managed to escape after a passerby helped her. After this incident, S.'s husband took their children and placed them in the care of his parents. He forbid S. from having any access to them and told her he would kill her if she ever saw their kids again. S. tried filing for divorce, but the court magistrate told her that she should return to her husband and denied her request. In May 2015, S. picked her children up from school and fled with them to the United States. Their affidavits and supporting materials will need to be submitted 15 days prior to their merits hearing.

**25. U. is a woman from Mongolia. She speaks Mongolian and lives in Chicago, IL. (17-0116073)**

U. grew up in the Mongolian countryside and moved to the capital, Ulaanbaatar, to attend university in 2009. Shortly after she moved, she became romantically involved with her neighbor, E. The couple moved in together and U. soon became financially dependent upon E. About five months after the couple moved in together, E. began to abuse U. verbally and physically. He tried to control her behavior, demanded she do what he told her, and kicked and

beat her. In 2013, when U.'s brother witnessed E. punching U. in the face, he was able to get the police to come to the house and arrest E., something that U. believes was only possible because her brother was a man. U. had attempted to seek help from the police on her own in the past, but had never been able to get protection. E. was detained for a few days, but then released. In 2014, U told a coworker about the abuse and was urged to flee to the United States in order to escape the relationship. U. surreptitiously applied for a visa, which was granted, and entered the United States on May 20, 2016 without telling E. Later, U. called E. to tell him where she was after she heard that he had been threatening her friends and family trying to find her. When they spoke on the phone, E. threatened to harm her if she ever returned to Mongolia. NIJC timely filed U.'s skeletal asylum application in May, 2017. Her *pro bono* attorney will need to file all of her supporting documents the week before her interview, which will likely occur about two years after the application was filed.

### **Asylum Claims Based on Political Opinion or Opposition to Criminal Organizations**

*Political opinion-based asylum claims represent the stereotypical asylum case and are often more straight-forward than other types of asylum cases. Asylum claims based on opposition to cartel or gang violence may involve a political opinion-based claim, but are typically based on the protected ground "membership in a particular social group" as well. These claims offer an opportunity to navigate a nuanced and rapidly evolving area of asylum law. NIJC has successfully represented men, women, and children from Central America and Mexico who fear cartel and gang violence and has the resources to help pro bono attorneys prepare strong cases for these asylum seekers.*

#### ***26. B. is a woman from the Democratic Republic of the Congo. B. lives in Chicago and speaks French. (17-0119090)***

B.'s father was active with the UNC, a Congolese opposition party. In 2012, B.'s extended family reported her father's political activity to the Congolese government. Shortly after, several masked men attempted to break into B.'s house. The men kidnapped two of B.'s family's guards before hearing gunshots and fleeing. On another occasion, B. was in the car with her father when they were shot at. Later, men grabbed B. on her way home and tried to rape her, telling her she would die because of her father's anti-government activity. B.'s parents sent her to study in the United States, hoping the situation would improve after the election. However, in 2014, B.'s father was arrested and detained for two weeks. In 2015, the president announced plans to extend his term and mass opposition protests began. The Congolese government came to B.'s family home, murdered a guard, and kidnapped her parents. B.'s uncle tried to locate them, but the Congolese government came after him and he fled the country. B.'s parents remain missing. Realizing her life was in danger, B. filed a pro se asylum application. Her supporting documents will be due one week before her interview, which will likely be scheduled in the next few months.

#### ***27. H. is a woman from Honduras. Her next Master Calendar hearing is on November 8, 2017. Her son, D. will be a derivative on her application and is also independently eligible for asylum. As an unaccompanied alien child, the asylum office has initial jurisdiction over his asylum case. H. and her son speak Spanish and lives in Northcentral Indiana.***

*(16-0111518), (17-0115137)*

H. lived in a neighborhood controlled by gangs in Honduras. She overheard gang members planning a massacre one night and learned the next morning that the gang had killed nine family members in a nearby neighborhood. H. shared what she knew about the crime with police, identified the gang members, and testified against them in court. Gang members found H. and told her that she knew what she had done and would pay for it. After moving to different parts of the country, H. then went into a witness protection program but still felt unsafe. H. fled to the United States in 2004, but that same year, an immigration judge ordered H. removed *in absentia* after she failed to appear for a Master Calendar hearing. Around 2010, the gang members who were seeking to punish H. for testifying against them recognized H.'s teenage daughter in Honduras and raped her. After H. found out about the attack, H.'s daughter and son came to the United States as unaccompanied minors around 2012. In 2017, NIJC filed H.'s asylum application with a motion to reopen her case before the Chicago Immigration Court. The motion was granted, and H. is now able to pursue her asylum claim. H.'s *pro bono* attorneys will need to argue H. meets an exception to the one-year filing deadline and prepare supporting documents prior to her merits hearing, which has not yet been scheduled. The Department of Homeland Security (DHS) has issued a Notice to Appear (NTAs) to H.'s son D., but DHS has not yet filed his NTA with the immigration court, so he is not in removal proceedings. Although D. may be able to obtain asylum as a derivative on his mother's case, he is also independently eligible for asylum and his asylum claim will be adjudicated by the asylum office. The family's attorneys should file D.'s asylum application with USCIS as soon as possible. His supporting documents will be due one week before his interview, which is likely to occur about three months after filing.

***28. G. is a man from El Salvador. His merits hearing is on April 22, 2020. G. speaks Spanish and lives in a northern suburb of Chicago. (17-0114097)***

G. lived in a neighborhood controlled by the Mara 18 gang. Because of this, members of the Mara Salvatrucha (MS) gang, including G.'s cousin, frequently threatened him, and the police regularly beat him and accused him of being a gang member. G. fled to the United States, but his smugglers kidnapped him and other migrants, holding them hostage for several weeks and mistreating them. After the group crossed into the United States, immigration arrested them and asked G. to testify against one of the smugglers. G. testified and the smuggler was convicted. Because the smugglers have connections to G.'s hometown, G. fears they would harm him because he testified against them. G. also fears that the Mara 18 will view him as a traitor for fleeing their territory and that the police and MS will continue to target him due to his prior connection to the Mara 18. NIJC filed G.'s asylum application with the immigration court. His *pro bono* attorneys will need to argue G. merits an exception to the one-year filing deadline but G. understands he may only receive withholding of removal. His *pro bono* attorneys will also need to prepare affidavits and other supporting documents prior to his merits hearing, which has not yet been scheduled.

***29. O. and T. are a father and daughter from Honduras. Their next Master Calendar hearing is January 10, 2018. They speak Spanish and live in Chicago, Illinois. (17-0113595), (17-0113596)***

One night, O. witnessed the Mara 18 gang murder his neighbor. When the police arrived, O. described the assailants to the police and sent the police in the assailant's direction. As a result, the police arrested one of the Mara 18 members. Shortly after, O. began receiving frequent phone threats from the gang. The gang asked what O. had seen and reported, and they threatened to kill him for having worked with the police. When the gang started threatening to kill O.'s daughter T., they fled Honduras. O. passed a Reasonable Fear Interview and is eligible for withholding of removal, while T. is eligible for asylum. NIJC timely filed O. and T.'s asylum applications. Their *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to their merits hearing, which has not yet been scheduled.

***30. P. is a man from Togo. His Master Calendar hearing is on December 13, 2017. P.'s wife, L., is not in immigration court proceedings and is independently eligible for asylum. P. and L. speak French and live in Chicago, IL. (17-0115018) and (17-0115921).***

P. and L. married in 2012. In 2015, L.'s father, who was active in opposition politics, was arrested, detained, tortured, and killed by the Togolese government. P. was close to L.'s father, and after his death P. and L. received anonymous threatening messages even though P. was a business man and was not involved in politics. In late 2015, P. and his wife visited the United States to attend his brother's wedding. While in the United States, he received a call from an employee telling him that the Togolese military had come to P.'s office looking for him and had arrested his secretary. P.'s employee said that they were looking for P. because they received reports that he had been responsible for organizing a student-led protest against the government at the local university. The military said they would not release the secretary until they had P. in custody. L. remained in the United States while P. flew to Ghana and then crossed into Togo on foot in order to help secure the release of his secretary. When he arrived in Togo, his neighbor told him that the military had arrested all of his remaining employees and ransacked his house looking for him. P. stayed with his neighbor for several days, but the neighbor was too afraid of the military to keep him and told him he had to leave. P. fled Togo and returned to the United States before the military could find him. P. arrived in the United States for the second time on February 26, 2016. When P. arrived at the airport, he expressed a fear of return, was detained. After passing a credible fear interview, he was placed in removal proceedings to seek asylum. P. timely filed his asylum application. NIJC filed L.'s asylum application but it was not filed before the one-year deadline had passed. Their *pro bono* attorneys will need to prepare P.'s affidavit, brief, and other supporting documents prior to his merits hearing, which has not yet been scheduled, and L.'s affidavit and cover letter prior to her asylum interview, which will likely occur two years after her application was filed in July 2017. If L. is referred to the immigration court prior to P.'s merits hearing, then their cases can be consolidated before the court.

***31. S. and her husband K. are from El Salvador. They are both independently eligible for asylum. Their daughter, R., will be a derivative on both S. and K.'s applications. S. and R.'s next Master Calendar hearing is on January 25, 2018. The family speaks Spanish and lives in North Central Indiana. (17-0114070), (17-0113291), (17-0113292)***

S.'s husband, K., sold candy from a truck in El Salvador. Gang members robbed K. multiple times, and he reported the robberies to local authorities. After being robbed at gunpoint around

December 2014, K. reported the incident, even though the gang members told him they would kill him and his family if he did so. Soon after K. spoke with the prosecutor's office, gang members repeatedly threatened him, saying that they knew he had reported them and they would kill him and his family for doing so. K. fled El Salvador in May 2015 and entered the United States without inspection or contact with immigration officials. Afterward, S. received a phone call from the gang, telling her that if K. wanted S. and their daughter R. to remain alive, he had to pay the gang \$1000 per month. Fearing for her life, S. stopped leaving the house and waited until she had enough money to flee El Salvador with her daughter. S. and R. were apprehended by immigration upon entering the United States. NIJC filed S.'s skeletal asylum application with the immigration court. The family's *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to their merits hearing, which has not yet been scheduled. Because K. is not in removal proceedings, NIJC filed his skeletal asylum application with USCIS. The family's *pro bono* attorneys will need to argue that K. merits an exception to the one-year filing deadline. Affidavits and other supporting documents will be due shortly before his asylum interview, which will be scheduled in two or three years.

**32. L. is a man from Mexico. His next Master Calendar hearing is scheduled for February 28, 2018. L. lives in Chicago, IL and speaks Spanish. (17-0116219)**

L. first entered the United States in around 1995, returned to Mexico, and then came back to the United States in about 1999. In about 2013, while L. was in the United States, the Zetas cartel began to extort and threaten L.'s sister, who owned a shop in Veracruz. When she closed her shop because she could not pay, they murdered her husband. Soon after, L.'s son Y. was deported from the United States and after he arrived back in Mexico, the Zetas began to extort and threaten him. When Y. did not pay, they murdered him. After Y.'s murder, the cartel also threatened L.'s sister and daughter, promising to kill them if they reported them to the police. In late 2016, L. returned to Mexico to visit his dying mother and the Zetas quickly learned he was there. They began asking and threatening his daughter about him; L. believes they wanted to extort him since he had been in the United States and also believed he might want revenge for their murder of Y. In early 2017, shortly after his mother's funeral, his sister saw one of the Zetas' cars near their house and told L. to flee. After he escaped, the Zetas asked his sister about his location. L. immediately fled to the United States, entering on January 22, 2017. Soon after L. fled Mexico, the Zetas found L.'s brother in the street, demanded to know L.'s location, and beat him when he did not know. L.'s has several DUI convictions from the early 2000s, but none since then. These convictions will not bar L.'s asylum eligibility. NIJC will timely file L.'s asylum application with the immigration court. L.'s affidavit and other supporting documents will be due prior to his merits hearing, which has not yet been scheduled.

**33. N. is a man from Ethiopia. N. speaks Amharic and lives in Chicago, IL. (17-0120439)**

N. served as president of his high school's student union in Ethiopia. He often met with students from other schools to discuss the government's human rights abuses. During a meeting with government officials in early 2017, N. spoke out against the illegal arrests and killings of anti-government protestors. Later that day, police officers arrived at N.'s home and arrested him. N. was detained for approximately one month in a detention center for political prisoners, during which time he was beaten and tortured almost daily. Eventually, N.'s father bribed a government

official to allow N.'s conditional release. Upon release, officials threatened to arrest N. and his family if he spoke out against the government again. N. fled to the United States about one month later. When N. did not return to the jail for a check-in the following month, police officers arrested N.'s father. N. filed a timely, pro se I-589 asylum application with USCIS. His affidavit and supporting documentation will be due two weeks before his asylum interview, which will be scheduled in two or three years.

***34. F. is a man from Cameroon. He speaks French and lives a southwestern Chicago suburb. (17-0119058)***

F. was a successful shopkeeper in Douala. In 2012, F. became a member of an opposition party and distributed party materials from his shop to help recruit customers to join the party. In 2015, police arrest F. at his shop and detained him for approximately three weeks. During his detention, the police interrogated and beat him daily regarding his political activities. After his release, F. continued to promote the party from his shop. In 2016, policemen came to his shop and arrested him again. They interrogated him about his party involvement and beat him, leaving scars. After a few weeks, he was released but only after he signed a form promising to stop supporting the party. F. continued to distribute party materials, but stopped attending party meetings. In April 2017, F. came to the United States on a business trip. While here, F.'s wife informed him that police had broken down the door to their home to search for him, and when they discovered he was not there, they raped her. F. now fearing that he would be imprisoned and tortured again if he returned to his country. USCIS must receive F.'s skeletal I-589 asylum application by April 3, 2018. Affidavits and other supporting documents will be due two weeks before his asylum interview, which will be scheduled in two or three years.

***35. S. is a young man from Ethiopia. S. speaks Amharic and lives in Chicago, IL. (17-0120778)***

While visiting the United States in 2016, S. learned of the Ethiopian government's record of human rights abuses. S. returned to Ethiopia and helped organize students at his school to protest against the government. In August 2016, S. marched with several thousand other citizens in a demonstration that ended when government forces began shooting at the crowd. Later that day, police officers came to S.'s home looking for S. Police officers beat S.'s father and killed S.'s brother before arresting S. Police tortured S. throughout the month he spent in jail. Eventually, S.'s father bribed a government official for S.'s release. After S.'s release, police frequently followed and interrogated him. When S. learned that police were arresting students like him for a second time, S. fled to the United States. A few days later, police officers came to S.'s house looking for him and, when they discovered he was not there, arrested S.'s father. S. filed a timely, pro se asylum application with USCIS. His affidavit and supporting documentation will be due two weeks before his asylum interview, which will be scheduled in two or three years.

***36. C. is a woman from El Salvador. C's next Master Calendar hearing is on May 9, 2018. C. speaks Spanish and lives near Kankakee, IL. (17-0113323)***



The Mara 18 gang began to target C. and her family in 2016, after she began to run a small store out of a home in her neighborhood that had previously been occupied by one of her friends. This friend had fled to the United States after being repeatedly targeted by the same gang and she and her family are currently seeking asylum through NIJC. Shortly after C. opened her store, the Mara 18 began to extort her, referencing her connection to her friend. She could not pay the money and told the gang she would close the store, but they threatened to kill her children if she didn't find the money some way. Soon afterwards, one of the gang members came to her home, forced her to leave with him and then raped C. A short time later, police came into C.'s community and began targeting certain gang members, causing the gang to believe that C. had reported them. They began to threaten C.'s husband, claiming C. had reported them to the police, and began extorting them again. The same gang member also returned and raped C. again, telling her she belonged to him. A few months later, C. learned she was pregnant, but was not certain of the father. The gang member who raped her was in prison at this time, but his sister told her that the gang member wanted her to go to the prison so they could resume their relationship and that she had to have an abortion, or the gang would force her to abort the child. C. fled the country with her husband and several children, but they were deported back to El Salvador by Mexican immigration officials. Upon her return, the gang member's sister told her if she left again, they would force her to have an abortion and hurt her other children. C. then fled again, leaving her husband and children behind in hiding. NIJC has timely filed C's asylum application with the immigration court. Her affidavit and other supporting documentation will be due shortly before her merits hearing, which has not yet been scheduled.

***37. D. is a man from Chad. He speaks French and lives in Northeast Indiana. (17-0113702)***

Upon graduating from high school in Chad, D. began working for an NGO that advocated for human rights. While working at the NGO, he participated in several protests and spoke with student groups about corruption in the Chadian government. During these protests, the police used violence to disperse protestors. After D. participated in several protests, he received threatening text messages telling him to stop opposing the government or he would pay. Others members of the NGO also received threats. Although he was afraid, D. continued to protest and hoped things would calm down so he could stay in Chad to advocate for human rights. During a large protest in N'Djamena, men kidnapped and detained D. for several weeks. During this time they tortured him and told him that his actions were illegal and if he did not stop they would kill him or his family. The men also threatened to find him if he told anyone that he was kidnapped and tortured. D. went into hiding in rural Chad and then fled to the United States. NIJC timely filed his skeletal asylum application in August 2017. His supporting documents will be due one week before his interview, which will likely occur about two years after his application was filed.

***38. C. is a woman from Eritrea. She speaks Tigrinya and lives in Indianapolis, IN. (17-0115610)***

In the 1990s, Eritrean authorities killed C.'s husband because of his anti-government political opinions. Around that same time, police officers raided C.'s home and accused C. of working for anti-government organizations. Around 2003, C.'s son became a Pentecostal Christian, which is a banned religion in Eritrea, and he was arrested several times as a result. In about 2006, after

C.'s son was released from prison, he fled to Ethiopia. The Eritrean government then went to C.'s house to look for him and arrested and was imprisoned and tortured for several weeks. C. was released but was then arrested and imprisoned several years later for her involvement in a farmer's union and her anti-government speeches. C. was released from prison only after she promised that she would recruit for the ruling party. C. timely filed her asylum application with USCIS. Affidavits and other supporting documents will be due shortly before her asylum interview, which will be scheduled in two or three years.

**39. R. is a woman from Guatemala. Her son, T., will be a derivative on her application and is independently eligible for asylum. Their merits hearing is on June 7, 2021. R. and T. speak Kanjobal and T. also speaks Spanish. They live in Champaign, IL. A family member has been interpreting in Kanjobal for them, but their pro bono attorneys should expect to pay an interpreter for some case preparation. NIJC can assist with securing an interpreter. (16-0111803), (16-0111805)**

R.'s husband (T.'s father) hit T. as he was growing up and regularly raped R. When T. was older, the Mara Salvatrucha (MS) started recruiting and threatening T. When he refused to join them, they kidnapped him and kept him for a month. They demanded R. pay a ransom for his release and when they let T. go, they told him the next time he would join or die. Soon after, they told T. he had one week to join the gang. Around the same time, R.'s husband began seeing another woman and threatened to harm R. and T. if they didn't leave the country. Fearing for their lives, R. and T. fled to the United States. NIJC timely filed R. and T.'s asylum applications. Their *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to their merits hearing.

**40. B. and T. are a husband and wife from Mexico. Their children, A. and E., will be derivatives on their applications. Their merits hearing is on October 26, 2021. B. and T. speak Spanish and live in Chicago, IL. (17-0115637), (17-0115363), (17-0115635), (17-0115638)**

B. was friends with a municipal police officer, G., who became corrupt. When B. and T.'s son A. was in junior high, G. found A. in school and threatened to harm him if he did not sell drugs for a cartel. A. began staying home from school, but soon after, B. and T. received threatening calls insisting that A. sell drugs. G. and several other officers showed up and B.'s business, demanding A.'s participation. B. begged G. to negotiate with his commander and the officers left, taking several kilos of silver from B.'s silver shop as a bribe. The threatening calls continued, referencing the family's whereabouts, threatening A.'s life, and demanding money for his safety. The officers again found B. at the family's home and demanded a large sum of money. One officer hit B. when he said he could not pay. B. begged G. for time to sell his car and get them the money and G. agreed, but threatened to kill B. and his family if they did not get the payment. B. sold his car and used the money to flee with his family. Soon after they left, B.'s cousin was murdered and T.'s brother's house was burglarized. NIJC timely filed B. and T.'s asylum applications. Their *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to their merits hearing.

**41. P. and her daughter, L., are from Honduras. They are both independently eligible for**

***asylum. P.'s daughter, L., is a derivative on P.'s application. They speak Spanish and live near Northcentral Indiana. (17-0116572) (17-0116578)***

The Mara 18 gang killed P.'s cousin in Honduras and because P. and her daughter were with P.'s cousin when he was killed, the gang immediately targeted P. and her daughter afterwards. They ransacked P.'s home and left a note saying that she and her daughter would be next if they said anything about what they had seen. P. and L. went into hiding and fled the country about one month after the murder. Although P. and L. were each issued a Notice to Appear (NTA), the Department of Homeland Security (DHS) has not filed the NTA with the immigration court, so they are not yet in removal proceedings. Unless and until DHS files the NTA with the court, USCIS has jurisdiction over their asylum applications. NIJC timely filed P. and L.'s skeletal asylum applications with USCIS. Their *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to their interview or merits hearing.

***42. B. is a woman from Turkey. She speaks Kurdish and Turkish and lives in Chicago, IL. Her husband and children will be derivatives on her application. (17-0116660), (17-0117052), (17-0117050), (17-0117051)***

B. is Kurdish and of the Alawite sect of Islam. She is a member of the People's Democratic Party (HDP), a pro-Kurdish party in Turkey. In her role at HDP, B. helped displaced women receive job training, education, and employment. She also hosted displaced Kurdish families in various properties she owned. B. has been arrested and questioned by police on over twenty occasions for her political involvement with HDP. In 2014, B. was serving on the PTA at a local school and a conflict arose between the school's administration and the Alawite families that attended the school. B. represented the Alawite families and the conflict became widely publicized in the news. B. was arrested and detained for several days for her role in representing the Alawite families. In 2016 B. was arrested and detained for her involvement with HDP. She was physically and psychologically tortured while she was detained. B. fled Turkey and arrived in the United States on November 7, 2016. NIJC timely filed B.'s asylum application with USCIS. Her *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to her asylum interview, which will be scheduled in two or three years.

***43. R. is a man from Eritrea. His master calendar hearing is on April 25, 2018. R. speaks Tigrinya and lives in Chicago, IL. (16-0109287)***

As a teenager, R. was forcibly conscripted into the Eritrean National Service, a mandatory government service program required of all Eritreans. As part of his National Service, R. was sent to a labor camp to work for several years. One day, when he arrived late, he was accused of trying to desert the National Service and was detained and beaten over the course of several weeks. He was then required to continue his National Service work and eventually forced to work as a teacher. When R. asked permission for leave so that he could get married, the government refused to give permission. He left and got married anyway and did not return to his post. Government forces then arrested and detained him for about a month. During this time, they interrogated him, accused him of working against the government, and tortured him. He was released from prison, but sent back to his post as a teacher. Not long afterwards, R. fled to Kenya and then eventually made his way to the United States in December 2105 and requested asylum

at the U.S. border. After passing a credible fear interview, R. was placed into removal proceedings to seek asylum. R. timely filed his skeletal asylum application. His *pro bono* attorneys will need to prepare his affidavit and other supporting documents prior to his merits hearing, which has not yet been scheduled.

**44. R. is a woman from Mongolia. She speaks Mongolian and lives in Chicago, IL. (16-0109397)**

R. worked as an accountant for a mining company and frequently visited mining sites. During these visits, R. saw that mining companies, which had close ties to the Mongolian government, were not complying with environmental protection regulations. A reporter interviewed R. about what she saw and the clip aired on television. Soon after, R. began receiving death threats via phone. R. went to the police, but the police accused her of lying, detained her overnight, and hit her. Shortly after, a group of men attacked R., beat her, and discussed killing her before bystanders intervened and R. was hospitalized. A few days later, a mob kidnapped and badly beat R.'s brother, telling him it was punishment for not keeping his sister quiet. The situation made R.'s boyfriend's family resent R., and they began threatening R., while R.'s boyfriend became physically and verbally abusive. R.'s boyfriend ended the relationship under pressure from his family, but R. still feared harm from him, his family, and her attackers. R. fled Mongolia and arrived in the United States on March 18, 2015. She timely filed her I-589 asylum application with USCIS in March 2016. Her affidavit and other supporting documentation will be due one week before her interview, which will likely occur within two years of the filing date.

**45. R. and S. are cousins from Egypt. They speak Arabic and live in Chicago, IL. (17-0116671), (17-0116674)**

Throughout their lives, R. and S. suffered discrimination and threats for being Coptic Christians. While working in Libya, several of R. and S.'s family members were kidnapped and murdered by the Islamic State. Hearing of the murders, R. had a nervous breakdown and was hospitalized. The pope of the Coptic Christian church canonized the murdered family members as martyr saints, and Egypt's president gave permission for a church to be constructed in their honor. Shortly after construction began, the threats and violence surged. In one instance, suspected Muslim Brotherhood extremists attacked their church while R. and several others were inside. S. rushed to the church, but was attacked and badly beaten on his way. Extremists also attacked R.'s land, saying they would kill him like they killed his brother, and tried to kill him as he repaired his murdered brother's house. The cousins fled to the United States where they attended a conference for persecuted Christians. R. and S.'s friends report that extremists found out about the conference, putting R. and S.'s lives in danger if they return. USCIS must receive their skeletal asylum applications by May 8, 2018.

**46. M. is a man from Chad. He speaks French and lives in Chicago. (17-0118552)**

In 2016, members of M.'s ethnic group organized a peaceful protest against the government after men from the president's ethnic group gang raped a young girl from M.'s ethnic group. M. did not participate in this protest, but afterwards, the police arrested him as part of campaign to target

members of his community after the event. They interrogated him about his connection to the organizers of the protest, and tortured him when he denied involvement. M. was imprisoned for approximately three weeks, and was released on the condition that he spy on members of his community. M. had to report on his efforts to gather information to a local official and the police repeatedly threatened to imprison him again if he did not comply. M. applied for a tourist visa and entered the United States on October 22, 2016. NIJC timely file his I-589 asylum application with USCIS. His *pro bono* attorneys will need to file affidavits and other supporting documents one week prior to his asylum interview, which will be scheduled in about two years after the filing date.

***47. P. is a woman from Togo. P. speaks Ewe and lives in Chicago, IL. (17-0118466)***

P. worked at a market selling clothes. One day, the Togolese government arrested and beat P. and other market sellers, accusing them of supporting an opposition party. This experience motivated P. to join the UFC and later the ANC, both political opposition parties. One day, a fire broke out at the market where P. sold clothes. The Togolese government, blaming the ANC for the fire, arrested P. outside her home and detained her. For several weeks, government soldiers beat, raped, and tortured P. while accusing her of having burned down the market. Later, while P. was in a hospital recovering from her injuries, government soldiers brought a summons to her home. P. escaped to Benin, but government continued to search for her, once beating her husband when P. was not at home. When P. heard reports that the Togolese government was arresting opposition members in Benin, she fled to the United States. NIJC will timely file P.'s asylum application with USCIS in September 2017. Her *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to her asylum interview, which will be scheduled in about two years after the filing date.

***48. B. is a woman from Eritrea. She speaks Arabic and Tigrinya and lives in Chicago, IL. (17-0114211).***

B. was born in Saudi Arabia to Eritrean-born parents. She has Eritrean citizenship and temporary status in Saudi Arabia through her father's work sponsor. B.'s family returned to Eritrea when she was infant but subsequently fled Eritrea again several months later after her father was arrested and tortured on account of his political activities. While she was a student in Saudi Arabia, she organized and participated in meetings about women's rights. One day her group was caught meeting and she was arrested by the Saudi government's religious police for her attendance and activity at these group meetings. She was put in jail and was detained there for a month. She was accused of speaking against Islam and she was tortured for a month until her father's sponsor paid for her release. Her husband's sponsor then demanded that she be given in marriage to his friend's son in exchange for the money he paid for her release. In order to escape the threats from the religious police and her father's sponsor, B. fled Saudi Arabia and arrived in the United States on December 18, 2016. B. timely filed her asylum application with USCIS in March 2017. Her supporting documents will be due the week before here interview, which will likely occur about two years after her filing date.

***49. M. is a man from Honduras. His merits hearing is scheduled for January 10, 2022. M. speaks Spanish and lives in Chicago, IL. (17-0113244)***

In 2013, M. lived with his uncle and grandmother in Honduras. That year, the 18th Street gang began to extort his uncle, a mechanic shop owner. A week after M.'s uncle was unable to meet the gang's demands, he was murdered and his body was left on the street near their home. Fearing for their lives, M.'s grandmother fled to the United States and M. relocated to another district in Honduras, hours away. Almost a year after his uncle's murder, gang members violently attacked a second uncle of M. because of his relationship to the first uncle (his brother) who had been killed. Then, in January 2016, the gang left a note at M.'s door, giving him an ultimatum: leave Honduras in three days or be killed. He fled the country the next day, traveling first to Mexico, where he stayed until he could save enough money to travel to the United States. NIJC timely filed his asylum application. His affidavit and other supporting documents will be due prior to his merits hearing.

***50. S. is a woman from Honduras. S.'s children, G., A., and J. are derivatives on her asylum application and are independently eligible for asylum. Their next Master Calendar hearing is on August 14, 2018. S. and her children speak Spanish and live in northern Indiana. (17-0118079), (17-0119075), (17-0120239) and (17-0120242).***

S. entered a long-term relationship with R., the father of S.'s children, when she was about 18 years old. R. physically and verbally abused S. throughout their relationship. S. and R. moved to the United States around 2005 to earn money to support their growing family. During that time, S. entrusted family members in Honduras with the care of her daughters, G. and A. Unfortunately, G.'s and A.'s aunts and uncles physically and sexually abused the young girls while S. and R. were living in the United States. S. and R. returned to Honduras in 2009. However, R. continued to abuse S. and gamble away the little money they had, so S. evicted R. from the family home and opened a small store to support her family. A criminal organization loaned S. money for her business. When S. could not afford to pay the excessive interest rate on the loan, the criminal organization threatened to kill S. and her children. S. sold her business to avoid further harm. Meanwhile, S. entered a relationship with U., who raped, abused, threatened, and stalked S. and sexually assaulted S.'s oldest daughter, G. Fearing for her life and the wellbeing of her children, S. fled to the United States with her children in May 2016. Although S. and her children were ordered removed after missing a court hearing, NIJC successfully reopened their cases earlier this year. S. and her children filed their asylum applications together with their motion to reopen on June 20, 2017. The family's pro bono attorneys will need to supplement their applications with affidavits, a brief, and supporting documents prior to their merits hearing, which has not yet been scheduled.

***51. P. is a man from Iran. P. speaks Farsi and lives in Champaign, IL. His merits hearing is scheduled for March 1, 2022. (17-0119063)***

P. is a Christian convert and was involved with the Green (opposition) Movement in Iran. After the 2009 election, the Revolutionary Guard arrested, detained, and beat P. because he was attending a Green Movement march to protest the election results. P. was later released on bail, but told that he could be arrested again at any point for his actions. Some years later, P. connected with a Christian friend of his mother and began to covertly explore Christianity, which eventually led to his baptism in a secret ceremony. In February 2016, P. learned that the

Revolutionary Guard had arrested a Christian friend, confiscated P.'s laptop, which had information materials about Christianity on it, and raised his home. Fearful for his life, P. fled Iran and arrived in the United States on September 24, 2016. P. filed a timely, pro se asylum application. His affidavit and other supporting documents will be due shortly before his merits hearing.

### **VAWA Cases**

***52. D. is a 51-year-old woman from Mexico. D. is eligible to file a VAWA self-petition. D. speaks Spanish and lives in Chicago. (16-0105353)***

D. married her abusive husband R. in 1990. Throughout their marriage, R. was physically and emotionally abusive towards D. On one occasion D. confronted R. after she learned that he was having an affair and he grabbed her and threatened to hit her. D. reported the incident to the police, but R. was not arrested. After suffering for many years, D. left her husband in 2011. D. has since obtained counseling and wishes to remain in the United States.

***53. F. is a 29-year-old man from Mexico. F. is eligible to file a VAWA self-petition. F. speaks Spanish and lives in Chicago. (17-0115646)***

F. married his abusive U.S. citizen spouse, V., in 2016. Shortly after their marriage, F. found out that V. was addicted to heroin and other drugs. Throughout the marriage, V. would physically, emotionally, and economically abuse F. to support her drug addiction. Incidents of violence occurred during the relationship leading F. to get orders of protection against V., which he later vacated in hopes of saving their marriage. Recently, V. stole F.'s car and his money. F. is now separated from his wife and is working on filing for divorce.

***54. A. is a 26-year-old woman from Mexico. A. is eligible to file a VAWA self-petition concurrently with an application for adjustment of status. A. speaks English and Spanish and lives in Cicero. (17-011855)(17-0119017)***

A. was the victim of domestic violence at the hands of her husband and father of her children, F. A. dated F. for seven years before marrying him in 2016. F. emotionally and physically abused A. throughout their relationship. A. has called the police multiple times to report F.'s abuses. A. has now left F. and obtained an order of protection against him. F. frequently threatens A. and tells her that he is going to call immigration and get A. and her family deported. A. desires to stay in the United States to continue supporting her children and rebuild her life.

***55. T. is a 23-year-old woman from Mexico. T. is eligible to file a VAWA self-petition concurrently with an application for adjustment of status. T. speaks English and Spanish and lives in Chicago. (17-0118223) (17-0117739)***

T. was the victim of domestic violence at the hands of her husband and father of her daughter, O. Throughout their relationship, O. emotionally and physically abused T. T. called the police multiple times to report O.'s abuses. On one occasion, O. punched T. in the face several times.

T. has since left O. and has obtained an order of protection against him. T. desires to stay in the United States to continue supporting her children and rebuild her life.

**56. L. is a 44-year-old woman from Panama. L. is eligible to file a VAWA self-petition concurrently with an application for adjustment of status. L. speaks Spanish and lives in a suburb of Chicago. (17-0119720), (17-0120851)**

L. married her abusive husband F. in 2015 in Panama. Shortly after their marriage, F. began to emotionally and sexually abuse L. When she came to visit him in the United States, F. would not let L. have access to money or a phone and began to control her. F. manipulated L. into overstaying her visa and refused to file paperwork to legalize her status. F. regularly criticized L. and called her a prostitute. L. sought counsel through her church and has received therapy. L. has since separated from her abusive husband and is seeking a divorce.

**57. G. is a 35-year-old woman from Ghana. G. is eligible to file a VAWA self-petition. G. speaks English and lives in northern Illinois. (17-0118788)**

G. came to the U.S. as a student to pursue her master's degree in financial management and investment banking. While she was in school, G. became involved in the Church of Pentecost where she met her husband D. The couple married in November of 2016. Shortly after their marriage, D. began emotionally, physically, and sexually abusing G. G. sought help at their church and began obtaining counseling. G. eventually left her abusive husband and is now seeking a divorce.

### **U Visa Cases**

**58. C. is a 39-year-old woman from Mexico who is eligible to file a U visa application. C. requires a waiver of inadmissibility. C. speaks Spanish and resides in Aurora. C.'s application must be submitted to USCIS on or before March 23, 2018. (17-0115961), (17-0115966)**

C. was the victim of domestic violence. C. endured many years of abuse at the hands of her ex-husband and father of her children O. In one incident, O. got upset and threw a bottle at C. hitting her in the head. C. reported the incident to the police and left her abusive husband. C. wishes to remain in the United States with her children.

**59. M. is a 31-year-old woman from Mexico who is eligible to file a U visa application. M.'s children O. and G. will be derivatives of her application. M. and O. require a waiver of inadmissibility. M. speaks Spanish and resides in Chicago with her family. M.'s application must be submitted to USCIS on or before March 26, 2018. (17-0120581), (17-0120588), (17-0120591), (17-0120643), (17-0120594)**

M.'s U.S. citizen daughter, J., was sexually abused by her paternal grandfather when she was five years old. In early 2014, M. took J. to the doctor after J. told her that something "bad happened to her." During the doctor's visit, J. disclosed that on multiple occasions her



grandfather molested her. M. reported the abuse to law enforcement and continues to cooperate in the investigation of the crime of which her daughter was a victim.

**60. M.V. is a 41-year-old man from Mexico who is eligible to file a U visa application. M.V.'s wife M. will be a derivative of his application and they both require a waiver of inadmissibility. M.V. and M. speak Spanish, and they reside in Chicago. M.V.'s application must be submitted to USCIS on or before March 27, 2018. (17-0115691), (17-0120808), (17-0116825), (17-0120809)**

In 2016, M. was the victim of an armed robbery. M. was on his way to work when three individuals approached him and hit in the face with a gun. The offenders took M.'s phone and money. M. reported the incident to the police and had to go to the hospital for the injuries he sustained. Since the day of the robbery, M. continues to suffer from increased stress and distrust.

**61. H. is a 40-year-old woman from Mexico who is eligible to file a U visa application. H. requires a waiver of inadmissibility. H. speaks Spanish and resides in a suburb of Chicago. H.'s application must be submitted to USCIS on or before April 3, 2018. (17-0118710), (17-0120710)**

H. was the victim of domestic violence at the hands of her husband F. In one incident, F. arrived home after a night of heavy drinking and began to attack H. by punching her in the leg and elbowing her in the head. H. reported the incident to the police and F. was subsequently arrested. H. has since left F. and she wishes to stay in the United States. H. has five children and wants to continue working to support them.

**62. E. is a 45-year-old woman from Mexico who is eligible to file a U visa application. E. requires a waiver of inadmissibility. E. speaks Spanish and resides in Chicago. E.'s application must be submitted to USCIS on or before April 6, 2018. (17-0119656), (17-0121011)**

E.'s husband and father of her children, A., was murdered earlier this year during a drive-by shooting. E. has cooperated with law enforcement in the investigation of her husband's murder. E. is devastated by the loss of her husband, and wishes to remain in the United States with her family.

**63. N. is a 31-year-old woman from Mexico who is eligible to file a U visa application. N. requires a waiver of inadmissibility. N. speaks Spanish and resides in a suburb of Chicago. N.'s application must be submitted to USCIS on or before April 23, 2018. (17-0116277), (17-0120780)**

N. was the victim of domestic violence at the hands of her former partner and father of her children V. In one occasion, V. got upset after N. wouldn't let him use her car to go out with his friends, and he grabbed N. by the hair and began punching her. N. reported the incident to the police. N. has since left her abusive husband and wishes to remain in the United States to continue caring for her children.

**64. C. is a 31-year-old woman from Mexico who is eligible to file a U visa application. C. requires a waiver of inadmissibility. C. speaks Spanish and resides in Chicago. C.'s application must be submitted to USCIS on or before April 26, 2018. (17-0119948), (17-0120940)**

C. was the victim of domestic violence at the hands of her former partner and father of her son. On several occasions, the offender physically assaulted C. by punching her in the face and throughout her body. C. has left the abusive relationship and has filed an order of protection against the offender. C. wishes to remain in the United States to continue working and supporting her U.S. citizen son.

## **NIJC Announcements**

### **Immigration Procedural Updates**

NIJC encourages *pro bono* attorneys to regularly check NIJC's [Immigration Procedural Updates](#) page to learn about changes in immigration law, procedure, and case timing. Recent updates includes changes to the employment authorization application and mailing address, Chicago Immigration Court staffing, and interview timing at the Chicago Asylum Office.

### **New *Pro Bono* Resources Available**

NIJC is pleased to announce a number of new *pro bono* training webinars available on our website, including our *pro bono* webinar series. The webinar series includes:

- [Affidavit Writing 101](#)
- [Representing Survivors of Domestic and Gender Violence](#)
- [Representing Immigrant Children](#)
- [Representing Detained Immigrants](#)
- [Representing LGBT Immigrants](#)
- [Trauma Informed Best Practices](#)
- [Working with an Interpreter](#)
- [Implicit Biases and Culturally Informed Best Practices](#)
- [Central American Asylum Claims: Challenges and Solutions](#)
- [Gathering Evidence and Presenting Claims before EOIR and USCIS](#)

Additional training webinars can also be viewed at <http://immigrantjustice.org/training-webcasts>.