

August 22, 2019

**NIJC *Pro Bono* Case List: 56 cases need *pro bono* representation.**

NIJC's *pro bono* attorneys ensure access to justice and advocate for due process. By helping an immigrant navigate the complicated immigration system, ensuring an asylum seeker is not deported to a country where she faces persecution and torture, or protecting a family from separation through deportation, you can change a life!

**\*\*To find NIJC's most urgent matters, please search for "urgent"\*\*\***

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**HOW TO GET INVOLVED**

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 information about

- **Detained** cases, please contact Jesse Johnson at (312) 660-1681 or [jejohnson@heartlandalliance.org](mailto:jejohnson@heartlandalliance.org).
- **LGBT** cases, please contact Michelle Velazquez at (312) 660-1306 or [mivelazquez@heartlandalliance.org](mailto:mivelazquez@heartlandalliance.org).
- For all other **asylum** cases, please contact Anna Sears at (312) 660-1307 or [ansears@heartlandalliance.org](mailto:ansears@heartlandalliance.org).
- For **SIJS** cases, please contact Hillary Richardson at (773) 672-6601 or [hrichardson@heartlandalliance.org](mailto:hrichardson@heartlandalliance.org).
- For **U Visa** or **VAWA** cases, please contact Sylvia Wolak at (312) 660-1318 or [sywolak@heartlandalliance.org](mailto:sywolak@heartlandalliance.org).

For general information regarding *pro bono* opportunities at NIJC, contact Ellen Miller, *Pro Bono* Manager at (312) 660-1415 or [emiller@heartlandalliance.org](mailto:emiller@heartlandalliance.org).

## Asylum Cases

### Asylum: Expedited Family Cases

*Recently, as part of the Administration's plan to reduce immigration court caseloads, Chicago Immigration Court judges have been required to expedite the adjudication of certain "family unit" cases by scheduling them for merits hearings before remote judges based in "adjudication centers" in Texas and Virginia who will preside over the hearing via video-conference. NIJC has grave concerns about the due process violations that may occur during these hearings and knows access to counsel will be critical to ensure these asylum-seeking families aren't prejudiced by this new policy. These families urgently need pro bono representation.*

- 1. G. is a woman from Mexico. Her daughters, J. and Y., will be derivatives on her application. Their merits hearing is October 11, 2019. G. and her daughters speak Spanish and live in Chicago, IL. (18-0130988) (18-0130989) (18-0130990) \*Urgent\****

After separating from her husband, G. began to work odd jobs to support her family. While she was working, members of a Mexican drug cartel robbed and raped G. Several years later, members of the same criminal organization again robbed her while she was working and threatened to kill G. and her family. G. quit her job and decided to start a business in a neighboring state. Soon after, members of the same criminal organization robbed G.'s employees and burned G.'s automobile. They threatened to kill G. and kidnap her daughters. G. reported the threats to the police but did not receive any assistance. Then, fearing for their lives, G., J., and Y. fled to the United States. NIJC timely filed G.'s application for asylum with the immigration court. All affidavits and supporting materials to G.'s case will be due 15 days prior to her merits hearing in October.

- 2. F. is a woman from Honduras. Her daughter, B., will be a derivative on her application. Her merits hearing is November 1, 2019. F. speaks Spanish and lives in Chicago. (18-0128501) \*Urgent\****

After leaving the abusive father of her daughter B., F. moved back to her mother's house in the rural village where she grew up. Despite gang violence in their community, F. and her family were generally protected because of her mother's respected status as a pastor. In late 2017, F.'s brother, C., witnessed members of the Mara Salvatrucha (MS-13) massacre a group of bystanders outside a local bar. C. fled the scene unharmed, but the gang members knew that he had witnessed the crime and started trying to track him down and intimidate him so that he would not report to the police. One day when F. was home alone at her mother's house, gang members broke in looking for C. When they saw that her brother was not there, the gang members threatened F. and demanded to know where he was. F. refused to tell them, and the gang members beat her badly. They said that if they could not find her brother, that they would kill F. and her daughter instead. Fearing for her life, F. fled to the United States with her daughter without telling anyone else in her family. NIJC timely filed F.'s application for asylum

with the immigration court. All affidavits and supporting materials to F.'s case will be due 15 days prior to her merits hearing in November 2019.

- 3. S. is a woman from Guatemala. Her two sons, L. and M., will be derivatives on her application for asylum but are also independently eligible for asylum. Her merits hearing is March 5, 2020. S. speaks Spanish and lives in Chicago, IL. (18-0128717) (18-0128793) (18-0128798) \*Urgent\****

S. left school when she was a young girl to support her family when her father became too ill to work. She worked for years cleaning houses and washing clothes until she met her future partner at age 14. S. became pregnant at 15 and went on to have four children with her partner. In 2006, her partner died in a car crash and her newborn child died a few months later. Soon after, S.'s family members kicked her and her children out of their home and stopped supporting her. In early 2018, S. started receiving threatening phone calls and being extorted by men who said they would kill her sons if she did not comply with their demands. In July 2018, men approached L. and threatened to kill him and his family if S. did not pay immediately. Unable to pay and fearing for her life and the lives of her sons, S. fled to the United States with her children. NIJC timely filed S.'s application for asylum with the Immigration Court. All affidavits and supporting materials to S.'s case will be due 15 days prior to her merits hearing in March 2020.

- 4. H. is a man from Mexico. His daughter, R., will be a derivative on his application for asylum. Their next Master Calendar Hearing is September 3, 2019. H. and R. speak Spanish and live in Chicago, IL. (19-0135867) (19-0136345)***

H. lived and worked in a small community in Mexico, whose economy was dominated by a local mining company. Like many others in his community, H. had worked at the mine since it was opened in 2013, despite the fact that company subjected its employees to extremely harsh working conditions. Workers who complained or threatened to press charges against the mine frequently received death threats from members of Guerreros Unidos, a well-known narco-trafficking organization that was working with the mining company. In 2016, H. was elected commissioner of his town and quickly learned that other public officials were working closely with the mining company and Guerreros Unidos to resist demands from the mine's employees. H. began to organize strikes against the mine with his coworkers in 2017. On multiple occasions, members of Guerreros Unidos threatened H. and told him to end the strikes. Later, they tried to force him to allow Guerreros Unidos to establish their own police force within the community so that they could exert more control over the town. H. refused, and armed members of Guerreros Unidos began coming to his house and threatening to kill him if he did not comply. Fearing for his life, H. fled to the United States with his daughter R. in 2019. NIJC timely filed H.'s application for asylum with the Immigration Court. All affidavits and supporting materials to their case will be due 15 days prior to the merits hearing, which will likely occur in early 2019 because H. and his daughter have been designated a 'family unit' case.

## **Asylum: Detained Asylum Seekers**

*Because Immigration & Customs Enforcement (ICE) detains immigrants at government expense, detained asylum cases are adjudicated more quickly than non-detained cases. The detained*

*cases should be scheduled for a merits hearing about six-eight weeks after their asylum application is filed. As these individuals are often detained at county jails hours away from Chicago, pro bono attorneys conduct telephonic meetings with them in lieu of meeting in person. NIJC has successfully represented hundreds of men and women in detention and will help pro bono attorneys navigate the detention system and prepare strong cases.*

At present, all detained asylum cases have been placed with *pro bono* representation. If you are interested in representing a detained asylum seeker, please contact Jesse Johnson at [jejohnson@heartlandalliance.org](mailto:jejohnson@heartlandalliance.org).

## **Asylum: Unaccompanied Immigrant Children (UIC)**

*In recent years, thousands of children have fled 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. Children who meet the definition of an “unaccompanied immigrant child” at the time they file for asylum are able to seek asylum from the USCIS asylum office in the first instance, even if they are already in deportation proceedings.*

- 5. L. is a young woman from Honduras. Her son, K., will be a derivative on her application for asylum. Because L. will meet the definition of an unaccompanied immigrant child at the time she files for asylum, USCIS has initial jurisdiction her application for asylum, even though she and her son are in removal proceedings. Her next Master Calendar Hearing is March 3, 2020. L. and her son speak Spanish and live in Indianapolis, Indiana. (18-0129856) \*Urgent\****

L.’s father abused her from a young age. L.’s father threatened and attacked L., her siblings, and her mother. Even after L.’s mother tried to leave her father and moved the family to a new home, L.’s father moved close by and continued to come to the new home and abuse the family. L.’s father once grabbed K. forcefully and refused to let go while L. pleaded with him. Additionally, K.’s father, L.’s ex-partner, threatened L. with harm and death after she left him. K.’s father is a member of an armed vigilante group that purports to fight the gangs in Honduras. Fearing further abuse from her father and ex-partner, L. fled to the United States. USCIS must receive L.’s skeletal application for asylum, with K. included as a derivative, by October 9, 2019. All affidavits and supporting materials to L.’s case will be due one week prior to her interview at the asylum office, which will likely occur 4-6 weeks after filing.

- 6. M. is a young man from Guatemala. Because M. met the definition of an unaccompanied immigrant child at the time he filed for asylum, USCIS has initial jurisdiction over his asylum application, even though he is in removal proceedings. M.’s first Master Calendar Hearing has not yet been scheduled. M. speaks Spanish and Quiche and lives a suburb of Chicago, Illinois. NIJC will assist his pro bono attorneys in securing an interpreter. (18-0126866)***

M. grew up in a small village in Guatemala. When M. was around 16 years old, armed men from a criminal group began attempting to forcibly recruit him. These men frequently threatened

to kill M. and his family if M. did not agree to join them. On one occasion, they took M. to a secluded area and demanded that he plant marijuana in his family's fields and grow it for them. The men threatened M. with death if he refused. Fearing for his life, M. agreed to plant the marijuana. Over the following months, the armed men continued to threaten M. and his family. To escape the demands and threats of these men, M. cut down the crop of marijuana and fled Guatemala for the United States. NIJC timely filed M.'s application for asylum with USCIS in 2018. M. is currently awaiting an interview in his case at the asylum office. All affidavits and supporting materials to M.'s case will be due one week prior his interview at the asylum office, which has not yet been scheduled. The timeline for M.'s interview is unclear.

## **Asylum: 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.*

### **7. O. is a HIV positive, gay man from Venezuela. USCIS must receive his application for asylum by November 29, 2019. He speaks Spanish and lives in Chicago, Illinois. (19-0133801)**

O. has identified as a gay man since his early childhood, however he would hide most of his feelings towards boys because he was afraid that his Catholic parents would not accept him. As a young man, a priest at O.'s church routinely sexually abused him during rehearsals for Mass. Once at University, O. started dating and having relationships with men. During that time, O. experienced homophobic remarks by professors, criticizing him for not being 'enough of a man'. Once he began his professional career, he continued to receive homophobic remarks from co-workers who called him and another gay colleague "faggots" because they never had girlfriends. O. was diagnosed as HIV positive in 2007, when he was around 40 years old. O. was on different treatments from 2011 to 2018, however he felt that his symptoms were worsening. O. came to the United States in 2018 and was able to receive a specialized treatment that has improved his health significantly. O. believes that he will not be able to receive adequate treatment if he returns Venezuela. USCIS must receive O.'s skeletal application for asylum by November 29, 2019. Because this date is more than one-year since O. entered the United States, his *pro bono* attorneys will need to argue that O. merits an exception to the one-year filing deadline for asylum. NIJC will assist them in making that argument. All affidavits and supporting materials to O.'s case will be due one week prior to his interview at the asylum office, which will likely occur 4-6 weeks after the date of filing.

### **8. H. is a gay man from Jordan. USCIS must receive his application for asylum by January 7, 2020. H. speaks English and Arabic and lives in Northcentral Indiana. (19-0134963)**

H. was perceived as more effeminate than other boys from a young age, and other children frequently bullied him because of it. H. knew he could never be out as a gay man in Jordan, as his family made clear that they believed that being gay is a disease and not to be accepted. H.

believes that his family will likely disown him if he were to come out to them. Starting in H.'s second year of high school, his cousin started sexually abusing him while using homophobic language. H. told another family member about this abuse, as he is afraid the abusive cousin will use this against him in the future. H. came to study in the United States in 2017, and has returned to Jordan during several times since then. Since attending University in the United States, however, H. has been open about his sexual orientation, including on his social media. He is afraid to live as an openly gay man in Jordan and fears that people will know he is gay since he is now accustomed to being publicly open. USCIS must receive H.'s skeletal application for asylum by January 7, 2020. All affidavits and supporting materials to H.'s case will be due one week prior to his interview at the asylum office, which will likely occur 4-6 weeks after the date of filing.

**9. J. is a gay man from Mexico. He lives in Chicago. He is deaf and communicates using ASL. His merits hearing is on September 3, 2020. (15-0103571).**

J. had a difficult and isolating childhood; students who perceived him as gay or feminine harassed and groped him at school. When he was about seven years old, he was raped by a family friend. Hearing people also mocked him, and he believes that accommodations for deaf individuals are generally not available in Mexico. J. is concerned about his ability to live and work safely in Mexico where he sees himself as doubly vulnerable because he is deaf and gay. J. entered the U.S. in May of 2002 and filed his asylum application in late 2012 with the help of an attorney in California who works with deaf clients and has an agreement with the Los Angeles Asylum Office regarding the scheduling of interviews for deaf individuals. This system resulted in three canceled interviews in 2013 and 2015, and in 2017. J. was issued an NTA for failing to attend an interview on August 4, 2017, which his attorneys had advised him not to attend because he was already living in Chicago at that time. His affidavit and other supporting documents will be due a few weeks prior to his merits hearing which has been set for September 2020.

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

*Although many adjudicators have historically believed that the case law regarding domestic violence and gender violence-based asylum claims was unclear, these claims have a strong legal foundation, particularly in the Seventh Circuit, even after an Attorney General decision attempted to undermine them. 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.*

**10. S. is a woman from Guatemala. Her son, P., is a derivative on her application. S. and P. speak Spanish and live in Chicago, IL. (19-0133929) (19-0133931)**

S.'s husband abused her physically and emotionally for years in Guatemala. On multiple occasions, S.'s husband tried to kill her while he was beating her. S. tried to leave her husband in 2017, and she and P. moved in with a friend. Only a few months later, S.'s husband entered the home where S. was living and attacked her. He continued to threaten S. whenever he saw her in town, once firing a gun into the air to scare her. When P. tried to defend S., his father pointed

a gun at him and threatened his life. S. reported her husband's threats to the police, but he was only detained for a week and then released back into the community. S. learned that her husband hired someone to kill her after he was released from jail. S. fled to the United States with P. in 2018. Although S. and P. were issued Notices to Appear (NTAs) when they entered the United States, the Department of Homeland Security (DHS) has not yet filed their NTAs with the immigration court. Unless and until their NTAs are filed with the immigration court, USCIS must receive S.'s skeletal application for asylum by February 8, 2020. All affidavits and supporting materials to her case will be due one week prior to her interview at the asylum office, which will likely occur 4-6 weeks after the date of filing.

***11. K. is a woman from Honduras. K.'s daughter, M., is independently eligible for asylum. K.'s first Master Calendar hearing is September 19, 2019. M. entered the United States as an unaccompanied immigrant child and her Notice to Appear has not yet been filed with the immigration court. K. and M. speak Spanish and live in Chicago. (19-0134872) (19-0134871)***

K.'s former partner, D., threatened and abused her for many years. Afraid to leave him even though she had tried to end the relationship, K. continued living with D. while pursuing a new relationship. K.'s new partner was also abusive, and he threatened to kill K. if she did not move out of the house she shared with D. and their daughter, M. K.'s new partner began to beat her, and on one occasion, he put a knife to her throat. Fearing further abuse, K. fled to the United States in 2012 and left her daughter M. in D.'s care. After K. left, D. began to physically and sexually abuse M. He beat, raped, threatened, and tried to kidnap M. Fearing for her life, M. fled to the United States, as well. Although the Department of Homeland Security (DHS) issued M. a Notice to Appear (NTA) when she entered the United States, DHS has not yet filed the NTA with the immigration court. Unless and until DHS files her NTA with the court, M.'s *pro bono* attorneys should plan to file her skeletal application for asylum with USCIS by January 22, 2020. Although K. was apprehended by immigration in 2012 and passed a credible fear interview at that time, her NTA was not filed with the immigration court until 2018. NIJC filed K.'s application for asylum with the Immigration Court. Because this application was filed more than one year after K. entered the United States, her *pro bono* attorneys will need to argue that K. merits an exception to the one-year filing deadline for asylum. NIJC will assist them in making this argument and K. is otherwise eligible for withholding of removal and Convention Against Torture relief. All affidavits and supporting materials to K.'s case will be due 15 days prior to her merits hearing, which has not yet been scheduled.

***12. T. is a woman from El Salvador. T.'s merits hearing is on September 28, 2020. T. speaks Spanish and lives in Northcentral Indiana. (16-0104988)***

T. lived with her grandmother, uncle and cousins since she was an infant. T.'s uncle physically and verbally abused T., her grandmother, and his children throughout T.'s childhood. When T. was 15 years old, a gang member raped her, threatening to kill T. and her family if she ever reported the rape to the police. Shortly thereafter, T. moved out of her grandmother's house to escape the abuse, but her uncle continued to harass and threaten her. In 2013, the man who raped T. moved into her apartment complex and approached T. on several occasions. Fearing that he might rape her again or kill her, T. fled El Salvador in 2013. NIJC filed T.'s skeletal

asylum application with the immigration court in April 2016. Because T.'s application was filed more than one year after she entered the United States, T.'s *pro bono* attorneys will need to argue that she merits an exception to the one-year filing deadline for asylum, likely based on the ongoing effects of the significant trauma she suffered in El Salvador. NIJC will assist her attorneys in making this argument. All affidavits and supporting materials to T.'s case will be due 15 days prior to her merits hearing in 2020.

***13. G. is a woman from Mexico. Her merits hearing is on March 16, 2021. G. speaks Spanish and lives in Chicago, IL. (16-0109893)***

G.'s ex-partner abused her and a criminal organization forced G. to pay a tax on her clothing store. When the organization's leader was arrested, the new leader doubled the tax and G. was unable to pay. The organization visited G.'s store three times. First, they told her the new rules. The second time they tried to rob her. The third time they threatened her life. They said they would kidnap or kill her if she did not pay the tax. The same organization murdered G.'s brother-in-law for not paying the tax and said the same would happen to G. if she did not pay. G. tried to report the extortion and threats to her mayor, but the mayor said he could not protect her. G. fled to the United States with three of her four children, who are all U.S. citizens. After she left, the organization went looking for G. and beat up her brother, causing her oldest child to flee to the United States as well. NIJC timely filed G.'s asylum application with the immigration court. Her attorneys will have to prepare G.'s affidavit and other supporting documents before her merits hearing in 2021. G. has a 2004 firearms conviction that will not bar her from asylum, but will need to be addressed for purposes of the judge's discretionary decision.

***14. S. is a woman from Swaziland. Her daughter and son will be derivatives on her application. Their merits hearing is 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 frequently sexually abused her. S.'s husband 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. NIJC timely filed S.'s asylum application with the immigration court. All affidavits and supporting materials will be due 15 days prior to S.'s merits hearing in 2021.

***15. Y. is a woman from Honduras. Her daughter, Z. is a citizen of Honduras and Mexico.***



***Their merits hearing is on July 8, 2021. Y. and Z. speak Spanish and live in Chicago, IL. (16-0111109), (16-0111478)***

Y.'s ex-partner abused her for nearly a decade. He would regularly beat her, rape her, stalk her, and threaten her. Y. fled to the United States in 2012 to escape his abuse, but did not have an attorney and was deported. When she returned, her ex-partner continued to attack, rape, and threaten her. She called the police to report him, but they never responded. In 2014, Y. again fled to the United States, but was deported due to her prior removal order. Y. returned to Honduras, where her ex-partner continued to harm her. The Mara 18 gang also started extorting her clothing business after she stopped her sister from dating a gang member. The gang demanded money, tried to recruit her, and threatened to kill her if she did not make the payments. Once, a gang member put a knife to her chest and cut her. Y. moved to another city, but the gang continued search for her. Y. contacted a smuggler who promised to help her escape to the United States, but once in Mexico, he turned her over to a cartel. The cartel held her for a year, sex trafficking her near the U.S. border until she became pregnant with a cartel leader's baby, her daughter Z. Shortly after Z.'s birth, Y. managed to escape, crossed the river into the United States, and asked for help. Z.'s father continued to send Y. threatening text messages, promising to kill Y., Z., and their family in Honduras. Because she has a prior removal order, Y. is currently only eligible for withholding of removal and relief under the Convention Against Torture. Her daughter, Z., is eligible for asylum, although their attorneys will need to argue that Z. merits asylum from both Honduras and Mexico. NIJC timely filed Y. and Z.'s asylum applications. Their attorneys will need to prepare affidavits and other supporting materials before their merits hearing in 2021.

***16. O. is a woman from Guatemala. Her son, C., is a derivative on her application for asylum. Her merits hearing is April 7, 2022. O. and C. speak Spanish and live in Chicago, Illinois. (18-0122794) (18-0122902)***

O.'s partner R. became abusive after she gave birth to their daughter. He would insult her, beat her, rape her, threaten to kill her, and forbid her from leaving the house. O. once reported R.'s abuse to the Guatemalan police, but R. threatened to kill O. and the children until she withdrew her report. After R. gave the police information about crimes committed by a criminal organization, the group began threatening R., O., and their children. The Guatemalan government put the family in a witness protection program, but the group still tracked them down, shot their home, and murdered R.'s cousin while looking for R. Fearing the group and R.'s continued abuse, O. fled to the United States with her infant son. R. followed a few months after, but was deported to Guatemala. He continues to threaten O. from afar. NIJC filed O.'s application for asylum with the immigration court more than one year after she entered the United States. NIJC will assist her *pro bono* attorneys in arguing that O. merits an exception to the one-year filing deadline. All affidavits and supporting materials to O.'s case will be due 15 days prior to her merits hearing in 2022.

***17. R. is a woman from Guatemala. Her two children, G. and T., will be derivatives on her asylum application. Her merits hearing is July 21, 2022. R. speaks Chuj and Spanish and lives in Southern Indiana. (17-0121318), (17-0121553), (17-0121552)***

R. married her husband when she was around 14 years old. Shortly after their marriage, R.'s husband began abusing her. He and his mother insulted her, threatened her, and beat her. Her husband controlled her and tried to force her to miscarry. When R.'s husband went to the United States, his mother continued to physically abuse R. until R. moved out of the house. During this time, R.'s father-in-law attempted to rape her and R. learned that her son has serious heart problems. R.'s husband was deported back to Guatemala, where he continued to beat her, attempted to kill her, and tried to kidnap her daughter. When R. tried to escape his abuse, he threatened her life, and R.'s family and community did not support her in leaving her marriage. Fearing for her life, R. fled to the United States. NIJC timely filed R.'s application for asylum with the immigration court. All affidavits and supporting materials for R.'s case will be due prior to her merits hearing in 2022.

***18. N. is a woman from Guatemala. N.'s daughter, F., will be a derivative on her application for asylum. N.'s merits hearing is August 29, 2022. N. and F. speak Kanjobal and live in Chicago. NIJC will assist her attorneys in identifying an interpreter. (18-0129734) (18-0130545)***

After N. married her husband, she moved in with his family and was frequently left alone with them for long periods of time while he was away for work. The family insulted N., and frequently prevented her from leaving the house. In 2015 while N. was alone in the home, her brother-in-law broke in and raped her. Afterwards, he told her that he would kill her and her family if she reported him to the police. Initially, N. kept the rape a secret, fearing repercussions from her brother-in-law and the possibility that local authorities might not listen to or believe her because she only spoke an indigenous language. N. became depressed and increasingly fearful of her husband's family. When she finally disclosed the rape to her husband, he assisted her in reporting the crime to the police. However, the police did not punish N.'s rapist or offer her any protection, even though N.'s brother-in-law continued to make threats against N. and her family to other members of the community. Fearing for her life, N. fled to the United States with F. in 2017. NIJC filed N. and F.'s applications for asylum with the immigration court more than one year after they entered the United States. N.'s *pro bono* attorneys will need to and argue that she merit an exception to the one-year filing deadline. NIJC will assist them in making that argument. All affidavits and supporting documents to N.'s case will be due 15 days prior to her merits hearing in 2022.

***19. Q. is a woman from Honduras. Her son, Y., will be a derivative on her application. Q. and Y.'s merits hearing is November 9, 2022. Q. speaks Spanish and lives in Northcentral Indiana. (18-0129057) (18-0129269)***

Q.'s father physically abused Q. and her mother during Q.'s childhood. When Q. was 14 years old, she met a partner, D., who was eight years older than she was. She moved in with his family and soon after, D. began abusing Q. physically, sexually, psychologically and verbally. D.'s family also abused Q. and treated her like a servant. Q. became pregnant at 16. One of D.'s family members also repeatedly sexually molested Q., but she did not report it for fear D. would retaliate against her. After Q.'s son, Y., was born, D.'s family threatened to take Y. from her if she ever tried to leave. Before fleeing to the United States, Q. tried to escape with Y. but D.'s family threatened to take Y. and told Q. she would eventually have to return because she is D.'s

woman and her place is in their house. Fearing she would never be safe from D. or his family if she stayed, Q. fled Honduras and entered the United States in April 2018. NIJC timely filed Q.'s skeletal application for asylum with the immigration court. All affidavits and supporting materials to her case will be due 15 days prior to her merits hearing in 2022.

***20. P. is a woman from Honduras. Her children A., J., and E. will be included as derivatives on her application. P.'s merits hearing is January 17, 2023. P. and her children speak Spanish and live in Southcentral Wisconsin. (18-0128597) (18-0128605)***

P. grew up in a poor family in rural Honduras, where she was unable to attend school because she had to work to help support her family. When she was around 14 years old, she entered a relationship with a much older man, T., in order to be able to leave her home and alleviate the burden on her mother. Soon after entering the relationship, P. learned that T. was an alcoholic and a drug addict. After the birth of their children, P. told T. that his behavior was not good for the babies. T. became very angry and started to beat P. He often verbally abused her and choked her with his belt, calling her stupid and threatening to kill her if she ever tried to leave him. While she was pregnant with their third child, T. hit her multiple times on the stomach, and P. ran away in order to protect the baby. T. followed P. and the children to their new home and tried to break in on multiple occasions by breaking down the door. One of these times, P. reported him to the police for property damage because she believed that would get the police to respond even if the abuse would not. The police arrested T, but quickly released him. After T. continued to threaten her, and P. saw that the police were unwilling to protect her, she fled to the United States. NIJC timely filed P.'s application for asylum with the immigration court. All affidavits and supporting materials will be due 15 days prior to her merits hearing in 2023.

***21. D. is a woman from Mongolia. Her husband, J., is a derivative on her application for asylum. She speaks Mongolian and lives in Chicago, IL. NIJC will assist her attorneys in identifying an interpreter. (17-0116073)***

D. 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 D. soon became financially dependent upon E. About five months after the couple moved in together, E. began to abuse D. verbally and physically. He tried to control her behavior, demanded she do what he told her, and kicked and beat her. In 2013, when D.'s brother witnessed E. punching D. in the face, he was able to get the police to come to the house and arrest E., something that D. believes was only possible because her brother was a man. D. 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, D. told a coworker about the abuse and was urged to flee to the United States in order to escape the relationship. D. surreptitiously applied for a visa, which was granted, and entered the United States in 2016 without telling E. Later, D. 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 D.'s application for asylum in May 2017. Affidavits and other supporting documents will be due one week prior to her interview at the asylum office. The interview timeline for applications filed

before 2018 is uncertain. Please review the asylum office scheduling update at <http://immigrantjustice.org/policy/blog> for more information.

***22. 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 started a new family and abandoned K. and her mother. L.'s father is in El Salvador and does not support L financially or otherwise. 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, members of the Mara 18 gang started sexually harassing K. and telling her to be with them. K. refused to be a gang girlfriend and the gang soon began threatening her and her entire family. During one incident, a gang member tried to molest her at knifepoint. Fearing for her life, K. fled to the United States with her very young 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. NIJC filed K. and L.'s skeletal applications for asylum with USCIS. Although K. and L. missed their one-year filing deadline, they qualify for an exception to the deadline, and NIJC will assist them in making that argument. K. and L.'s affidavits and supporting documents will be due one week prior to their interview at the asylum office. The interview timeline for their case is uncertain.

**Asylum: 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.*

***23. V. is a man from Burma. V. speaks Burmese and Rohingya and lives in Chicago, IL. (19-0134141)***

V. is a Rohingya Muslim man from Burma. While studying at a local Islamic school, V. was insulted and harassed frequently by men who he believed were members of a Burmese nationalist group. V. was eventually forced to withdraw from Islamic school due to this harassment, and he had to stop wearing traditional Islamic dress in public. V. tried to make a living driving a taxi, but he was attacked and threatened on multiple occasions by passengers who insulted his religion. In 2017, V. opened a textile store. V. had to drive across Burma to purchase the products for his store, passing through military checkpoints along the way. Police and soldiers at these checkpoints frequently threatened and beat V., telling him that Burma was “not his country.” The police and soldiers began to extort V., telling him that they would harm him or not allow him to pass through the checkpoints if he did not pay them. On one occasion,

when V. was unable to pay the fee they demanded, they dragged him from his car and beat him with tree branches, breaking his hand. V. believes that he was followed after this incident, and his store was broken into and destroyed multiple times. Fearing further attacks against his life, V. fled to the United States in 2019. USCIS must receive his skeletal application for asylum by April 4, 2020, but his attorneys should file the application earlier if possible. All affidavits and supporting materials to V.'s case will be due one week prior to his interview at the asylum office, which will likely occur 4-6 weeks after the date of filing.

***24. E. is a woman from Mexico who is seeking asylum with her mother, O., her adult daughter, J., and J.'s son, H., who will be a derivative on J.'s application. J.'s next Master Calendar Hearing is September 18, 2019. E.'s next Master Calendar Hearing is July 09, 2020. O.'s next Master Calendar Hearing is February 26, 2020. E., O., J., and H. speak Spanish and live in Chicago. (19-0132005)(19-0132459)(19-0132536)(19-0132566)***

Members of a cartel murdered E.'s brother while he was with E.'s son S. During the wake for E.'s brother, cartel members stormed into O.'s house and opened fire on the crowd gathered to pay their respects. The cartel members killed E.'s son and O.'s partner, along with several others. E.'s daughter, J., recognized three of the shooters. J. collaborated with local law enforcement officers to identify the shooters. While J. reported the crime, cartel members invaded her home and opened fire. Fearing for their lives, E., O, J., and H. fled to a nearby state. After they fled, cartel members stalked J. and threatened to kill her and her entire family if she did not stop the investigation. In early 2018, local officials warned J. that they could not protect her or her family. They advised E., J., O., and H. to flee the country to avoid being killed by the cartel members. NIJC timely filed E., O., J. and H.'s applications for asylum. All affidavits and supporting documentation to E. and J.'s cases will be due 15 days prior to their merits hearing, which has not yet been scheduled.

***25. K. is a young woman from Honduras. Her first non-detained Master Calendar hearing has not yet been scheduled. She speaks Spanish and lives in a northwest suburb of Chicago. (18-0128269)***

Gang members assaulted and threatened K. in Honduras. Some of the threats from the gang members were sexual in nature. K.'s brother also resisted gang recruitment, leading to increased threats to K.'s brother, K., and their family members. Separately, K.'s mother was in an abusive relationship in Honduras, and her partner also severely emotionally abused K. Fearing for her life, K. fled to the United States and was designated as an unaccompanied immigrant child. NIJC timely filed her application for asylum with USCIS before K. was put into removal proceedings. Now that K.'s NTA has been filed with the Chicago Immigration Court, USCIS no longer has jurisdiction over her asylum application. Her affidavit and supporting documents will be due prior to her merits hearing, which has not yet been scheduled.

***26. K. is a woman from El Salvador. Her daughters R., D., W., and V., will be derivatives on her application for asylum and are each independently eligible for asylum. Their next Master Calendar Hearing is September 18, 2019. K. and her daughters speak Spanish and live in Chicago, IL. (18-0130771) (18-0130926) (18-0130927) (18-***

**0130928) (18-0130929)**

A member of the Mara Salvatrucha (MS-13) murdered K.'s father in El Salvador after the gang demanded that the family abandon their home so it could be used by MS-13. At the time of her father's death, K. had recently separated from her abusive partner, a Salvadoran police officer. K. fled to Guatemala with her children, but the same gang member who murdered her father found K. in Guatemala and informed her that her father's debt to the gang had been passed on to her. In an attempt to avoid further interactions with this gang member, K. subsequently relocated to the border between Guatemala and Mexico, where her two youngest daughters were born. In early 2018, the same gang member who had previously threatened K. found her again in Mexico with her daughters. He threatened that he had been watching K. and her daughters, and that he wanted to marry one of her daughters as a way to resolve her debt. Shortly after, two men assaulted and raped K.'s daughter R., and told her that the rape had been ordered by the gang member who had threatened her mother. Fearing for their lives, K. and her daughters fled to the United States in May 2018. NIJC filed their applications for asylum with the immigration court. All affidavits and supporting documentation to their cases will be due 15 days prior to their merits hearing, which has not yet been scheduled.

***27. Y. is a woman from Guatemala. Her two children, R. and E., will be derivatives on her asylum application. Her next Master Calendar Hearing is September 19, 2019. Y. and her children speak Spanish and live in Northeast Indiana. (19-0132139) (19-0132469) (19-0132470)***

As a young girl, Y. suffered physical and emotional abuse at the hands of her aunt, and then later by multiple domestic partners. At 13 years old, Y. moved in with her first partner. He began abusing her at age 17, after she gave birth to her first child, and then abused her for over six years. A second domestic partner began abusing Y. in approximately 2015. This partner was a member of the Mara Salvatrucha (MS) gang and he physically and sexually abused Y. in front of her children for almost three years and threatened them all with death multiple times. Y. fled Guatemala in October 2018 with her two children and travelled with a caravan of refugees for safety. NIJC timely filed Y.'s application for asylum with the Immigration Court. All affidavits and supporting materials to Y.'s case will be due 15 days prior to her merits hearing, which has not yet been scheduled.

***28. R. is a woman from Mexico. R.'s two children, M. and O., will be derivatives on her application for asylum. R. next Master Calendar Hearing is September 25, 2019. R. lives in northern Illinois and speaks Spanish. (18-0128852) (18-0131087) (18-0131088)***

R.'s problems began when her husband's nephews joined a local drug cartel. These nephews began to extort R. and her husband, demanding that they pay 'rent' every week for their small food stand. In early 2018, R. and her husband could no longer afford to pay the cartel and started receiving verbal threats. R. believes that her husband's nephews reported on her family's inability to pay to the rest of the cartel. R. knows that these same nephews participated in the fake kidnapping of another family member as a punishment for failure to pay extortion demands. Because R. and her family lived on a plot of land directly next to the home of the nephews, she believed that she could not protect her daughters from the cartel if they decided to

through on their threats. Wanting to protect her children, R. fled to the United States with M. and O. NIJC timely filed R.'s skeletal application for asylum with the immigration court. All affidavits and supporting materials to R.'s case will be due 15 days prior to her merits hearing, which has not yet been scheduled.

***29. P. is a man from Honduras. P.'s daughter, E., is independently eligible for asylum and will also be a derivative on P.'s application. P.'s next Master Calendar Hearing is October 17, 2019. P. and E. speak Spanish and live in Indianapolis, Indiana. (18-0129641) (18-0130209)***

Members of the Mara Salvatrucha (MS) gang started pursuing P.'s young daughter, E., when she was around 11 years old. The gang members would follow E. home from school and threaten her and try to force her to be a gang girlfriend. When E. refused, the gang members told her that they were going to kill her family if she did not comply. When P. learned that gang members had been harassing and threatening his daughter, he confronted them and demanded that they leave E. alone. The gang members then told P. that they if he tried to stop them, that he would be killed as well. Fearing for his life and wanting to protect his daughter from being taken by the gang, P. fled to the United States with E. in 2018. After crossing the border, P. and E. were separated and detained in different locations for nearly three months before being reunited. NIJC timely filed P.'s skeletal application for asylum with the immigration court. All affidavits and supporting materials to P.'s case will be due 15 days before his merits hearing, which has not yet been scheduled. E.'s Notice to Appear (NTA) has not yet been filed with the immigration court. Unless and until her NTA is filed, USCIS will retain initial jurisdiction over her application for asylum. NIJC timely filed E.'s skeletal application for asylum with the immigration court. All affidavits and supporting materials to E.'s case will be due one week before her interview at the asylum office. The timeline for that interview is uncertain. If E.'s NTA is filed will the immigration court, her *pro bono* attorneys should request to consolidate her case with her father's prior to his merits hearing.

***30. J. is a young man from Nicaragua. J. next Master Calendar hearing is on October 22, 2019. J. speaks Spanish and lives in Indianapolis, IN. (19-0132999)***

J. and his family actively oppose the Sandinista government. J.'s family members participated in several anti-Ortega protests in Nicaragua in 2018. After J.'s uncle participated in one protest, the police threatened to kill him if he participated in another. Fearing for his life, he fled to another part of Nicaragua with his wife and children. Soon after, the police arrested another of J.'s uncles because of his anti-Ortega opinion. Afraid of retaliation for expressing their political opinions, the rest of J.'s family has since stopped protesting. J. fears that, if forced to return to Nicaragua, he would be associated with his anti-Ortega family members and arrested or killed. NIJC filed J.'s asylum application with the immigration court. Because J.'s application for asylum was filed more than one year after he entered the United States, his *pro bono* attorneys will have to argue that he merits an exception to the one-year filing deadline for asylum eligibility, primarily related to the changed in conditions in Nicaragua. NIJC will assist J.'s attorneys in making this argument. All affidavits and supporting materials for J.'s case will be due 15 days prior to his merits hearing, which has not yet been scheduled.

**31. A. is a man from Honduras. His daughter, T., will be a derivative on his application for asylum. A.'s next Master Calendar Hearing is October 23, 2019. He speaks Spanish and lives in a northwest suburb of Chicago. (18-0131295)**

Several years ago, members of the Mara 18 (M-18) murdered A.'s brother. A witness to the murder gave A. information regarding the identities of the perpetrators and A. passed this information along to the local police. Later, members of the M-18 killed the witness and started following A. A. received a death threat on his phone from one of the gang members he believes was involved in his brother's murder. Shortly after, several gang members tried to ambush A. on his way home from work and shot at him multiple times, wounding A.'s arm. Fearing for his life, A. fled to the United States with his daughter. Members of the M-18 continue to look for A. in Honduras. NIJC timely filed A.'s skeletal application for asylum with the immigration court. All affidavits and supporting materials to A.'s case will be due 15 days prior to his merits hearing, which has not yet been scheduled.

**32. D. is a woman from Togo. Her next Master Calendar Hearing is January 22, 2020. Although she is proficient in French, she will require a Mina interpreter to prepare her affidavit. NIJC will assist her attorneys in identifying an interpreter. She lives in Chicago, IL. (18-0123400)**

D. was a member of an opposition political party in Togo and frequently participated in protests against the ruling government. In 2013, government officials set fire to the marketplace where D. worked, and blamed it on members of her political party. Shortly after, officials arrested and interrogated D., pressuring her to say that members of her party had planned the fire. D. refused, so officials detained and tortured her, along with a group of other female members of her party. At the time of her arrest, D. was pregnant and the frequent beatings caused her to miscarry the baby. Afterwards, the guards sent her to a nearby hospital, from which D. was able to escape. She continued organizing with her party in secret, but eventually she was discovered by the police and arrested. D. was tortured again, including severe strangulation. Eventually she was released to the hospital and soon after, she fled to the United States. D. filed a timely, *pro se* application for asylum with USCIS, but they referred her case to the immigration court. D.'s *pro bono* attorneys will need to supplement her original, *pro se* filing with an affidavit and other supporting documents, all of which will be due 15 days prior to D.'s merits hearing, which has not yet been scheduled.

**33. R. is a young man from Honduras. R.'s next Master Calendar hearing is February 26, 2020. R. speaks Spanish and lives in North Central Indiana. (19-0133298)**

R. grew up in Honduras. In 2010 his uncle was elected to the local government. One of his uncle's supporters, F., was a national congressman. F. was also a well-known drug trafficker who worked with the Sinaloa Cartel in Mexico. When F. ran for reelection in 2017, R. met F. at a campaign event, and F. asked R. to come work for him. After R. refused, he was approached several more times over the next six months for the same purpose. In 2018, R. was forced into a car by some of F.'s men, who tortured R. and told him that he needed to transport drugs in Honduras for them or they would kill him. R. refused, and after several more hours of torture, the men let R. go telling him they would be back soon for his decision. The next day, R. went to report the incident to the police, but they refused to take the



report. Fearing further repercussions, R. fled to the United States. The immigration court must receive R.'s skeletal application for asylum by October 24, 2019. All affidavits and supporting materials to R.'s case will be due 15 days before his merits hearing, which has not yet been scheduled.

***34. U. is a young man from Guatemala. U.'s next Master Calendar hearing is on May 28, 2020. U. speaks Spanish and lives in a western suburb of Chicago, IL. (18-0127989)***

In 2016, a gang began threatening and physically assaulting U. on his way to and from school every day. The gang members demanded that U. join their gang, and on multiple occasions, they beat him badly for refusing. U. still has a scar on his leg as a result of one of the beatings. The last time that the gang members confronted U., they told him that he had to join their gang or they would go to his house and kill all of his relatives. Fearing for his life, U. fled to the United States. NIJC timely filed U.'s skeletal application for asylum with the immigration court. All affidavits and supporting materials to U.'s case will be due 15 days prior to his merits hearing, which has not yet been scheduled.

***35. M. is a woman from Cuba. M. speaks Spanish and lives in Chicago, IL. (19-0135829)***

M. openly opposed the Castro regime in Cuba, despite the fact that her father worked for the government and had participated in the communist revolution there. Police patrolled her home for multiple days at a time, and would frequently confront her and accuse her of plotting against the government. On one occasion, they attempted to force M. to register as a member of the youth wing of the national communist party, and when she refused, a complaint was filed against her and she was fired from her job. M. then started her own small business, but police would frequently confront her and accuse the business of being illegal. M. was arrested and detained multiple times with no explanation, and police opened an investigation into her anti-communist political opinion. Around the same time, M.'s father told her that she was an embarrassment to him for not supporting Castro and that he preferred that she be jailed in order to 'fix' her political beliefs. When a police officer confiscated materials out of her store and refused to return them, M. reported the police officer to his superiors. The police officer then threatened M. and tried to force her to withdraw the complaint. Fearing further attacks from the police, M. fled to the United States in 2019. Although M. was issued a Notice to Appear (NTA) by the Department of Homeland Security (DHS) when she entered the United States, her NTA has not yet been filed with the Immigration Court. Unless and until her NTA is filed, USCIS has initial jurisdiction over her application for asylum. USCIS must receive M.'s skeletal application for asylum by April 11, 2020. All affidavits and supporting materials to M.'s case will be due one week prior to her interview at the asylum office, which will likely occur 4-6 weeks after the date of filing.

***36. C. is a woman from El Salvador. Her daughters V. and G. are derivatives on her application for asylum. Her merits hearing is September 16, 2020. C. and her daughters speak Spanish and live in central Indiana. (17-0119773) (17-0120094) (17-0120093)***

Since C. was a little girl, the Mara Salvatrucha (MS) gang has had strict control over her community in El Salvador. When C.'s husband tried to start his own business cultivating honey in the nearby mountains, gang members began extorting C. and her family for a portion of his

profits. During the same period, MS members attempted to forcibly recruit C.'s brother into the gang, and made threats against his entire family, including C., when he refused. Eventually, C. and her husband could no longer afford the extortion payments to the gang. Threats dramatically escalated as gang members began to threaten to kill C. and her family for lack of payment. One day, one of the leaders of the gang came to C.'s home and told her that she and her family had to leave immediately because they were taking the house from them to make up for their missed extortion payments. C.'s husband reported the threats to the local police, but no investigation or any protection against the gang resulted. Fearing for their lives, C. and her family fled to the United States in 2017. NIJC timely filed C.'s application for asylum, with V. and G. included as derivatives, with the immigration court. All affidavits and supporting materials to C.'s case will be due 15 days prior her merits hearing in 2020.

***37. H. is a woman from Cameroon. H.'s merits hearing is October 26, 2020. H. speaks English and lives in Chicago, IL. (19-0134073)***

H.'s father was actively involved in the Anglophone separatist movement in Cameroon. After H. participated in a march for the independence of the Anglophone state in 2017, Francophone police arrested her, beat her, and detained her in inhumane prison conditions. H.'s father bribed an officer for H.'s release. Several months later, a group of police officers barged into H.'s house, raped H. and her sister, and killed H.'s brothers, sister, father, and grandmother in front of her. Police officers demanded that H. give them her father's documents and threatened to kill her if she did not comply. H. managed to escape from the police officers and fled to another town. Fearing for her life, H. later fled the country with the help of two friends. After H. fled, the two women who helped her escape were killed. H. timely filed her *pro se* application for asylum with the immigration court. All affidavits and supporting materials for H.'s case will be due 15 days prior to her merits hearing in 2020.

***38. Z. is a man from Honduras. His two daughters, C. and D., will be derivatives on his asylum application and independently qualify for asylum. Their merits hearing is April 5, 2021. Z. and his daughters speak Spanish and live in Indianapolis, IN. (18-0123478) (18-0125746) (18-0125747)***

The Mara Salvatrucha (MS) gang murdered Z.'s son for refusing to join. When Z. identified his son's body at the morgue, the police questioned him about the murder. Z. told the police the MS-13 had killed his son. Soon after, MS began to threaten Z. over the phone, telling him they would harm or kill Z. and his other children because Z. talked to the police. Strangers also came to Z.'s house to look for him. Later, a man raped Z.'s stepdaughter. Z. investigated the rape and reported it to the police. After the rapist was captured, Z. filed a report with the prosecutor. Z.'s stepdaughter identified the rapist in a lineup and he went to jail. Z. then began receiving threatening calls referencing this incident. Fearing the callers would act on their death threats, Z. and his family fled to the United States in 2016. NIJC filed applications for asylum with the immigration court for Z., C., and D. Their *pro bono* attorneys will need to argue that Z. merits an exception to the one-year filing deadline, and NIJC will assist them in making that argument. All affidavits and supporting documentation to Z.'s case will be due 15 days prior to his merits hearing in 2021.

**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. live in Champaign, IL. Although T. speaks some Spanish, their primary language is Kanjobal and will need an interpreter in that language. NIJC will assist their attorneys in identifying 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 did not leave the country. Fearing for their lives, R. and T. fled to the United States. NIJC timely filed R. and T.'s I-589 applications for asylum with the immigration court. Their *pro bono* attorneys will need to prepare affidavits and other supporting documents prior to their merits hearing.

**40. K. is a young man from Vietnam. K.'s merits hearing is July 21, 2021. K. speaks Vietnamese and lives in a suburb of Milwaukee, Wisconsin. (18-0125360)**

In 2017, K attended a protest denouncing a Chinese steel company for a toxic waste spill at their factory in Vietnam that damaged local marine life. Police arrived and began to violently quash the protest. Police assaulted and detained K. along with many other protestors. Officers then interrogated K. and threatened to detain him indefinitely. During his detention and interrogation, the police officers beat and threatened K. stating that they would indefinitely detain him. The police officers released K., but he was later summoned to appear for further interrogation. K. did not attend this interrogation out of fear for his safety, and instead fled to the United States to seek asylum. NIJC timely filed K.'s application for asylum with the Chicago Immigration Court. All affidavits and supporting documents for K.'s case will be due 15 days prior to his merits hearing in 2021.

**41. L. is a man from Mexico. His merits hearing is August 8, 2021. 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 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 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 do not bar L. from receiving asylum, but will need to be addressed for purposes of the judge's discretionary decision. NIJC timely filed L.'s I-589 application for asylum with the immigration court. L.'s affidavit and other supporting documents will be due 15 days prior to his merits hearing in 2021.

**42. B. and T. are a husband and wife from Mexico. Their children, A. and E., are derivatives on their applications. Their merits hearing is on October 26, 2021. B. and T. speak Spanish and live a western suburb of Chicago. (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 skeletal applications for asylum with the immigration court. All affidavits and supporting materials to their case will be due 15 days prior to their merits hearing.

**43. B. is a woman from Mexico. Her two sons, S. and A., will be derivatives on her asylum application. Their merits hearing is on April 12, 2022. L. is B.'s young grandson. Because he was designated an unaccompanied immigrant child, USCIS has initial jurisdiction over his asylum application, even though he is in removal proceedings. L.'s next Master Calendar Hearing is September 3, 2019. M. is B.'s oldest son. Because he entered separately from his family and is not in removal proceedings, USCIS has initial jurisdiction over his asylum application. B., her sons, and grandson speak Spanish and live in central Wisconsin. (18-0128550) (18-0128674) (18-0128678) (18-0129157)**

The fathers of all of B.'s five children were physically and verbally abusive, and by the time she was an adult she was forced to relocate to a different part of Mexico in order to get away from them, even though it meant raising all of her children on her own. She also cared for her grandson L., who thought of his uncles – B.'s teenage sons – as his brothers. In about 2014, when B.'s oldest son, M., turned 17, cartel members forcibly recruited him to work for them. M. resisted, and the cartel members so brutally assaulted him they thought they had killed him. Shortly after, M. fled to the United States to escape the cartel. When B.'s son S. turned 17 in late 2017, he faced the same fate as his older brother and began to be forcibly recruited to work for the cartel. They told S. that they would kill his mother if he refused to work for them. When S. refused to work for them, cartel members would break into their home and grab him in front of B. and the rest of his family. L. would hide under the bed and shut his eyes as he heard his

uncles scream. Fearing for S.'s life, B. decided to flee to the United States with S., A., and L., but because L. was B.'s grandson and not her biological child, he was separated from her at the border. NIJC timely filed B.'s application for asylum with the immigration court. All affidavits and supporting materials to her case will be due 15 days prior to her merits hearing in 2022. Although L.'s case is based on the same facts, his asylum application must be filed first with USCIS and NIJC has timely filed his skeletal application for asylum. Because M.'s one-year deadline to apply for asylum has passed, USCIS must receive his skeletal application for asylum as soon as possible. All affidavits and supporting documents to L. and M.'s cases will be due one week prior to their interviews at the asylum office. The interview timeline for his interview is uncertain, but may occur within 4 to 6 weeks of filing.

***44. L. is a man from Guatemala. L.'s merits hearing is April 26, 2022. L. speaks Spanish and lives in Bloomington, IL. (14-0088061)***

When L. was about 14 years old, the M-18 gang began to forcibly recruit him. They threatened to kill his family if he did not join them and beat him when he refused to comply with their demands. For several years, the M-18 gang waited for him outside of his school and, on occasion, beat him so severely he fell unconscious. L. repeatedly told the gang he would not join them, but they continued to threaten and assault him. In August 2013, a gang member saw N. on the street and tried to hit him. His companion told him to stop, but the next day, the gang member went to N.'s home, flashed his gun, and told N. to leave by morning or he would kill him. L. left Guatemala immediately and entered the United States on about August 5, 2013. He was apprehended by immigration officers and released from custody after he passed a credible fear interview. NIJC timely filed L.'s asylum application with the immigration court. All affidavits and supporting materials to L.'s case will be due 15 days prior to his merits hearing in 2022.

***45. H. is a woman from Honduras. Her sons, D. and X., will be derivatives on her application for asylum. Her merits hearing is September 6, 2022. H. speaks Spanish and lives in Northcentral Indiana (19-0131662) (19-0131917) (19-0132201)***

Growing up, H.'s father regularly abused her. Later in life, H.'s half-brother, P., became a high-ranking member of the Mara Salvatrucha (MS-13) gang in Honduras. One day P. showed up at H.'s house demanding she hide him from the police. When she refused, P. threatened to kill her and her son if she told the police he had been there. He left and the police later arrested him. He is now in jail for kidnapping, extortion, and murder. After P.'s arrest, his fellow MS-13 gang members found H. and demanded she repay P.'s financial debt to them. The armed gang members gave H. 24 hours to make the payment or they would kill her. P. fled with her son to her mother's house that same day. She lived in hiding in rural Honduras, moving around to avoid recognition, until she fled to the United States with D. in 2018. Her younger son, X., entered the United States a few months later. Although X. was issued a Notice to Appear (NTA) when he entered the United States, the Department of Homeland Security (DHS) has not yet filed his NTA with the immigration court. Once X.'s NTA is filed, his *pro bono* attorneys should plan to consolidate his case before the court with H.'s. NIJC timely filed H.'s application for asylum with the immigration court. All affidavits and supporting materials for H.'s case will be due prior to her merits hearing in 2022.

**46. Z. is a man from Republic of Congo. Z.'s merits hearing is November 21, 2022. Z. speaks French and lives in Chicago, IL. (18-0126661)**

In March 2012, there was a massive explosion at a Congolese military arms depot. Z.'s parents were among the casualties of the explosion. When the government promised to compensate the families of the victims, Z. filed the paperwork to obtain the compensation for his family, but never received the money. Z. believes that the government discriminated against him because of his ethnicity. After this experience, Z. started openly criticizing the Congolese government to his friends and coworkers. Shortly afterwards, government agents arrested and interrogated Z. They kept Z. imprisoned for three months, during which time they beat him nearly every night. A colonel who is friends with Z.'s family intervened and was able to get Z. released from prison. Z. then fled to the United States on a visa. After he fled, government agents went to Z.'s house, questioned Z.'s wife about Z.'s location, and beat her and one of their children. Z. initially applied for asylum with the asylum office, but the asylum office declined to grant his application, and referred his case to the immigration court. Z. already has substantial documentation in support of his claim. His *pro bono* attorneys will need to supplement that documentation and prepare his testimony and any other witness testimony for his merits hearing in 2022.

**47. P. and her daughter, L., are from Honduras. Their merits hearing is January 9, 2023. P. and L. are both independently eligible for asylum. P.'s daughter, L., is also a derivative on P.'s application. They speak Spanish and live in 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. NIJC timely filed P. and L.'s skeletal asylum applications with the immigration court. All affidavits and supporting materials to P. and L.'s cases will be due 15 days prior to her merits hearing in 2023.

**48. L. is a woman from El Salvador. Her sons, F. and N., will be derivatives on L.'s application for asylum. F. is also independently eligible for asylum. L.'s merits hearing is January 30, 2023. L. and her sons speak Spanish and live in central Indiana. (18-0130104) (18-0130370) (18-0130372)**

L. and her family lived across the street from a house that the Mara Salvatrucha (MS-13) used for meetings. L. ran a small store in her home, selling pupusas, tortillas, and other goods. Gang members demanded food from D.'s store. Not wanting to support the gang, D. shut down her store. Later, gang members demanded that L.'s husband help them transport drugs and weapons in his car and threatened to kill him and his family if he ever told anyone about their activity. L.'s husband refused the gang's demands, and they threatened to kill their son F. if he did not comply. Soon after, several gang members in an automobile followed F. on his motorcycle and rear-ended him, leaving him with severe wounds. The MS-13 continued to

threaten L.'s family, eventually saying that they would kill L., her husband, and her sons if they did not vacate their home. Fearing for their lives, L. and her sons fled to the United States. NIJC timely filed L. and F.'s applications for asylum with the Immigration Court in 2019. All affidavits and supporting materials to L.'s case will be due 15 days prior to her merits hearing in 2023.

**49. J. is a young man from Honduras. His merits hearing is February 15, 2023. J. speaks Spanish and lives in a northwest suburb of Chicago, IL. (19-0135978)**

When J. was four years old, his mother sold him to neighbors as a servant. The neighbors brutally abused J. for several years until he escaped to his mother's house. When his mother kicked him out of the house at the age of 13, J. worked a series of jobs while living with different family members. Eventually, he moved in with his sister's family and became the youngest member of a construction crew building new cells within a gang-controlled prison. Gang-affiliated prisoners immediately attempted to force J. to run drugs for them, and when J. ignored their demands, they threatened to send their associates outside the prison to kill J. and his family. As J. continued to receive threats, he also escaped a prison riot during which prisoners killed multiple police officers. Fearing for his life, J. fled Honduras in February 2018. J. timely filed his application for asylum. All affidavits and supporting materials to J.'s case will be due 15 days prior to his merits hearing in 2023.

**50. P. is a woman from Togo. P. speaks Ewe and limited French and lives in Chicago, IL. NIJC will assist her attorneys in identifying an interpreter. (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 timely filed P.'s asylum application with USCIS in September 2017. All affidavits and supporting materials in her case will be due one week prior to her interview at the asylum office. The interview timeline for applications filed before 2018 is uncertain. Please review the asylum office scheduling update at <http://immigrantjustice.org/policy/blog> for more information.

**51. P. is a young man from Honduras. P. speaks Spanish and lives in Milwaukee, WI. (18-0124617)**

P.'s father regularly abused him throughout his childhood, up until his father's death in 2015. After his father's death, a local gang began to heavily recruit P. Although P. refused to join the gang, the gang forced P., under threat of death, to assist them with gang activity, such as transporting drugs, serving as a lookout, and robbing others. As the threats became more

serious, P. decided to flee to the United States in March 2017, fearing that they would force him to participate in worse activities or kill him if he refused. Upon his entry, he was designated as an unaccompanied immigrant child. Although P. was issued a Notice to Appear (NTA), the Department of Homeland Security (DHS) has not filed the NTA with the immigration court and P. is not yet in removal proceedings. Unless and until DHS files the NTA with the court, USCIS maintains jurisdiction over his asylum application. NIJC has filed P.'s skeletal asylum application. Although P. missed his one-year filing deadline, he qualifies for an exception to the deadline, and NIJC will assist his *pro bono* attorneys in making that argument. His affidavit and other supporting documents will be due one week prior to his interview at the asylum office. The timeline for his interview is uncertain.

***52. M. and J. are siblings from El Salvador. M. and J.'s removal proceedings have been administratively closed and they do not currently have a future hearing date scheduled. They speak Spanish and live in Chicago, IL. (16-0104948)***

M. and J.'s maternal uncle was a member of the Mara Salvatrucha (MS-13) gang in El Salvador. Their uncle was involved in an intense feud with members of the Mara 18 (M-18) gang in the same community, and the violence and threats spread quickly to M. and J.'s family as well. Eventually M-18 gang members murdered M. and J.'s uncle and then began to target and extort his remaining family, including M. and J.'s parents. Separately, when J. was just 14 years old, an older man began to pursue her, and she later found out that he was a gang member. He tried to coerce her to enter into a relationship with him, and when J. refused, he began threatening her. J. had to stop going to school to avoid the threats. Fearing that they would never be able to be safe from the gangs, M. and J. fled to the United States in 2016 as unaccompanied immigrant children. NIJC filed their skeletal applications for asylum with USCIS. Although M. and J. missed their one-year filing deadline, they qualify for an exception to the deadline, and NIJC will assist their *pro bono* attorneys in making that argument. Due to a recent policy change, USCIS no longer has jurisdiction over their cases, so M. and J. will now seek asylum before the immigration court. All affidavits and supporting materials to M. and J.'s cases will be due 15 days prior to their merits hearing, which has not yet been scheduled.

## **Special Immigrant Juvenile Status (SIJS)**

*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.*

***53. A. is a 13-year-old boy from Mexico. He speaks Spanish and lives with his mother in Kane County, Illinois. (16-0104982)***

A. has not had a relationship with his father in many years. His parents separated when he



was very young, and A. was raised primarily by his mother. Although he saw his father occasionally when he was young, he has never lived with or visited his father, and his father has never provided any support for him. When A.'s mother came to the United States in approximately 2014, A.'s grandmother and an aunt cared for him. A. came to the United States in November 2015 to reunite with his mother. He was apprehended and detained in the custody of the Office of Refugee Resettlement, and eventually released to his mother's care in December 2015. Although A.'s father's name is not on A.'s birth certificate, A.'s mother believes his father would sign an acknowledgement of paternity. The *pro bono* attorney will need to file a custody case on behalf of A.'s mother, and obtain an order finding that A.'s reunification with his father is not viable due to abandonment and/or neglect, and that it is not in A.'s best interest to return to Mexico.

***54. B. is a 16-year-old boy from Guatemala who speaks Spanish and lives with his brother in Milwaukee, Wisconsin. (18-0125298)***

B.'s father was killed by gangs when B. was two years old. After receiving threats from the gangs himself, B. fled to the United States in April of 2018. B. was apprehended and detained in the custody of the Office of Refugee Resettlement, and was subsequently released to live with his brother. A *pro bono* attorney will need to file a guardianship case on behalf of B.'s brother, and obtain an order finding that B.'s reunification with his father is not viable, and that it is not in B.'s best interest to return to Guatemala. The attorney will need to seek a specific finding that B.'s father's death amounts to abandonment under Wisconsin law.

## **U Visa Cases**

***55. L. is a woman from Mexico who is eligible to file a U visa petition. L. will require a waiver of inadmissibility. L. speaks Spanish and resides in a suburb of Chicago. L.'s application must be submitted to USCIS on or before November 01, 2019. (19-0135399)(19-0136534)***

In 2017, L.'s daughter started receiving obscene photos from another Instagram user. L. reported this incident to the police. The police investigated the crime as obscenity and found that the Instagram user was living in Turkey and had been sending obscene photos to many girls. Both L. and her daughter are in therapy as a result of the incident. In addition, L. has experienced a lot of trauma related to abuse inflicted by the father of her children and losing her son to SIDS when he was 2 months of age. L. lives with her two young USC daughters. L. has two sons (19 and 17 years old) who currently reside in Mexico and will be included as derivatives on her petition.

## **VAWA Cases**

***56. O. is a woman from Mexico who is eligible to file a VAWA self-petition. O. speaks Spanish and lives in a suburb of Chicago. (19-0136445)***

O. has suffered many years of verbal and physical abuse at the hands of her United States citizen husband, R. On many occasions, R. has hit O. and pulled O.'s hair. As a result, O. has gone to therapy for depression. O. is currently separated from R. after one of the many domestic violence incidents she suffered. O. obtained a Plenary Order of Protection against R. after calling the police

and filing a police report. O. has hospital records for the abuse that she has suffered. O. has two children with whom she would like to move forward with her life in the United States.