

September 26, 2019

NIJC Pro Bono Case List: 57 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"*****

➤ **Asylum:**

- [Asylum: Expedited Family Cases \(1 Urgent\)](#)
- [Asylum: Detained Asylum Seekers \(2 Urgent\)](#)
- [Unaccompanied Immigrant Children's Asylum Cases \(1 Urgent\)](#)
- [Asylum: Based on Sexual Orientation and Gender Identity \(1 Urgent\)](#)
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- [Asylum: Based on Political Opinion or Opposition to Criminal Organizations](#)

➤ **Special Immigrant Juvenile Status (SIJS) Cases**

➤ **VAWA**

HOW TO GET INVOLVED

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

- 1) [Attend an Upcoming Training](#) or [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.
- **LGBT** cases, please contact Michelle Velazquez at (312) 660-1306 or mivelazquez@heartlandalliance.org.
- For all other **asylum** cases, please contact Anna Sears at (312) 660-1307 or ansears@heartlandalliance.org.
- For **SIJS** cases, please contact Hillary Richardson at (773) 672-6601 or hrichardson@heartlandalliance.org.
- For **U Visa** or **VAWA** cases, please contact Sylvia Wolak at (312) 660-1318 or 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.

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-teleconference. 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. Y. is a woman from Guatemala. Her two children, R. and E., will be derivatives on her asylum application. Y.'s merits hearing is March 12, 2020. Y. and her children speak Spanish and live in Northeast Indiana. (19-0132139) (19-0132469) (19-0132470)***

Urgent

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 in March 2020.

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.

- 2. L. is a man from El Salvador. His next master hearing is on October 17, 2019. L. is detained at Kenosha County Detention Center in Kenosha, Wisconsin and speaks Spanish (19-0137050). *Urgent****

L. and his partner fled El Salvador in June 2019 after the Mara Salvatrucha (MS-13) gang murdered his partner's teenage daughter. About a month before the daughter's murder, the gang came to L.'s house looking for guns. L. believes this is because of his job doing security work. L. did not have any guns in the house and refused to obtain weapons from his workplace. In April 2019, a gang leader came back to L.'s house and demanded that L.'s partner allow him to date her daughter. She refused and her daughter went missing two days later and was later found dead. Armed gang members came to L.'s house on three different occasions following the daughter's death and continuously threatened L. and his partner's lives. After the last gang visit, the police advised L. that he should leave because his life was in danger and they could not protect him. L. and his partner fled El Salvador soon thereafter. L. previously applied for asylum more than five years ago related to the murder of his young niece. He lost his case and was deported. As a result, L. prior order was reinstated when he reentered the United States and he is now only eligible for withholding of removal and relief under the Convention Against Torture. L. has not yet filed his application for asylum. Once filed, the merits hearing is typically about six to eight weeks later. All affidavits and supporting materials will be due 15 days prior to the merits date.

- 3. G. is a man from Nicaragua. He has not yet been scheduled for his first Master Calendar hearing. G. is detained at Jerome Combs Detention Center in Kankakee, Illinois and speaks Spanish (19-0136548). *Urgent****

G. fled Nicaragua in February 2019 after participating in two anti-government protests against social security reforms. He also brought food and water to protesters on various occasions. In late December 2018, the police attempted to arrest G. because of his participation in the protests. The police beat him with a baton and dragged him on the ground, leaving scars. G. escaped the police with help of onlookers and went into hiding. A few days later, paramilitaries came to G.'s mother's house and left a notice on her door saying that G. had committed a crime against the government and she needed to turn him in or else bad things would happen. G.'s family received these notices three more times. Shortly before he fled the country, G. made a report about these incidents to a human rights organization. G. lived in the United States briefly in 2006 and has a prior deportation order from that time. Because that order was reinstated during his most recent entry, he is only eligible for withholding of removal and relief under the Convention Against Torture. G. has not yet been scheduled for a master hearing and has not yet filed his application for asylum. Once filed, the merits hearing is typically about six to eight weeks later. All affidavits and supporting materials will be due 15 days prior to the merits date.

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.

4. ***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.

5. ***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.

6. ***D. is a gay, man from Nigeria. D. speaks English and lives in Chicago, Illinois. His merits hearing is scheduled for March 6, 2020 (18-0127991). *Urgent****

D. was sexually abused by two female cousins when he was a child. D. started realizing he is gay in high school. After D. and a group of gay students were attacked at his school, D. was expelled. D. met his first boyfriend in high school. That boyfriend was later murdered. He married a woman in 2013 to try to hide his sexual orientation. In March 2018, his wife went to a bishop to report that D. is gay and to seek a divorce. Then, in May 2018, his wife reported D. to the police. The police arrested D. two times and he had to pay a bribe to be released. He was also attacked by a vigilante. In June 2018, D. fled to the United States using his tourist visa, but was stopped at Boston Logan Airport and detained. He was released on parole and moved to Chicago to live with a friend. NIJC filed a change of venue and his asylum application in February 2019. His affidavit and other supporting documents will be due 15 days prior to his merits hearing.

7. *V. is a HIV positive, gay man from Nigeria. He speaks English and lives in Chicago, Illinois. (19-0136936).*

V. started identifying as gay at 15 years old and has been effeminate from a young age. V. started to chat with men on online dating sites in order to be discrete. In 2012, V. was attacked by a man he met on a dating site along with two other men, but was able to escape. In 2015, he was harmed again by a group of men when he went over to meet up with another man he met on an online chat. They hurt him physically to the point where V. was bleeding and received bruises. In 2012, V. found out he was HIV positive. He thinks he contracted it from a man who raped him in 2012. V. was never able to receive medication while living in Nigeria from 2012 until 2017. In 2017, V. moved to Kenya to study and was able to receive treatment there. His status in Kenya was connected to being a student and he does not believe he could obtain permanent residency there. V. was not harmed in Kenya because he was discrete about his sexual orientation. V. came to Chicago on May 8, 2019 with a valid B1/B2 visa to see his sister graduate from university. He then realized that he could not return, as he knows he will be reported and put in jail for 14 years if it is found out he is gay. V. is currently receiving medical treatment from Howard Brown Health; his viral load is lower here than it ever was in Kenya. USCIS must receive his asylum application by May 8, 2020. 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 filing.

8. *J. is a gay man from Mexico. His merits hearing is on September 3, 2020. He is deaf and communicates using ASL. J. lives in Chicago, Illinois. (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. They claim to have reached an agreement with the asylum office prior to August 4 and believe he was erroneously referred, but have not been able to resolve the situation. His affidavit and other supporting documents will be due 15 days prior to his merits hearing.

9. G. is a queer person from Venezuela. G. speaks Spanish and some English and lives in Chicago. (19-0135280).

G. identifies as a gay man now, but would like to explore his gender identity, as he sometimes dresses as a woman. He is interested in starting hormones, but is hesitant to start because he fears even more serious harm if he were returned to Venezuela. Growing up, G. was bullied in school because of his femininity. From the ages of six to seventeen, G. was raped by a cousin. He never told anyone because he was afraid that he would be blamed for the abuse. G. fled Venezuela because he was attacked in April 2019. Two men on a motorcycle followed him home and attacked him. The men used homophobic slurs. G. yelled for help and the men drove away. Later, his neighbor told him that men came by the apartment complex asking for him. G. fears returning to Venezuela for this reason, and because of widespread violence against LGBTQ individuals. USCIS must receive G.'s asylum application by April 25, 2020. All affidavits and supporting materials to G.'s case will be due one week prior to his interview at the asylum office, which will likely occur 4-6 weeks after filing.

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. N. is a woman from Honduras. Her daughter, U. is, a citizen of Honduras and El Salvador, and is a derivative on her N.'s application for asylum. N. and U.'s next Master Calendar hearing is October 8, 2019. N. and U. speak Spanish and live in Chicago, Illinois. (19-0136229) (19-0137082)

N. grew up in a small town in Honduras, and moved to Mexico later in life to search for employment. In Mexico, N. met her former partner, C., a man from El Salvador. C. began abusing, beating, and insulting N. very early on in their relationship. N. tried to separate from C., without success, and eventually moved with him to his parent's home in El Salvador. Together they had a child, U., in 2006. C. continued abusing N. during this time, and eventually he started physically abusing U., as well. When U. was a young child, N. managed to briefly separate from C. and move back in with her parents in Honduras. This move infuriated C. and he started threatening her almost daily by phone. These threatening phone calls continued until 2019, when C. told U. that he was coming to her town to kill her. Fearing for U.'s safety and her own, N. fled to the United States in 2019. NIJC will timely file N.'s application for asylum with the immigration court. All affidavits and supporting

materials to M.'s case will be due 15 days prior to her merits hearing, which has not yet been scheduled.

11. R. is a man from Nigeria. His wife, V., and his children A., D., and F. are derivatives on his application. V., A., and D. are also independently eligible for asylum. Their next Master Calendar Hearing is January 9, 2020. R. speaks English and Yoruba. His family members speak English and Yoruba with varying levels of comfort. R. and his family live in Chicago, Illinois. (19-0136640) (19-0136896) (19-0136900) (19-0136898) (19-0136902)

R. is a member of the Yoruba ethnic group and belongs to a clan linked to his family name. R.'s father was a chief in this clan. In about 2015, another leader in the clan contacted R. and demanded that he allow his daughters to undergo Female Genital Mutilation/Cutting (FGM/C) at an annual festival honoring one of the clan's deities. The practice of FGM/C is more popular among R.'s clan than among the Yoruba ethnic group as a whole. R. told the clan leader that he did not want his daughters to participate. R. objected because he had seen the suffering that FGM/C caused his wife and because he believed the festival was not consistent with his Christian faith. When R. refused a second demand from the clan leaders to have his daughters participate in this festival, members of the clan threatened to kidnap R.'s children and invoke traditional curses to hurt the family. Seeking to protect his children from undergoing forced FGM/C in the future, R. fled to the United States with his family and filed a timely, *pro se* application for asylum with USCIS in 2018. After attending an interview at the asylum office, USCIS declined to make a decision in R.'s case, and referred his case to the immigration court for further review. All affidavits and supporting documentation to R. and his family's case will be due 15 days prior to their merits hearing, which has not yet been scheduled.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

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. T. is a man from Nigeria. His wife N. and their four children E., I., B. and V. are all derivatives on his application for asylum. The family's merits hearing is November 29, 2022. T. and his family speak English and live in a northern suburb of Chicago. (18-0131297) (18-0131299) (18-0131301) (18-0131302) (18-0131303) (18-0131305)

After the birth of T. and N.'s first daughter, E., T.'s family was adamant that E. be circumcised. T.'s family repeatedly contacted T. and N., demanding that they allow E. to be circumcised. When the couple's second daughter, B., was born, T.'s family became even more insistent that the couple allow both daughters to be circumcised. T.'s family arrived at his home on multiple occasions and attacked N. and N.'s father. N.'s father died in the weeks following one attack. T. traveled to the United States in May 2017, planning to only stay for a few weeks, after his family promised not to target his wife and daughters while he was gone. But soon after he arrived, he learned that his family members had broken into his home and attacked his wife, requiring her hospitalization. After he was told that his family would kill him if he came back, T. began making preparations for his wife and children to flee to the United States to be with him and then eventually entered the United States in September 2017. T. filed a timely, *pro se* application for asylum with USCIS in 2018. After attending an interview at the Asylum Office, USCIS declined to make a decision in T.'s case and referred his case to the Immigration Court for further review. All affidavits and supporting materials to T.'s case will be due 15 days prior to his merits hearing in 2022.

21. 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.

22. K. is a woman from Honduras. K.'s daughter, M., is independently eligible for asylum. K.'s merits hearing is June 6, 2023.. 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 in 2023.

23. 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.

24. 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.

25. 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 with the immigration court, her *pro bono* attorneys should request to consolidate her case with her father's prior to his merits hearing.

26. 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.

27. 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.

28. 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.

29. 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. NIJC timely filed R.'s application for asylum with the Immigration Court. All affidavits and supporting materials to R.'s case will be due 15 days before his merits hearing, which has not yet been scheduled.

30. 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 March 23, 2020. 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.

31. 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 March 23, 2020. 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.

32. 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 March 25, 2020. 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.

33. 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.

34. 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 and the Immigration Court. Her affidavit and supporting documents will be due prior to her 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. 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.

37. 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.

38. 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.

39. 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.

40. 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.

41. 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 May 18, 2020. 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.

42. 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.

43. 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.

44. 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.

45. 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.

46. 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.

47. 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.

48. 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.

49. 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.

50. 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.

51. Q. and R. are sisters aged seven and four. They speak Spanish and live with their mother in Chicago, Illinois. (18-0130771)

Q. and R. came to the United States with their mother, who fled her native El Salvador and subsequently lived in Guatemala and Mexico before entering the United States in May of 2018. The sisters were born in Guatemala. Q. and R.'s father separated from their mother shortly after R.'s birth, and has not provided them with any support since that time. He refused to allow his name to be put on R.'s birth certificate, but subsequently admitted to her mother that R. was his daughter, and may be willing to sign an acknowledgement of paternity. A *pro bono* attorney will need to file a parentage case for Q. and R., obtain an order finding that the sisters' reunification with their father is not viable due to abandonment, and that it is not in the girls' best interest to return to their country of origin.

52. M. is an 8-year-old boy from El Salvador. He speaks Spanish and lives with his mom in Newton County, Indiana. (17-0119852)

M. does not remember his father and has not had a relationship with him in many years. M.'s mother fled to the U.S. in 2012 after receiving threats from gangs, leaving M. and his older sister with another family member. The next year, M.'s older sister was threatened as well, and fled to the U.S. with M., who was only 2 years old at the time. M. and his older sister, who is now an adult, live with their mother in Newton County, Indiana. M.'s father is still in El Salvador, and has not provided for M. emotionally or financially. A *pro bono* attorney will need to file a custody case on behalf of M.'s mother, obtain an order finding that M.'s reunification with his father is not viable due to abandonment, and that it is not in M.'s best interest to return to El Salvador.

53. R., S., and T. are siblings aged 12, 11, and 8 from Guatemala. They speak Spanish and live with their mother in Milwaukee, Wisconsin. (17-0115463)

R., S., and T.'s father was extremely physically abusive to them and their mother. He regularly beat and insulted the children, and after he and their mother separated, he allowed his new girlfriend to beat them as well. T. fled to the United States with her mother in 2014, and R. and S. came later, in December 2016. Since their arrival, R., S., and T.'s father has not financially provided for them and they have had no contact with him. The *pro bono* attorney will need to file a custody case on behalf of R., S., and T.'s mother, obtain an order finding that reunification with their father is not viable due to his abuse and neglect, and that it is not in their best interest to return to Guatemala.

54. U. is a 14-year-old girl from Honduras who speaks Spanish and lives with her mother in Hamilton County, Indiana. (16-0110180)

U.'s father has never provided her with any financial support, and as a result, U.'s mother came to the United States in 2012 to find work and send money home to support her children. U. and her sister were left with an aunt, as their father had a new girlfriend and refused to care for them.

In 2016, U. and her sister began receiving threats from gang members and fled to the United States. U. and her sister, who is now and adult, live with their mother in Indiana. A pro bono attorney will need to file a custody case on behalf of U.'s mother, obtain an order finding that reunification with her father is not viable due to his abandonment and that it is not in her best interest to return to Honduras.

VAWA Cases

55. O. is a woman from Mexico. O. is eligible to file a VAWA self-petition. O. speaks Spanish and lives in a suburb of Chicago, Illinois. (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.

56. J. is a gay man from Mexico. J. is eligible to file a VAWA self-petition. He speaks English and lives in Chicago, Illinois. (19-0137117).

J. entered the United States without inspection in 2000 and has lived here ever since. J. met his now abusive, U.S. citizen husband, A., in 2010 at their mutual workplace. They started dating in 2013 and married on March 20, 2014. Since the beginning of their relationship, A. would physically hit J. when he slept and would then force J. to sleep on the floor. J. would get bruises from this physical abuse. Since marrying each other, A. psychologically abused J by isolating him from all of his friends and family. When they were living in Indiana in 2018, A. would force J. to stay in the house for days without money, limited food or transportation. They filed a Family Petition for J. on September 18, 2017 but later A. refused to file the Adjustment of Status Application (green card) as he feared that J. would leave him. At the same time, A. would call J. derogatory terms due to his immigration status. In July of 2019, J. realized that A was controlling him and that the marriage was not going to improve. J. left and has been receiving help from an agency in Chicago. His *pro bono* attorneys must file his VAWA self-petition application along with supporting documentation to USCIS in a timely manner.

57. L. is a lesbian woman from Colombia. L. is eligible to file a VAWA self-petition. She speaks Spanish and lives in Chicago. (19-0137370).

L. is seeking VAWA affirmatively. Although, since her abusive, U.S. citizen wife withdrew the family petition, it is possible that she will be referred to court. NIJC has submitted a USCIS FOIA for the full A number file to find exactly what was submitted on her behalf. L. first met her wife, G., when G. was visiting Colombia. L. most recently entered the U.S. on a tourist visa in June 2016. G. proposed shortly after. They married in November 2016. The abuse began about four months later. It began with normal verbal fights, but G. escalated to physically harming L. and threatening her with deportation. G. destroyed L.'s phone and passport. G. petitioned for L., but the attorney they used was a friend of G. They were scheduled for an

interview, but G. withdrew her petition in advance. L. stopped living with G. in June 2018. L. sought domestic violence services in Florida, where G. and L. lived together. Finally, she came to Chicago in October 2018 to live with a friend. L. has some supporting evidence gathered. While waiting for the FOIA results, pro bono attorneys can develop evidence of the abuse. Her pro bono attorneys must file her VAWA self-petition application along with supporting documentation to USCIS in a timely manner.

Upcoming Pro Bono Trainings and Events

See our calendar of events and RSVP for these events [here](#)

Indiana Pro Bono Training: Representing Asylum Seekers

On **October 10, 2019 from 12:00pm – 3:00pm**, **Faegre Baker Daniels**, located at 300 N. Meridian St in **Indianapolis, IN**, will host a training for *pro bono* attorneys interested in representing asylum seekers. This training provides an intensive overview of the basics of asylum law and procedure before the asylum office and the immigration court. Experts will discuss current laws, policies and strategies to work with clients to prepare and present a strong case. **Indiana and Illinois CLE credit will be available, but space is limited!** Please contact Anna Sears at ansears@heartlandalliance.org to RSVP or with any questions.

Pro Bono Training: Representing Asylum Seekers

On **October 17, 2019 from 8:45am – 12:00pm**, **Winston & Strawn LLP**, located at 233 S. Wacker Dr., will host a training for *pro bono* attorneys interested in representing asylum seekers. This training provides an intensive overview of the basics of asylum law and procedure before the asylum office and the immigration court. Experts will discuss current laws, policies and strategies to work with clients to prepare and present a strong case. **Illinois CLE credit will be available, but space is limited!** Please contact Anna Sears at ansears@heartlandalliance.org to RSVP or with any questions.

Pro Bono Celebration Week!

On **October 30, 2019** in conjunction with *Pro Bono* Celebration week, NIJC will celebrate with our *pro bono* network at **McDermott Will & Emory**. Stay tuned [here](#) for more details.