

NATIONAL IMMIGRANT JUSTICE CENTER

A HEARTLAND ALLIANCE PROGRAM

October 24, 2019

NIJC *Pro Bono* Case List: 59 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.
- **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 Trisha Teofilo at (312) 660-1304 or tteofilo@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 on March 12, 2020, but is likely to move to a later date. 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. When she was 17 and gave birth to her first child, her partner began abusing her and continued 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.

- 2. 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.'s merits hearing is on March 27, 2020. N. and U. speak Spanish and live in Chicago, Illinois. (19-0136229) (19-0137082) *Urgent****

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 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 timely filed 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 in March 2020.

- 3. O. is a woman from Guatemala. Her daughter, T., will be a derivative on her application. O. and T.'s next Master Calendar hearing is on November 21, 2019. N. speaks Spanish and lives in Chicago, Illinois. (19-0137849) (19-0138329) *Urgent****

Members of the Mara 18 (M18) tried to extort O. and her family members in Guatemala, and threatened to kill O. and kidnap her daughter, T., if O. did not pay them. During the same period, M18 members kidnapped the daughter of O.'s neighbor, who also refused to comply with the gang's extortion demands. O. reported these threats to the police in Guatemala, but was unable to receive protection. After the gang threatened O., they also threatened and attacked her brother, assaulting him with a machete while he was traveling on a bus. Fearing further attacks from the gang, O. fled Guatemala with T. in 2019. The immigration court must receive O.'s application for asylum, with T. included as a derivative, by April 8, 2020. All applications and supporting materials to O.'s case will be due 15 days prior to her merits hearing, which will likely occur before in early 2020 because O. and her daughter have been designated as 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.

- 4. P. and O. are sisters from Cameroon. P.'s next Master Calendar hearing is on November 21, 2019 and O.'s next Master Calendar hearing is on November 15, 2019. They are both detained in McHenry Co., IL and speak English. (19-0138221) (19-0138223)*Urgent****

P. and O. fled Cameroon in April 2019, after the Cameroonian military detained, beat, and threatened them for perceived membership in the English-separatist movement. P. and O. both support the efforts of Southern Cameroon National Council. P. has protested against the Cameroonian government and is an English teacher and O. has spoken out against the marginalization of Southern Cameroon. The Cameroonian government first arrested P. when she participated in a peaceful protest against the marginalization of Southern Cameroon in 2017. They detained and tortured her for five days and called her a separatist. Her family paid for her release and she had to sign an agreement not to protest the government. Likewise, the government first arrested O. in May 2018 while she was distributing posters for the SCNC. Officials held her for 10 days and throughout her detainment, officials beat and starved her. Her husband paid for her release and then she and her family fled into a forest for four months. After O. and P. were stopped at a security checkpoint, government officials detained

them after identifying P. as an English teacher and O. as a separatist. Officials detained O. and P. for around 20 days, during which they tortured them until their family bribed the guards to release them. The guards told the sisters that if they caught them again, they would kill them. Since fleeing Cameroon, the military has continued searching for O. and P. They burned their house down and forced some of her family members into hiding. O. and P. presented themselves at the U.S.-Mexican border on August 28, 2019 seeking asylum, but due to the second asylum ban (the third-country transit ban), they will only be eligible for withholding of removal and relief under the Convention Against Torture. Although P. and O.'s cases are not consolidated, their cases should be handled by attorneys from the same firm. Their individual merits hearing should be scheduled about 6-8 weeks after their next master calendar hearings. 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.

- 5. G. is a young man from Guatemala. Because he is an unaccompanied immigrant child, USCIS has initial jurisdiction over his application for asylum, even though he is in removal proceedings. His next Master Calendar hearing is on November 20, 2019. G. speaks Spanish and lives in Chicago. (19-0135093) *Urgent****

In Guatemala, G.'s grandfather severely abused G. and forced him to work. As a teenager, G.'s older cousin threatened to kill him over a land dispute within their family. In order to escape further abuse and potential harm from his family members, G. fled Guatemala in 2019. On his journey through Mexico to get to United States, cartel members kidnapped G. and tortured him when he refused to work for them. This cartel is active in Guatemala as well as Mexico. After three months of imprisonment, forced labor, and torture, the cartel members released him and G. fled to the United States. NIJC timely filed G.'s skeletal asylum application on August 6, 2019. All affidavits and supporting materials to G.'s case will be due one week prior to his interview at the asylum office, which is likely to occur in one to two months. NIJC has already completed substantial preparation in G.'s case, and will share all draft materials with his *pro bono* attorneys.

- 6. L. is a young man from Guinea. Because he is an unaccompanied immigrant child, USCIS has initial jurisdiction over his asylum application, even though he is in removal proceedings. His next Master Calendar hearing is on December 12, 2019. M. speaks French and Fulani and lives in Chicago. (19-0134367) *Urgent****

The Guinean military killed L.'s mother in the ethnically and politically-fueled September 28 Stadium Massacre of 2009, also known as "Bloody Monday." In 2018, the Guinean military arrested L. due to his ethnicity, and because they erroneously believed he supported an opposition political party. The military imprisoned and tortured L. for approximately three weeks until L.'s brother paid a guard and helped L. escape prison and flee from Guinea. NIJC

timely filed L.'s skeletal asylum application. All affidavits and supporting materials to L.'s case will be due one week prior to his interview at the asylum office, which is likely to occur in one to two months. NIJC has already begun preparation of L.'s case, and will share all draft materials with his *pro bono* attorneys.

7. ***A. is a young woman from Vietnam. Because she is an unaccompanied immigrant child, USCIS has initial jurisdiction over her asylum application, even though she will soon be in removal proceedings. A. speaks Vietnamese and lives in Wisconsin. (19-0136094) *Urgent****

The Vietnamese police arrested A. in June 2018 at a peaceful protest against a land deal between the Vietnamese and Chinese governments. While A. was in their custody, Vietnamese police hit A., interrogated her about her political affiliation, and a prison employee molested her. After her release, the police continued to intimidate and harass A. and her family due to A.'s participation in the protest. The police vandalized her family's business and interrogated A. repeatedly about her political involvement. Fearing for her life, A. fled to the United States in June 2019. USCIS must receive A.'s skeletal asylum application by November 22, 2019, prior to her 18th birthday. Although A. was issued a Notice to Appear (NTA) when she entered the United States, the Department of Homeland Security (DHS) has not yet filed that NTA with the immigration court, so A. is not yet in removal proceedings. All affidavits and supporting materials to A.'s case will be due one week prior to her interview at the asylum office, which will likely occur 1-2 months after filing.

8. ***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 on March 3, 2020. L. and her son speak Spanish and live in Indianapolis, Indiana. (18-0129856) *Urgent****

L.'s father has abused L., her siblings, and her mother since L. was a young child. His abuse of L. was primarily verbal and emotional, but he physically abused her sisters in front of L. and physically abused L.'s son. 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, frequently armed, threatened the family and vandalized the home. L. also fears harm from her ex-partner, the father of her son. L.'s ex-partner is a member of an armed vigilante group that purports to fight the gangs in Honduras and regularly carries weapons. When L. ended their relationship, he began threatening to kill her, especially if she started a relationship with someone else. Fearing further abuse from her father and ex-partner, L. fled to the United States. NIJC timely filed L.'s application for asylum with USCIS on October 24, 2019, with K. included as a derivative. 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. L.'s attorneys should note that L. likely has the ability to obtain Nicaraguan citizenship through her mother. Although this should not impact her case because she does not currently hold Nicaraguan citizenship, her attorneys may ultimately need to address this issue.

9. ***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.

10. 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.

11. 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.

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

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.

13. J. is a gay man from Brazil. J. speaks Portuguese and lives in Chicago, IL. (19-0137185).

J. is fled Brazil after suing two of his employers for discriminating against him and being violently attacked three times in Brazil. J. filed lawsuits under Brazilian defamation and moral damages laws (at the time sexual orientation was not protected under Brazilian law) after his supervisors used homophobic slurs against him, confiscated his phone because of its "girly" pink case, and once even cut him with a knife while yelling homophobic slurs. Although he received favorable outcomes in two of the three suits he filed (one is still pending), he believes the defendants only received minimal sentences because the judges did not take homophobic violence and discrimination seriously. While the lawsuits were pending, he moved to Sao Paulo because he was receiving death threats from his former supervisors. In Sao Paulo, he suffered three violent homophobic attacks during a period of two months, prompting him to come to the United States. In total, J. went to the Brazilian police about 15 times during the course of problems with his employers and the attacks in Sao Paulo and was consistently turned away or had his requests ignored. USCIS must receive J.'s asylum application by July 31, 2020. All affidavits and supporting materials to J.'s case will be due 15 days prior to his interview at the asylum office, which will likely occur 4-6 weeks after filing.

14. E. is a lesbian woman from Kyrgyzstan. She lives in Chicago, IL and speaks English.

(19-0138271).

E. identifies as a lesbian woman, but would like to continue exploring her sexual orientation and gender identity. E. grew up with an abusive father. She has felt attracted to women since she was about four or five. When she was about 18 years old, a male friend who had been interested in her, learned that she was a lesbian. He convinced E. to spend time with him as a way to hide her sexual orientation. Over time, he became extremely abusive, tracking her movements and regularly raping her. He threatened E. that if she left him, he would tell her parents that she was a lesbian and not a virgin at that she would be forced to marry him. In March 2019, she volunteered with the Women's March in Kyrgyzstan and was photographed wearing a rainbow pride t-shirt. E. had long struggled with her mental health and the effects of the abuse she suffered, and in the months following the march, she realized she would never be able to live safely in Kyrgyzstan. She flew to the United States in June 2019. USCIS must receive E.'s asylum application by June 10, 2020. All affidavits and supporting materials to E.'s case will be due 15 days prior to her interview at the asylum office, which will likely occur 4-6 weeks after filing.

15. S. is a gay man from Russia. S. speaks English and Russian and lives in Wheeling, IL. (19-0138181).

S. has identified as gay from a young age. He grew up in St. Petersburg, Russia, with parents who were intolerant of the LGBT community. As a child and teenager, S. remembers that his parents used to mock gay people and say derogatory comments about the LGBT community at home. S. never officially come out to his parents, but he thinks they know about his sexual orientation because he was an activist for LGBT issues in St. Petersburg. As a teenager, S. participated in movements organized by the St. Petersburg-based, LGBT organization, "Coming Out." He was arrested in Russia on April 2016 for participating in a demonstration. S. was also verbally and physically assaulted on two separate occasions when he was in public with his boyfriend. The police laughed at S. when he attempted to file a report. S. fears being harmed in Russia because of his continued involvement in the LGBT activist community and because of his intolerant family. Upon hearing the news in summer 2019, about different LGBT activists being killed or threatened in Russia, S. decided that returning to his home country was not an option. S. entered the United States in June 2019 on a J-1 visa. USCIS must receive S.'s asylum application by June 10, 2020. All affidavits and supporting materials to S.'s case will be due 15 days 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.

16. 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.

17. 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.

18. 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.

19. 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.

20. S. is a woman from Swaziland. Her daughter and son will be derivatives on her application. Their merits hearing is on 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.

21. 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.

22. R. is a woman from Guatemala. Her two children, G. and T., will be derivatives on her asylum application. Her merits hearing is on 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.

23. N. is a woman from Guatemala. N.'s daughter, F., will be a derivative on her application for asylum. N.'s merits hearing is on 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.

24. Q. is a woman from Honduras. Her son, Y., will be a derivative on her application. Q. and Y.'s merits hearing is on 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.

25. 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 on 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.

26. 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 on 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.

27. K. is a woman from Honduras. K.'s daughter, M., is independently eligible for asylum. K.'s merits hearing is on 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.

28. D. is a woman from Mongolia. Her husband, J., is a derivative on her application for asylum. She speaks Mongolian and lives in Chicago, Illinois. 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.

29. 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.

30. B. is a woman from El Salvador. Her children, W. and D., will be derivatives on her application for asylum. B.'s next Master Calendar hearing is on December 18, 2019. B. and her children speak Spanish and live in Central Indiana. (17-0121105) (17-0121956) (17-0121957)

B. ran a small business along with her partner, in Honduras selling fruit in a market. The daughter of B.'s partner did not support the relationship and frequently tried to get her father to leave B. The daughter's boyfriend is also a Mara 18 gang member. When B.'s partner came to the United States, B. was left alone to run their business. Soon after, Mara 18 gang members took control of her home and began extorting her business. One day, the boyfriend of her daughter's partner and two other Mara 18 gang members kidnapped B. and gang raped her, taking photos to send to her partner's daughter. When B. became pregnant from the rapes, the Mara 18 members told her she had to get rid of the baby because it would cause problems for them with their girlfriends. B. denied her pregnancy but eventually could not hide it any longer and was forced to flee to the United States to avoid retaliation from the Mara 18 gang members for refusing to get an abortion. After arriving in the United States, B. missed a court date and was ordered removed in absentia. A few years later NIJC successfully reopened B.'s court case. Because B. and her children did not file their applications for asylum with the immigration court until more than one year after they entered the United States, B.'s *pro bono* attorneys will need to and argue that she merits an exception to the one-year filing deadline. NIJC will assist them in making that argument. All affidavits and supporting documents to B.'s case will be due 15 days prior to her merits hearing, which has not yet been scheduled.

31. D. is a woman from Togo. Her next Master Calendar Hearing is on 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.

32. 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 on March 23, 2020. E.'s next Master Calendar Hearing is on July 09, 2020. O.'s next Master Calendar Hearing is on 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.

33. 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 on 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.

34. 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 on April 22, 2020. 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.

35. 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.

36. V. is a woman from Mexico. Her children, N., C. and T. will be derivatives on her application for asylum. V., N., C. and T. speak Spanish and live in Northcentral Indiana. (19-0137239) (19-0137260) (19-0137261) (19-0137262)

V. was raped by M., a police officer, at age 14. M. forced V. to live with him from then on and she endured years of abuse at his hands, including forced sterilization when her last child was born. Later, M. quit the police force to join the Las Zetas cartel. M. was arrested in Mexico several years ago. M. forced V. to visit him in prison and continued to threaten and sexually abuse her in prison. V. moved several times to escape him, but M. always found her from prison

and threatened to kill her if she ever tried to leave him. After several years, V. met another man, X., and began a secret relationship with him. M. discovered V.'s new relationship and X.'s identity. After threatening phone calls and messages, Las Zeta cartel members crashed into X.'s car, threatening to kill him if he didn't leave V. After the crash, M.'s parents told V. that M. will be released from prison soon. Fearing that M. would follow through on his threats once released, V. fled to the United States with her three children. Although V. and her children 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 retains initial jurisdiction over their applications for asylum. NIJC timely filed V.'s asylum application with USCIS in September 2019. All affidavits and supporting materials for V.'s case will be due one week prior to her asylum interview, which will likely occur about one to two months after filing, unless her NTA is filed with the court.

37. 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 in April 2019. Her affidavit and supporting documents will be one week prior to her asylum office interview. The timing of this interview is uncertain.

38. 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.

39. J. is a young man from Nicaragua. J. next Master Calendar hearing is on March 9, 2021. 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.

40. K. is a young man from Vietnam. K.'s merits hearing is on 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 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 on 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.

44. L. is a man from Guatemala. L.'s merits hearing is on 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. Z. is a man from Republic of Congo. Z.'s merits hearing is on 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.

46. 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.

47. 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.

48. 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.

49. 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.

50. 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.'s *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.

51. 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.

52. 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 an 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.

53. H. is a 16-year-old boy from Honduras. He speaks Spanish and lives in a northern suburb of Chicago with his mother. (Lake County) (19-0133868)

H has never had a relationship with his father. When H was about three, H's mother came to the United States seeking work to be able to support H. H. was raised in Honduras by his maternal grandmother. H's father never emotionally or financially supported H, and had begun a relationship with another woman even before his birth. Eventually, H's grandmother became unable to continue to care for him in Honduras due to her advancing age and in April 2019 he

came to the United States. He was apprehended and detained in the custody of the Office of Refugee Resettlement, and was subsequently released to his mother in Illinois. A pro bono attorney will need to file a custody case on behalf of H.'s mother, and obtain an order finding that H.'s reunification with his father is not viable due to his abandonment, and that it is not in H.'s best interest to return to Honduras.

VAWA Cases

54. M. is a woman from Nigeria. M. is eligible to file a VAWA self-petition and an adjustment of status application simultaneously. M. speaks English and lives in northwest Indiana. (19-0137019) (19-0138259)

M. married G., hoping to build a loving and stable relationship for herself and her children. However, G. began to threaten M. with immigration if she did not obey him. G. would often coerce, intimidate, and embarrass M. throughout their relationship. M. began to fear for her life when G.'s threats escalated. G. has threatened to kill M. on multiple occasions. He also threatened her youngest daughter, telling her that he would kill her and hide her body. She has filed multiple police reports, and is searching for a way to escape G. and find safety for herself and her children. M. is still married to G., so at this time there is no deadline.

55. 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.

56. O. is a 56-year-old 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.

U Visa Cases

57. V. is woman from Mexico. V. is eligible for a U visa based on the qualifying crime of Domestic Violence. V. speaks Spanish and resides in a suburb of Chicago. V.'s case must be filed before January 23, 2019. (18-0122830) (19-0138134).

V. was the victim of domestic violence perpetrated by her partner J. He would not allow her to leave the relationship, and threatened her. She was eventually able to leave the relationship, but the day she moved out of her home J. became physically abusive to try to prevent her to leave and V. had to request the help of police so that she could leave the home safely with her children. After V. separated from J., he continued to threaten her. During one serious incident, J. assaulted V. at her workplace. He punched and scratched her, and she was able to get away and get help from the police. V. also received orders of protection against J. She is seeking safety and security for herself and her four US citizen children. V.'s husband, J., is hoping to be a derivative on her application.

58. C. is a man from Mexico. He speaks Spanish and resides in Chicago. He qualifies for the U visa based on Felonious Assault. His wife, M., will be a derivative on his application. Their applications must be received by January 31, 2020. (18-0126535) (19-0138088).

C. came home late one night and parked his car in his garage. When he opened the door of his car, a man pulled him out of his car and threw him to the ground. He got up and another man came up behind him, threw him against his car and held a gun to his head. The man grabbed him again and threw him against the walls of the garage. He called the police to report the incident. He gave police all of the details of the crime and described the assailants. He was never called again for any additional information. He thinks the perpetrators were caught when they assaulted someone at a mall because their pictures were on TV. C.'s wife, M., will be a derivative on C.'s U visa application.

59. A. is a woman from Mexico. She speaks Spanish and resides in a suburb of Chicago. She qualifies for the U visa based on Domestic Violence. Her application must be received by April 1, 2020 (17-0120480) (19-0138486).

A. was the victim of domestic abuse at the hands of her ex-partner, E. In 2002, E. and A. went out shopping and forgot their house keys. E. became very angry with A. because they were locked out of the house. E. hit A. several times, leaving a red bruise on her eye and cheek. A. called the police and E. was arrested. In 2003, E. hit A. again when her daughter was 6 months old. The police arrested E., but A. did not press charges. In 2004, A. and E. were arguing because E. was very jealous. He began to verbally assault A., and she told him that she was going to call the police. When she tried to leave, he pushed her, punched her and threw her on the ground. A. called the police, and E. left the house. A. made a report for domestic battery.

Upcoming Pro Bono Trainings and Events

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

NIJC Celebrates our *Pro Bono* Network!

It's that time of year again! Join us in celebrating the extraordinary dedication of our more than 1,800 *pro bono* attorneys and the significant impact they have made. We will celebrate on **October 30, 2019** from **5:30 – 7:30 p.m.** at **McDermott Will & Emory**. All current and prospective *pro bono* attorneys are encouraged to attend. RSVP required [here](#).

U Visa Training

On **Nov. 1, 2019**, from 12:00 – 2:00 pm, Morgan, Lewis & Bockius LLP will host a training for *pro bono* attorneys interested in representing immigrant victims of crime who are eligible to apply for U visas. This immigration benefit helps victims escape domestic violence, receive protection from deportation, and obtain work authorization. Illinois CLE credit will be available and lunch will be provided. RSVP by Oct. 28 at <https://immigrantjustice.salsalabs.org/probonotraining-uvisas>.

Representing LGBT Asylum Seekers

NIJC and the Lesbian and Gay Bar Association of Chicago (LAGBAC) invite attorneys to attend a one-hour Continuing Legal Education presentation discussing issues attorneys face when representing LGBT immigrants in asylum proceedings. One-hour of Illinois general CLE credit will be available to program participants. The training is generously hosted by SmithAmundsen LLC. To RSVP email: jjgray@lagbac.org

Go the extra mile! NIJC 5K Run/Walk For Immigrant Justice

Join us for the first National Immigrant Justice Center (NIJC) 5K Run/Walk for Immigrant Justice in Goshen, Indiana! Together, we will raise awareness, support immigrants' rights, and fund life-changing legal services in our community. Your participation in this race, and any additional donation you are able to make to NIJC, will fund legal services for families who face separation and individuals fleeing harm in addition to community outreach and education. Register [here](#)!