

August 17, 2021

## **NIJC Pro Bono Case List: 60 cases need pro bono representation.**

Immigrants do not have the right to appointed counsel and without pro bono representation, many of NIJC's clients would be forced to seek immigration relief on their own. NIJC pro bono attorneys defend the legal rights of immigrants, prevent permanent family separation and deportation to persecution and torture, and help ensure access to justice for all.

**\*\*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 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:

- **Asylum** cases, contact Beatriz Schaver at [bschaver@heartlandalliance.org](mailto:bschaver@heartlandalliance.org).
- **SIJS** cases, contact Hillary Richardson at [hrichardson@heartlandalliance.org](mailto:hrichardson@heartlandalliance.org).
- **U Visa** or **VAWA** cases, contact Lizbeth Sanchez at [lisanchez@heartlandalliance.org](mailto:lisanchez@heartlandalliance.org)
- **LGBT** cases, contact Bek Erl at [jerl@heartlandalliance.org](mailto:jerl@heartlandalliance.org).

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

## **Asylum Matters**

### **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 and especially after the Attorney General's recent vacatur of negative case law. 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.*

- 1. M. is a woman from Honduras. Her son A. is a derivative on her asylum application and is also independently eligible for asylum. M. and A.'s merits hearing is on December 17, 2021. The family speaks Spanish and lives in Chicago, Illinois. (21-0148637) (21-0148806) \*Urgent\****

When M. was a child, a family member sexually abused her. M. met her abusive partner and the father of her child when she was 18 years old. Shortly after she became pregnant with their child, he abused M. physically, emotionally, and financially. He tried to harm her so that she would lose their baby. In addition, her partner's grandfather was a judge in Honduras who threatened to take M.'s son away from her. In order to escape from her abusive partner, M. moved away to a different part of Honduras; however, this area was controlled by gang members who stalked M. and demanded that she have sexual relations with them or they would harm her child and other family members. M. lived in hiding before she fled to the United States with her son. M. filed a timely application for asylum. All filings will be due 30 days prior to the hearing.

- 2. M. is a woman from Honduras. Her daughter, D., will be a derivative on her asylum application and is also independently eligible for asylum. M. and D. speak Spanish and live in northcentral Indiana. (20-0143663) (20-0143734)***

When M. was a young teenager, her uncle raped her and then forced her to live with him for years, where he beat and raped her regularly. As a result, M. gave birth to her daughter when she was about 16 years old. After continued abuse, M. finally escaped to the United States with her daughter, D., in 2019. Although M. and D. were issued Notices to Appear (NTAs) by the Department of Homeland Security (DHS) when they entered the United States, their NTAs have not yet been filed with the immigration court. Unless and until their NTAs are filed with the court, USCIS retains initial jurisdiction over their applications for asylum. NIJC filed M. and D.'s applications for asylum with USCIS in August 2020. Because these applications were filed more than one year after M. and D. entered the United States, their pro bono attorneys will need to argue that they merit an exception to the one-year filing deadline for asylum. NIJC will assist them in making this argument. All affidavits and supporting materials to their case will be due one week prior to M. and D.'s interview at the asylum office, which could occur at any time in the coming months, unless their NTAs are filed with the immigration court.

- 3. 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 with USCIS in May 2017. Affidavits and other supporting documents will be due one week prior to her interview at the asylum office. The date of the interview is uncertain at this time.

- 4. M. is a young woman from Honduras. Her son, O., is a derivative on her application for asylum and is also independently eligible for asylum. They are currently awaiting the scheduling of their merits hearing. M. and O. speak Spanish and live in northern Illinois. (18-0130624) (18-0131084)**

M.'s father and other caretakers physically and emotionally abused her throughout her life in Honduras. When she was 15 years old, she met O.'s father. Soon after they began a relationship, he started to beat and rape M. frequently, and continued to do so throughout her pregnancy with O. He and his family also emotionally abused M. and blamed her for the abuse. M. fled to the United States shortly after O.'s birth. NIJC timely filed M. and O.'s applications for asylum in 2019. All affidavits and supporting documentation for M. and O.'s case will be due 30 days prior to their merits hearing, which has not yet been scheduled.

- 5. H. is a woman from Nigeria. Her husband, D., and their three children, will be derivatives on her application for asylum and are also independently eligible for asylum. Their Master Calendar hearing was cancelled due to the Covid-19 pandemic and has not been rescheduled. H. and her family speak English and Yoruba and live in Central Indiana. (20-0145257) (20-0144688) (21-0145523) (21-0145524) (21-0145525)**

H. and her husband, D., have been practicing Christians for over 30 years and have held senior leadership positions within their church for some time. H. and her husband both adamantly oppose the spiritual practices of their family ethnic group, which include fertility rituals, female circumcision, and the worship of idols. Because of their opposition, H. and her family members

suffered physical attacks and ongoing threats from family elders. They relocated to Lagos in order to avoid further harm, but were unable to live there safely. In 2010, a group of elders forced their way into H.'s home and beat her with sticks. H. was badly bruised all over her body and was hospitalized for over a month; this attack resulted in the stillbirth of her child. In 2014, family elders began to demand that H. and her husband submit their daughter, K., to them for female circumcision. When they refused, the elders began threatening to kidnap H. and D.'s children and kill H. and D. if they did not comply. H. and her family fled to the United States in 2019 and filed for asylum with the USCIS asylum office, but USCIS referred their applications to the immigration court for further review. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

**6. R. is a woman from Honduras. Her son, X., is a derivative on her application for asylum. Their next Master Calendar Hearing is on January 5, 2022. R. and her son speak Spanish and live in the Indianapolis area. (21-0147328) (21-0147374)**

Growing up, R. lived with her grandparents, aunts, and uncles. When she was about eight years old, her uncle began to molest her. Her aunt and grandmother also abused her verbally and physically, and did not believe her when she shared about her uncle's abuse. R. ran away when she was about 15 and eventually met the father of her son, who physically, verbally, and sexually abused her. R. fears her ex-partner will try to take X. from her if she has to return to Honduras. R. fled Honduras after being robbed and threatened at gunpoint. When she attempted to seek asylum in the United States, she was placed in the MPP "Remain in Mexico" process where she was forced to remain in Mexico for about one and a half years while waiting for her asylum case to be adjudicated. During this time, she received threatening messages from the father of her child. In March 2021, R. and her son were paroled into the United States after the administration ended the Remain in Mexico policy. R. timely filed her asylum application while in Mexico, although due to the challenges of seeking asylum while in Mexico, the application does not fully account for all of the past persecution she suffered. All affidavits and supporting materials will be due 30 days prior to her individual merits hearing, which has not yet been scheduled.

**7. R. is a woman from Honduras. Her partner, B. and son J. are derivatives on her application for asylum, and are also independently eligible for asylum. The family's merits hearing is on August 26, 2022. The family speaks Spanish and lives in Chicago. (21-0149155) (21-0146931) (21-0146841)**

When R. was a teenager, a friend introduced her to a man who later raped her while he was armed. R. and her mother attempted to report the attack to the police, but no action was taken. A little while later, an acquaintance invited R. to attend several parties at a house. Soon after, the acquaintance threatened that R. had to keep returning to the house or her family would be killed. At the house, R. was forced to have sex with various men. She was also forced to take drugs. R. was trapped in this situation for about two years; until she met her current partner B in 2017. B. encouraged R. to report what was going on to the police. Right after making the report, R. and B. fled to San Pedro Sula because they feared retaliation and began living with R.'s sister for a few months. Still feeling unsafe, R. and B. left for another town in August 2017 and within about a week later, R.'s sister was murdered. In mid-2018, R. was outside of her home when men with guns yelled at her to stop and chased her to her home. Feeling there was nowhere safe

anywhere in Honduras, R., B., and their young son decided to flee to the United States in the spring of 2019. The family was placed in the MPP “Remain in Mexico” process. While waiting in Mexico, they were kidnapped for about a month. Once they escaped, they entered the United States and timely applied for asylum on December 3, 2019. All affidavits and supporting materials to the family’s case will be due 30 days prior to their individual merits hearing in 2022.

- 8. *P. is a woman from Honduras. Her daughter A. is a derivative on her application. P.’s individual merits hearing is on January 17, 2023. P. and her children speak Spanish and live in Southcentral Wisconsin. (18-0128597) (18-0128605)***

When P. 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 impoverished family. Soon after the birth of their children, T. 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. T. continued to threaten her, and P. saw that the police were unwilling to protect her. P. fled to the United States with her young daughter. Her minor sons fled to the United States later as unaccompanied children and NIJC is representing them in their asylum cases before the asylum office. NIJC timely filed P.’s application for asylum with the immigration court. All affidavits and supporting materials will be due 30 days prior to her merits hearing.

- 9. *J. is a young woman from Honduras. Her son, D., will be a derivative on her asylum application. Their Master Calendar hearing was cancelled due to the Covid-19 pandemic and has not been rescheduled. J. speaks Spanish and lives in a western suburb of Chicago, IL. (20-0140744) (20-0142504)***

J. endured many years of physical, emotional, and sexual abuse by her ex-husband in Honduras. When J.’s ex-husband discovered J. was pregnant with their son, he punched her in the stomach. During one incident after D.’s birth, J.’s ex-husband became angry with J. and he shot her in the leg, and hit her in the head with his gun. J. reported this incident to the police, but J.’s ex-husband was never forced to appear in court. About one year later, in 2015, J. was able to escape and come to the United States with her son, but her ex-husband has continued to look for her and threaten her even though J. divorced him. NIJC filed a skeletal asylum application for J. Because this application was filed more than one year after J. entered the United States, her pro bono attorneys will need to argue that she merits an exception to the one-year filing deadline for asylum. NIJC will assist them in making this argument. All affidavits and supporting materials will be due 30 days prior to her merits hearing, which has not yet been scheduled.

- 10. *R. is a young woman from Mexico. She has not yet been scheduled for her first Master Calendar Hearing. R. speaks Spanish and lives in Northeastern Illinois. (21-0149849)***

R. lived with her mother in Mexico until she was around eight years old. At the time, her mother had a new partner who sexually abused R. When R. told her mother about the sexual abuse, her mother claimed R. was lying and hit her. R. then went to live with her maternal grandparents and uncle. When R. was approximately 12 years old, her uncle started to rape her daily. R. told her grandmother, but her grandmother did not believe her. When R. was about 14 years old, her grandfather started molesting her. In addition, R. was malnourished because her grandmother would become upset when R. ate in the house. She did not eat more than one meal per day, and sometimes she did not eat at all. Given all of the abuse she experienced, and without anyone to protect her, R. fled to the United States in spring 2021 and was designated as an unaccompanied child before being released to family in Illinois. As a previously designated unaccompanied child, the asylum office has initial jurisdiction over her case even if R. is scheduled for an immigration court hearing. USCIS must receive R.'s skeletal asylum application by May 5, 2022. Affidavits and other supporting documents will be due one week prior to her interview at the asylum office, which may occur as soon as four – six weeks after the skeletal application is filed.

### **Asylum: Based on Gender Identity or Sexual Orientation**

*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.*

***11. S. is a transgender woman from Guatemala. She lives in Elgin and speaks Spanish. Her merits hearing is on September 23, 2022. (19-0135417).***

S. began identifying as a woman when she was a child. Her parents physically abused her and then disowned her, forcing her to live in an orphanage. She was physically and sexually abused at the orphanage. She survived multiple instances of physical assaults as a teenager, including with a machete and acid. In 2021, after other trans women were killed in Guatemala, S. fled to Mexico where she lived for about four years. In Mexico, she was kidnapped and raped in 2016. She escaped from her kidnappers and fled to the U.S. S. entered the country in November 2016. She was detained at the border and then released. She came to Chicago because she had a contact here. NIJC filed her asylum application in August 2019. Since she did not apply within one year of her entry, her pro bono attorneys will need to argue an exception to the one year filing deadline and NIJC can assist with that. She started hormone replacement therapy in 2018, and that is an argument for changed circumstances. Her affidavit and other supporting documents will be due 45 days prior to her merits hearing which has been set for September 23, 2022.

### **Asylum: Based on Political Opinion, Religious Beliefs, or Opposition to Criminal Organizations**

*Asylum claims based on political opinion or religious beliefs represent the stereotypical asylum case and are often more straightforward 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.*

***12. D. is a young woman from Honduras. She speaks Spanish and lives in Northcentral Indiana. (21-0149700) \*Urgent\****

D. was raised in Honduras by her father and her step-mother, since her mother abandoned her as a young child. D.'s father worked for an electrical company and ordered the power to be shut off in a neighborhood where gang members lived. Gang members then threatened to kill her father if he did not turn the power back on and pay an extortion fee to the gang. After D.'s father refused to comply with the gang's demands and disappeared, D. witnessed gang members murder her step-mother in January 2021. The gang members threatened to kill D. if she reported them to the police. A week later, the gang members began contacting D. by telephone, asking for her father's whereabouts, and threatened to kill D. if she did not turn him over. She then fled Honduras in February 2021. D. entered the United States as an unaccompanied minor and was detained at a shelter. Her former attorney filed her I-589 with USCIS before she turned 18 years old while she was still detained. D. is currently awaiting her asylum interview with USCIS. Affidavits and other supporting documents will be due one week prior to her interview at the asylum office.

***13. S. is a man from Mexico. His wife, B. and his daughter, L. will be derivatives on his application for asylum, and are also independently eligible for asylum. There are awaiting the rescheduling of their merits hearing. S. and his family speak Spanish and live in Chicago, Illinois. (20-0142082) ((20-0142238) (20-0142239)***

In 2018, armed cartel members threatened to kill S. and his family. They demanded that S. and his siblings join the cartel. The armed cartel members also threatened to rape the women in their family if they refused. S.'s brother fled Mexico and S. was then targeted by the cartel to disclose his brother's whereabouts. Fearing further attacks from the cartel, S. and his family fled to the United States in January 2019. S. and his wife, B. filed their applications for asylum pro se. NIJC filed L.'s independent application for asylum after her one-year deadline. Because L.'s application was filed more than one year after L. entered the United States, her pro bono attorneys will need to argue that she merits an exception to the one-year filing deadline for asylum. NIJC will assist them in making this argument. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled. This family was previously scheduled for a merits hearing in August 2021, but the hearing was continued so that the family could obtain pro bono counsel. The new merits hearing could be scheduled for date as early as late 2021.

***14. T. is a man from Mexico. His wife, R. and their four children, C., Z., A., and M., are derivatives on his asylum application and also independently eligible for asylum. They are awaiting the rescheduling of their merits hearing. The family speaks Spanish and lives in Chicago, Illinois. (20-0140260) (20-0140262) (20-0140264) (20-0140265) (20-0140266) (20-0140267)***

T. was a landowner and vocal advocate against cartel activity in his community. In August 2018, Guerreros Unidos cartel members demanded that T. join their cartel and allow them to take over his family's land, but T. refused. In November 2018, the heavily armed cartel members threatened and beat T. After T. escaped to a neighboring village, cartel members threatened T.'s wife, R. and demanded to know where he was. T. and R. left with their children and fled to the United States shortly afterwards. Since then, cartel members have ransacked T.'s family home and have taken over T.'s family land. T. filed a timely, pro se asylum application in July 2019. All affidavits and supporting materials for the family's case will be due 30 days prior to their merits hearing. This family was previously scheduled for a merits hearing in September 2021, which was rescheduled at T.'s request to allow him time to obtain pro bono counsel. A new hearing may be scheduled for as soon as late 2021 or early 2022.

***15. L. is a man from Honduras. L.'s next Master Calendar hearing is on December 1, 2021. L. speaks Spanish and lives in a southwestern suburb of Chicago. (20-0142467)***

In 2018, L. was living with his former partner, D., when she began to receive threatening text messages from her ex-husband. Within a few days, D.'s ex-husband murdered her. Soon after, L. began to receive threatening messages from men associated with D.'s ex-husband. These men also started to intimidate L.'s family while they were looking for him. L. assisted D.'s family in making a police report about the murder, but nothing significant came of it and police even tried to blame L. for D.'s death. L. fled Honduras about a month after D.'s death, fearing that the same people who killed her would come for him next. L. filed a pro se application for asylum with the immigration court in 2020. Because this application was filed more than one year after he entered the United States, L.'s pro bono attorneys will need to argue that he merits an exception to the one-year filing deadline for asylum. NIJC will assist them in making that argument. All affidavits and supporting materials to L.'s case will be due 30 days prior to his individual merits hearing, which has not yet been scheduled.

***16. K. is a woman from El Salvador. K.'s individual merits hearing is March 31, 2022. K. speaks Spanish and lives in central Indiana. (21-0146239)***

The leader of the local Mara Salvatrucha (MS) gang stalked K. at her place of employment, kidnapped her, and attempted to rape her. When K. resisted, the gang leader punched her. The gang leader later told K. that she had to quit her job and leave with him. He threatened to kill K. if she did not comply. Fearing for her life, K. fled to the United States. Several years later, the gang leader began contacting K. and her husband in the United States. The gang leader believes that K. is to blame for the arrest of a fellow gang member in Indiana. Gang members continue to contact K. and her husband to threaten them. Since her application was filed more than one year after entering the United States, her pro bono attorneys will need to argue that she meets an exception to the one-year filing deadline for asylum eligibility. NIJC will assist them in making this argument. All affidavits and supporting materials to her case will be due 30 days prior to K.'s individual merits hearing.

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

When L. was about 14 years old, the Mara 18 (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 L. on the street and tried to hit him. His companion told him to stop, but the next day, the gang member went to L.'s home, flashed his gun, and told L. to leave by morning or he would kill him. L. left Guatemala immediately and entered the United States. 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 30 days prior to his individual merits hearing in 2022.

***18. F. is a man from Somalia. His merits hearing is on June 24, 2022. F. lives in Chicago and speaks Somali. (20-0145316)***

When F. returned to Somalia after studying at a university in Ethiopia, Al-Shabaab repeatedly threatened him and accused of being an infidel and a spy. Even after F. tried to relocate, Al-Shabaab found him and continued to threaten his life. An immigration judge previously granted F. withholding of removal while he was detained and pro se, but denied him asylum as a matter of discretion solely because the judge disliked the fact that F. had traveled through multiple countries before reaching the United States. After F. appealed the asylum denial to the Board of Immigration Appeals (BIA), the BIA granted the appeal and remanded to allow the court to conduct further fact-finding on the discretionary determination. Because the government did not appeal the withholding grant, that decision is not at issue on remand. With asylum, F. will have a path to citizenship in the United States, but with only a grant of withholding, he will not be able to obtain permanent status. F.'s attorneys will need to prepare additional evidence to support a positive discretionary grant prior to his merits hearing, which has not yet been scheduled.

***19. L. is a woman from El Salvador. Her sons, F. and N., are derivatives on L.'s application for asylum. L., F., and N.'s merits hearing is on 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 L.'s store. Not wanting to support the gang, L. 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 the gang 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., F., and N.'s applications for asylum with the immigration court in 2019. All affidavits and supporting materials to L.'s case will be due 30 days prior to their individual merits hearing in 2023.

**20. B. is a woman from El Salvador. Her children W. and D. are derivatives on her application for asylum and are also independently eligible for asylum. B.'s merits hearing is on July 20, 2023. 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, J., selling fruit in a market. J.'s daughter did not support the relationship. J.'s daughter's boyfriend is a Mara 18 gang member. When J. came to the United States, B. was left alone to run the business. Soon after, Mara 18 gang members took control of B.'s home and began extorting her business. The boyfriend of J.'s daughter and two other Mara 18 gang members kidnapped B. and gang raped her, taking photos to send to J. 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. B. fled 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 argue that they merit 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 30 days prior to their merits hearing in 2023.

**21. B. is a man from Guatemala. He is currently awaiting the rescheduling of his next Master Calendar Hearing. B. speaks Spanish and lives in Kentucky, near the border with southern Indiana. (20-0142513)**

B. was a member of a human rights group in Guatemala that protested mining projects and advocated for the rights of agricultural workers in his village. In 2019, Guatemalan police came to B.'s home and threatened to kill him if he continued his involvement with this group. Soon after, police kidnapped and detained B. for about a day and a half, during which time they beat him and interrogated him about his participation with the group, telling him that if he continued to defy them he would not survive. Fearing for his life, B. fled to the United States as soon as he was released from police custody. B. filed his application for asylum with the immigration court in 2019. Due to a previous deportation, B. is not eligible for asylum, but remains eligible for withholding of removal and protection under the Convention Against Torture. All affidavits and supporting materials to B.'s case will be due 30 days prior to his individual hearing, which has not yet been scheduled.

**22. X. is a man from Honduras. His daughter, I. is a derivative on his application for asylum and is also independently eligible for asylum. X. and I. are awaiting the rescheduling of their next Master Calendar hearing. X. and I. speak Spanish and live in Chicago, Illinois. (20-0143463) (20-0143713)**

X. is an indigenous man from Honduras who owned land and fought for environmental rights in his community. A criminal organization took note of X.'s work and began forcibly recruiting him and demanding he give up the rights to his land. During the same period, X. participated in a national campaign with other members of the Council of Popular and Indigenous Organizations of Honduras (COPINH) to protest the construction of a hydroelectric dam that would have

disenfranchised indigenous landowners. The Honduran police began threatening X. for his participation in this campaign and demanded that he stop opposing the construction of the dam. The criminal organization that previously attempted to recruit X. also began threatening him for his participation in the campaign, leading X. to believe that the criminal organization was working with the police to put down the protests. X. fled to the United States with his daughter, I., in 2019. NIJC timely filed X. and I.'s applications for asylum with the immigration court. All affidavits and supporting materials to their case will likely be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

***23. R. is a man from Mexico. His wife, L., and his daughter, B., will be derivatives on his application for asylum, and are also independently eligible for asylum. R. and his family speak Spanish and live in Chicago, Illinois. (19-0138307) (19-0138308) (19-0138311)***

R. and his family lived in a rural community in central Mexico. In early 2019, members of the La Familia Michoacana, a Mexican drug cartel, shut down the electricity in R.'s village and sent messages to the residents informing them that the area was now under the control of the cartel. Cartel members started arriving at R.'s home and forcibly taking food and supplies from his family. Shortly after, members of the cartel began approaching R. and asking him to work for them. R. refused the requests of the cartel each time. Cartel members then attempted to kidnap L. and B. while they were on their way to B.'s school. Fearing further attacks from the cartel, R. and his family fled to the United States. Although R. and his family 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 R., L., and B.'s skeletal applications for asylum with USCIS in April 2020. All affidavits and supporting materials for the family's case will be due one week prior to their interview at the asylum office, unless their NTAs are filed with the immigration court.

***24. P. is a man from Mexico. His wife S. and his three daughters, E., G., and R. will be derivatives on his application for asylum, and they are also independently eligible for asylum. P. and his family speak Spanish and live in Chicago, Illinois. (20-0142076) (20-0142077) (20-0143342) (20-0143343) (20-0143344)***

In Mexico, P. worked for a bank. In 2018, a known member of a large drug cartel came to P.'s bank and demanded that P. open a bank account for him. P.'s bank would not approve the new account, and the cartel member became furious with P. Afterwards, the same cartel member started threatening P. and other members of the cartel contacted P. demanding money. Out of fear, P. left his job and relocated to another town, but he was unable to support his family and eventually resumed working at the bank. Despite his attempts to keep a low profile, the cartel continued to target and threaten P. and his family. Fearing escalating attacks from the cartel, P. and his family fled to the United States. Although P. and his family 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 P., S., E., G., and R.'s skeletal applications for asylum with USCIS in September 2020. All affidavits and supporting materials for the family's case will be due one

week prior to their interview at the asylum office, unless their NTAs are filed with the immigration court.

**25. R. and L. are a husband and wife from Honduras. Their children, P. and T., will be derivatives on their applications for asylum. The family is waiting for their next Master Calendar hearing to be rescheduled. R., L., P., and T. speak Spanish and live in Chicago, Illinois. (19-0138764) (19-0138767) (19-0139752) (19-0139755)**

R. owned a dental practice in Honduras and L. worked as a teacher. In early 2019, members of the Mara 18 (M18) gang started extorting L. and her son and threatening to kill them if they did not pay. When L. refused the gang's demands, gang members began threatening R. and threatening to kill the entire family if they continued to refuse to pay extortion fees to the gang. R. reported the threats to the police in Honduras, but the police did not investigate and the family was unable to obtain protection from the gang. Fearing for their lives, R., L., and their two daughters fled to the United States in 2019. NIJC timely filed the family's asylum applications. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

**26. F. is a man from Mexico. His wife, C., and their children, T. and R., will be derivatives on his application for asylum and are also independently eligible for asylum. The family is waiting for their next Master Calendar hearing to be rescheduled. F. and his family speak Spanish and live in Chicago, Illinois. (20-0143334) (20-0143335) (20-0143338) (20-0143339) (20-0143340)**

F. and his eldest son, T., were working together at their wood mill in Mexico when members of a cartel approached them and demanded that T. start working for them. F. refused to let the cartel take his son, and told the cartel members that T. wanted to remain with his family and earn an honest living. Soon after, the cartel members threatened to kill the entire family and kidnap T. if he did not work with them. The cartel gave the family two days to decide, and F. chose to flee with his wife and children. F., C., T., and R. entered the United States in December 2019. NIJC timely filed their applications for asylum. All documentation to F., C., T., and R.'s cases will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

**27. P. is a young man from Honduras. P. speaks Spanish and lives in Milwaukee, Wisconsin. (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 in March 2017, fearing that the gang would force him to participate in worse activities or kill him if he refused. Upon his entry into the United States, 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 so P. is not yet in removal proceedings. As a previously designated unaccompanied child, the asylum office has initial jurisdiction over his case. NIJC filed P.'s asylum application with the asylum office, but because it was filed more than a year after he

entered the United States, P.'s pro bono attorneys will need to argue that he merits an exception to the one-year filing deadline. NIJC will assist his pro bono attorneys in making that argument. P.'s 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.

***28. M. is a man from Ecuador. He is currently awaiting the rescheduling of his next Master Calendar hearing date. M. speaks Spanish and lives in Chicago. (20-0145604)***

M. owned a small business in Ecuador where people could pay to use computers and printers. His shop was located near the local market where corrupt police officers frequently forced vendors to pay them in order to sell there. Around August of 2018, two officers left behind a flash drive after using computers in M.'s store. After they left, M. opened the flash drive and discovered evidence of the overcharging of market vendors. When the officers came back to retrieve the flash drive, they warned M. that he would have problems if he had looked at the contents of the flash drive and spoke out against them. Afterwards, M. began to receive threats from the police and a gang affiliated with the police. Around January of 2019, gang members kidnapped M. and took him to a remote location where they beat him and took his money. After this incident, M. fled the country, but people continued to come to his shop looking for him and threatened to harm his girlfriend and daughter, which led them to flee as well. NIJC filed M.'s asylum application with the immigration court in April 2021. Although M. is past his one-year filing deadline, he merits an exception to the deadline and NIJC will assist his attorneys in making this argument. All affidavits and supporting materials to M.'s case will be due 30 days prior to his individual merits hearing, which has not yet been scheduled.

***29. J. is a man from El Salvador. His son, D., is a derivative on J.'s application for asylum and also has an independent claim. Their next Master Calendar Hearing is on April 13, 2022. J. and D. speak Spanish and live in Indianapolis. (20-0143863) (20-0143876)***

J. owned a car painting business in El Salvador. Soon after he opened his business, members of the Mara Salvatrucha (MS-13) gang began demanding that he pay them every couple of weeks. They threatened to kill him and his family if he did not obey. J. paid the MS-13 on a regular basis for almost eight years, but it became more difficult over time to make the payments. At some point, J. told MS-13 members that he would have to stop paying them. Around this time, J.'s son, D., and his stepdaughter, A., were walking home when a man attempted to kidnap them. J. closed his business and he and his son D. fled to the United States. J. timely filed his asylum application with the immigration court in July 2020. NIJC filed D.'s independent asylum application with the immigration court in January 2021. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

***30. V. is a woman from Honduras. Her children C. and T. are derivatives on her application for asylum and are also independently eligible for asylum. They are waiting for their Master Calendar hearing to be rescheduled. The family speaks Spanish and live in Chicago, Illinois. (20-0143706) (20-0145601) (21-0145598)***

V.'s former partner, K., is a gang member in Honduras. During their relationship, he physically and sexually abused K., tried to force her to have an abortion, and threatened to kill her if she ever left him. He also abused V's children and tried to force her son to join his gang by threatening to kill V. and her children if he refused. Gang members also attempted to extort V. by threatening to kill her and her children if she refused. V. and her daughters fled to the United States in late 2018. NIJC filed V., C., and T.'s applications for asylum with the immigration court, but because their applications were filed more than one year after they entered the United States, their pro bono attorneys will need to argue that V., C., and T. merit an exception to the one-year filing deadline. NIJC will assist them in making this argument. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled. V.'s son L. entered the United States as an unaccompanied child and as a result, his case was in a different procedural posture. NIJC filed his asylum application with USCIS and USCIS granted him asylum in May 2021, which should be helpful when presenting the case of his mother and sisters.

***31. T. is a woman from Honduras. Her daughter, S., is a derivative on her application and is also independently eligible for asylum. Their next Master Calendar Hearing is scheduled for December 15, 2022. T. and S. speak Spanish and live in Northcentral Indiana. (20-0143517) (20-0143534)***

T. and her daughter S. were both subjected to gender violence by family members, including an uncle and S.'s father. T. married S.'s father X. in 2010 and X abused T. and S. throughout the relationship. In 2017, T. and S. moved to T.'s mom's house after a particularly brutal incident of abuse. While there, X. sent gang members to watch T. and track her movements. Under pressure from his family, X. agreed to a divorce, but warned T. that she was still his woman, that he would never let her leave, and that he would take S. from her if she ever remarried. T. reported the abuse to the police, but received no protection. T. and S. fled Honduras in 2019. NIJC filed T. and S.'s applications for asylum with the immigration court in August 2020. Because these applications were filed more than one year after T. and S. entered the United States, their pro bono attorneys will need to argue that they merit an exception to the one-year filing deadline for asylum. NIJC will assist them in making this argument. All affidavits and supporting materials for T. and S.'s case will be due 30 days prior to their individual hearing, which has not yet been scheduled.

***32. R is a woman from Venezuela. Her next Master Calendar Hearing is scheduled for November 10, 2022. R. speaks Spanish and lives in a western suburb of Chicago. (21-0145778)***

R. worked as an attorney for a government-run company for many years. R. was responsible for monitoring projects and partnerships to ensure legal compliance. Her supervisor was vocally pro-government, while R. was part of the opposition. In 2014, R. discovered significant irregularities while working on a project, but her supervisor warned her not to interfere because of the political affiliations of the people involved. In 2019, R. began to receive threatening phone calls, her car was repeatedly vandalized, and her supervisor continued to act very hostile and threatening way towards her. At the end of April 2019, a suspicious car followed R. to her apartment. Shortly thereafter, somebody shot a bullet through her window. After this, R. fled to

the United States. She timely filed for asylum in February 2020, but the asylum office referred her case to the immigration court. All affidavits and supporting materials to R.'s case will be due 30 days prior to his individual merits hearing, which has not yet been scheduled.

***33. S. is a woman from El Salvador. She and her son, J. are awaiting a new Master Calendar Hearing date. S. and J. speak Spanish and live in a western suburb of Chicago. (21-0146760) (21-0147488)***

S.'s step-father abused her throughout her childhood. The father of S.'s first child beat and raped her. He prohibited her from studying or working outside the home. The abuse worsened when S. found a radio job. S. developed severe anxiety and depression. The father of her child admitted her to a psychiatric hospital and told staff she was crazy. While at the hospital, a nurse raped S. multiple times, leading to the birth of her second child, J. Later, S. worked as a television reporter. Her boss routinely sexually harassed her, forced her to report on violent, gang-related stories, and used his connections to highly ranked gang members to intimidate her against reporting him. After S. reported his treatment, members of the Mara 18 gang threatened her outside of her home, saying there would be consequences if she spoke out. In early 2019, gang members attacked and beat her brother. Soon afterwards, S. fled to the United States with her son. NIJC filed S.'s asylum application with the immigration court. Because this application was filed more than one year after S. entered the United States, her pro bono attorneys will need to argue that she merits an exception to the one-year filing deadline for asylum eligibility. NIJC will assist them in making this argument. All affidavits and supporting materials to S.'s case will be due 30 days prior to her individual merits hearing, which has not yet been scheduled.

***34. A. is a woman from Guatemala. Her four children are derivatives on A.'s application for asylum. A. and her son B. do not currently have a future hearing date scheduled. Her eldest daughter C. has an independent asylum case at the asylum office and her next Master Calendar scheduled for October 6, 2021. Her two youngest daughters recently arrived as unaccompanied minors and are not yet scheduled for court. The family speaks Spanish and live in central Illinois. (20-0143124) (20-0143123) (20-0143125) (21-0148945) (21-0148946)***

A's partner abused A. and their children, raped A., and controlled her church attendance. He became particularly violent after she gave birth to their second daughter because he was angry the child was a girl. As a result of the abuse, A. has long-term hearing loss. A.'s partner forced her daughter C. to scavenge for food at a local dump, attempted to sell C. to a drug trafficker, and threatened to rape C. When A. moved with her children to another part of Guatemala, her partner found them and threatened to kill them with the help of his drug trafficking associates. Because A. and her son filed for asylum after their one-year deadline, her pro bono attorneys will need to argue that she merits an exception to the one-year filing deadline for asylum eligibility. NIJC will assist them in making this argument. All documentation to their cases will be due 30 days prior to their individual merits hearing, which has not yet been scheduled. Documentation in C's case will be due one week prior to her asylum interview. The timing of the interview is uncertain.

**35. A. is a woman from Honduras. Her daughter, B., will be a derivative on A.'s application for asylum. Their next Master Calendar hearing is on May 5, 2022. They speak Spanish and live in northern Illinois. (21-0146245) (21-0146246)**

As a child, an older cousin raped A. As a young woman, A's partner physically and verbally abused her over the course of several years. Once separated from her abusive partner, an armed MS-13 gang member demanded she become his girlfriend since she no longer had a husband. The MS-13 gang member threatened he would take her young daughter if A. refused. A. and B. fled Honduras in 2019. NIJC filed their asylum applications with the immigration court, but because they will file more than one year after their arrival, A.'s pro bono attorneys will need to argue that they merit an exception to the one-year filing deadline. NIJC will assist them in making that argument. All documentation to their cases will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

**36. L. is a woman from Venezuela. She is awaiting a new Master Calendar hearing date. L. speaks Spanish and lives in Chicago. (21-0147034)**

L. owned and operated a textile factory in Venezuela. She was also an active member of the opposition party, Primero Justicia. L. participated in many marches and protests with the party. Starting in around 2016, L. received several threats at her factory. Members of a "colectivo," an armed pro-government group, came to her factory and told her that she had to pay them in order to support the revolution. She paid what they requested so that they would leave and reported this to the police afterwards. Not long after, the colectivo requested even more money. L. eventually had to close her business completely, but even after closing the business, she continued to receive threats from the colectivo. On several occasions, colectivo members came by her house on motorcycle shouting her name and firing guns into the air. L. came to the United States in 2018 on a tourist visa, hoping she could return to Venezuela, but soon realized it was best to stay and seek asylum after her daughter reported that colectivo members continued to come to her home looking for her. L. timely filed for asylum with USCIS in 2019 but her case was referred to the immigration court. All affidavits and supporting materials to L.'s case will be due 30 days prior to her individual merits hearing, which has not yet been scheduled.

**37. J. is a woman from Honduras. Her son, N., is a derivative on her application and is also independently eligible for asylum. Their next Master Calendar Hearing is scheduled for February 4, 2022. They speak Spanish and live in Indianapolis, IN. (21-0145602) (21-0145603)**

As a child, J. lived with an aunt and uncle. The uncle molested her and her aunt verbally abused her and forced her to work. When she was around 13 years old, J. moved in with a different aunt in a small community where she lived and studied for several years. During this time she had her first child, N. One night in 2019, an armed man stopped J. while she was walking home, took her to a cemetery, and he raped her. He threatened her not to tell anyone what he had done and indicated that he knew she had brothers and another child. She believes that he was affiliated with a gang because in her community, only gang members have guns. J. did not tell anyone about the rape, but lived in fear and felt like people were watching her. A couple of months later, she realized that she was pregnant from the rape and decided to flee because she

feared that the man who raped her would come after her if he found out about the pregnancy. J. filed her asylum application with the court in December 2020. Since this application was filed more than one year after J. entered the United States, her pro bono attorneys will need to argue that she merits an exception to the one-year filing deadline for asylum eligibility. NIJC will assist them in making this argument. All affidavits and supporting materials to J.'s case will be due 30 days prior to her individual merits hearing, which has not yet been scheduled.

***38. R. is a woman from El Salvador. Her son, A. will be a derivative on her application. R. and A.'s next Master Calendar hearing has not been scheduled. R. speaks Spanish and lives in a northern suburb of Chicago, IL. (21-0147562) (21-0147563)***

During much of their relationship, R.'s ex-partner and father of her children, H., was verbally, physically, and sexually abusive. H. was a police officer in El Salvador. For some time, H. was able to hide his status as a police officer from the community and 18<sup>th</sup> Street gang members. Eventually, gang members took notice of his role. They began calling the family and sending pictures of R.'s daughter threatening to kill the family if R. and H. did not pay the extortion fees. Although R. and her family repeatedly tried to relocate to other towns in El Salvador, the gang members continued to find them and targeted R.'s son A. for being the son of a police officer. H. fled to the United States and was granted asylum, but the gang continued targeting the family, particularly A., making it impossible for them to leave their home. Finally, R. fled to the United States with A. in late 2019. NIJC will file R. and A.'s skeletal asylum applications with the immigration court. Since their application will be filed more than one year after entering the United States, their pro bono attorneys will need to argue that they meet an exception to the one-year filing deadline for asylum eligibility. NIJC will assist them in making this argument. All affidavits and supporting materials for R. and A.'s case will be due 30 days prior to their merits hearing, which has not yet been scheduled.

***39. E. is a man from Guatemala. His children D. and S. are derivatives on his application and are also independently eligible for asylum. They are waiting for their next Master Calendar hearing date. E. and his family speak Spanish and live in a southwestern suburb of Chicago, IL. (20-0141236) (20-0141259) (20-0141261)***

E. began working as a taxi driver in 2018. Shortly after, members of the MS-18 gang began to threaten and extort him and his co-workers. They obtained his personal number and would call threatening to kill him and his family if he did not pay them. They began killing multiple of E.'s co-workers for failing to pay, and threatened to kill E. if he reported the murders or stopped paying as well. The payments and threats continued to increase, so E. decided to flee to the United States in November 2018. The gang had also begun threatening D. E. timely filed his application for asylum pro se in May 2019. NIJC filed individual applications for D. and S. in January 2021. All affidavits and supporting materials to E.'s case will be due 30 days prior to his individual merits hearing, which has not yet been scheduled.

***40. R. is a woman from Honduras. She is waiting for her next Master Calendar hearing date. R. speaks Spanish and lives near Indianapolis, IN. (21-0146095)***

R.'s partner was a member of the gang Mara 18. Soon after they started living together, her partner became controlling and abusive. He would not allow her to leave the house to see her family. He beat and raped her often. He told her that she had to stay with him, and threatened to hurt and kill her if she tried to leave the relationship. She reported him to the police once, but nothing came from it. She was also involved in the Libre political party and attended protests regularly over the course of several years. Police shot at, beat, and tear-gassed her and fellow party members at many protests. She fled the country and traveled to the United States in 2019 to escape the dangerous political climate and free herself from her abusive partner. R. timely filed her asylum application with the immigration court in 2019. All affidavits and supporting materials to R.'s case will be due 30 days prior to her individual merits hearing, which has not yet been scheduled.

***41. N. is a woman from Honduras. N. speaks Spanish and lives in a suburb of Indianapolis, IN. (21-0147272)***

N.'s third child's father was abusive and controlling. He raped N. and told her he would not let her end the relationship. When N. became pregnant and refused to get an abortion, he threatened to kill her and the child. Out of fear, N. fled to the United States in late 2020, but at the border N. was placed in the Migrant Protection Protocols (MPP or "Remain in Mexico") program and was prevented from entering the United States to seek asylum. N. subsequently entered the United States and gave birth to her third child. Although N. was issued a Notice to Appear (NTA) at the border, it has not yet been filed with the immigration court. Unless and until her NTA is filed with the court, USCIS retains initial jurisdiction over her application for asylum. USCIS must receive N.'s asylum application by November 24, 2021. N.'s affidavits and supporting documents will be due one week prior to her interview, which will likely occur about 1-2 months after her application is filed.

***42. J. is a woman from El Salvador. She is waiting for her merits hearing to be scheduled. J. speaks Spanish and lives with her partner and two U.S. citizen children in Northcentral Indiana. (21-0148122)***

J.'s mother physically and emotionally abused J. throughout her childhood. When J. was about 16 years old, she lived on the border between rival gang territories. MS-13 gang members accused her of passing information to the rival gang. A group of about ten armed gang members surrounded her and threatened to kill her if she did not leave within 24 hours. J. went to a different city to report the incident to the police, but was still scared of violent repercussions from the gang and fled to the United States soon after. At present, the MS-13 gang regularly extorts J.'s family in El Salvador and has threatened J. with harm if she returns. J. entered the United States as an unaccompanied child in fall 2016. She filed for asylum at the asylum office with other counsel in June 2019, but her case was referred to the immigration court in March 2021. Since her application was filed more than one year after entering the United States, her pro bono attorneys will need to argue that she meets an exception to the one-year filing deadline for asylum eligibility. NIJC will assist them in making this argument. All affidavits and supporting materials for J.'s case will be due 30 days prior to her merits hearing, which has not yet been scheduled.

**43. V. is a woman from Guatemala. Her son X. will be a derivative on her application. The family speaks Spanish and lives in a western suburb of Chicago, IL. (21-0148257) (21-0148864)**

When V. was young, her father was killed and her mom moved to the United States, leaving V. and her younger sisters with an aunt who physically abused them. When V. and her sisters moved to a different aunt's home, another family member who was involved with a gang threatened the girls with violence and made sexual advances towards them. V.'s two sisters fled to the United States and were granted asylum, but V. stayed in Guatemala. When she was 17 years old, V. was in a relationship with a man who began to verbally and physically abuse her once he knew of her pregnancy. He tried to force V. to have an abortion. Living in her partner's home, his family members also abused her, eventually causing her to be hospitalized for several days. About a year later, V. began a relationship with another man. When she confronted this man about being in a relationship with another woman, he punched her in the face and stomach, causing her to be hospitalized for about two weeks. Soon after, V. fled to the United States with her eldest son and later gave birth to her second child in the United States. Although V. and her son were issued a Notice to Appear (NTA) at the border, their NTAs have not yet been filed with the immigration court. Unless and until their NTAs are filed with the court, USCIS retains initial jurisdiction over their asylum applications. USCIS must receive their individual asylum applications by March 10, 2022. V. and her son's affidavits and supporting documents will be due one week prior to their interview, which will likely occur about 1-2 months after their applications are filed.

**44. O. is a man from Haiti. His partner, R., and their son, L., will be derivatives on his application for asylum, and they are also independently eligible for asylum. O. and his family speak Haitian Creole and live in Indianapolis, IN. (21-0148753) (21-0148754) (21-0149461)**

O. was an organizer for a prominent political party in Haiti. While at a party event, men from a rival political party attempted to break up the event, threatening O. with machetes. Around that same time, armed individuals from a rival party tried to run O. off a road. Later, the family's home was burned to the ground. Fearing for their lives, O., R., and L. fled to the United States in 2021. Although O., R., and L. were issued Notices to Appear (NTA), the Department of Homeland Security (DHS) has not filed the NTAs with the immigration court, so O., R., and L. are not yet in removal proceedings. Unless and until DHS files the NTAs with the court, USCIS maintains jurisdiction over any asylum applications they file. USCIS must receive their skeletal asylum applications by March 19, 2022. Affidavits and other supporting documents will be due one week prior to their asylum interview, which may occur as soon as four – six weeks after the skeletal application is filed. O., R., and L. are independently eligible for Temporary Protected Status (TPS). NIJC will handle their TPS applications.

**45. V. is a young woman from Honduras. V. speaks Spanish and lives in Indianapolis, IN. (21-0150127)**

V. grew up in Honduras with her mother and older brother. In approximately 2017, members of a local gang murdered her cousin and began threatening members of his family in a

neighborhood near where V. lived. Many members of V.'s family had to flee Honduras as a result of these threats. By spring 2021, the same gang had established control of V.'s neighborhood. One day, gang members passed by V.'s family's house, saw her brother outside, and ordered him to go inside his home. In an act of defiance, V.'s brother refused to go inside, claimed that it was his neighborhood and he could do what he wanted. The gang members mentioned his relation to the cousin who had previously been murdered, brandished their gun, and said that they would kill V.'s brother as well as kill and rape V. if the family did not leave Honduras. As a result of this threat, V. fled Honduras. She entered the United States as an unaccompanied child, and was detained in a shelter. As a previously designated unaccompanied child, the asylum office has initial jurisdiction over her case. USCIS must receive V.'s skeletal asylum application with USCIS by July 3, 2022. Affidavits and other supporting documents will be due one week prior to her interview at the asylum office, which may occur as soon as four – six weeks after the skeletal application is filed.

***46. M. is a woman from Honduras. Her daughter C. is a derivative on M.'s application for asylum and is also independently eligible for asylum. Their next Master Calendar Hearing is scheduled for August 17, 2022. M. and C. speak Spanish and live in Chicago, Illinois. (20-0140502) (20-0140873)***

M. worked as a hair stylist in Honduras. One day on her way home from work, M. witnessed gang members killing a young man. Shortly after, people unknown to M. came to her home and beat her badly. M. made a police report, but everyone in M.'s town told her she had days to leave before something else happened to her. M. believes that the beating is connected to the police report she made, and that the people who attacked her are connected to the gang. Fearing for her life and for the life of her daughter, M. fled Honduras with C. in early 2019. NIJC timely filed M.'s asylum application with the immigration court. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

***47. K. is a man from Honduras. His next Master Calendar hearing is on February 10, 2022. K. speaks Spanish and lives in Chicago, Illinois. (20-0143330)***

K. was part of an opposition political party in Honduras and was very active in the protest movement. In 2015, armed men from the Honduran military kidnapped and beat him. They threatened that he had to leave the country or end his participation in the political party. After K. escaped, he reported the kidnapping and torture to the police. After filing the police report, Honduran military and government officials constantly threatened K. that he had to leave the country. Fearing further attacks, he fled to the United States July 2018. K. filed his application for asylum pro se with the immigration court after the one-year filing deadline. NIJC will assist his attorneys in arguing that he meets an exception to the one-year deadline. All affidavits and supporting materials to their case will be due 30 days prior to their individual merits hearing, which has not yet been scheduled.

***48. J. is a young man from El Salvador. His next Master Calendar Hearing is on March 3, 2022. He speaks Spanish and lives in Northcentral Indiana. (20-0145126)***

The Mara 18 gang regularly extorted J. When J. was unable to pay the extortion fees, a group of gang members showed up at his house and brutally attacked him. Salvadoran police arrested one of the assailants, based on a report by J.'s mother. In retaliation, the gang threatened to kill J. A few days later, the gang members attempted to kill J. by shooting at him on his way to work. J. fled the country shortly after, but the gang continues to threaten him through his mom and is currently threatening to kill his mom and brothers. Because J. filed his asylum application with the immigration court more than one year after entering the United States, J.'s pro bono attorneys will need to argue that he merits an exception to the one-year filing deadline for asylum. NIJC will assist them in making this argument. All affidavits and supporting documents to J.'s case will be due 30 days prior to his 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. 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.*

***49. A. is a 17-year-old boy Guatemala who turns 18 in June of 2022. He speaks Spanish and lives with his older sister in southern Illinois (Randolph County). (21-0149511) \*Urgent\****

A. lived with his mother in Guatemala until he came to the United States in November 2020. A.'s father was an alcoholic and died from complications relating to alcoholism in 2013. Prior to his death, A.'s father would constantly drink, spend all of his money on alcohol and fight with A.'s mother. A. feared his father and witnessed him hit his mother. A.'s father did not support him emotionally or financially. A pro bono attorney will need to file a petition for guardianship on behalf of A.'s half-sister, and obtain an order finding that A.'s reunification with his father is not viable due to his abandonment and that it is not in A.'s best interest to return to Guatemala. A. will be turning 18 in June 2022.

***50. L. and M. are 17 and 14-year-old boys from Guatemala. L. turns 18 in March of 2022. They speak Spanish and live with their mother in Chicago (Cook County). (21-0150535) \*Urgent\****

L. and M.'s father separated from their mother when the minors were infants and did not provide any financial and emotional support since then. Around 2019, L. and M.'s mother arranged for the minor boys to live with their father in order to seek safety from death threats the minors received while living with her in Honduras. Their mother fled to the US and sent money to their father to provide for her sons. For about a year, their father kept the money being sent for their education, and instead forced each minor to work, beat them regularly, and withheld meals. In August 2020, L. and M. fled to the US to escape their father's violence and reunite with their

mother. A pro bono attorney will need to file a petition for sole allocation of parental responsibilities on behalf of L. and M.'s mother, and obtain an order finding that L. and M.'s reunification with their father is not viable due to his abuse and that it is not in their best interest to return to Honduras or Guatemala.

***51. B. is a 17-year-old girl from Honduras who turns 18 in December of 2021. She speaks Spanish and lives with her father in western Illinois (Peoria County). (21-0150590)  
\*Urgent\****

B.'s mother left the family when B. was around nine years old. B.'s mother has not provided her with any financial or emotional support ever since. After the separation, B.'s father arranged for B. to live with her paternal grandparents while he came to the US to find work and provide for his daughter. B. has not seen her mother since she left the family and rarely had any contact with her. In February 2021, B. fled to the United States to escape growing gender-based violence in her community and to reunite with her father. A pro bono attorney will need to file for sole allocation of parental responsibilities on behalf of B.'s father, and obtain an order finding that reunification with B.'s mother is not viable due to abandonment and that it is not in her best interest to return to Honduras.

***52. B. is a 14-year-old girl from Mexico who speaks Spanish and lives with her mother in Northwest Illinois (Whiteside County). (20-0145327)***

B.'s father came to the United States from Mexico in 2018, and has not supported B. since that time. The family believes he lives in California, but his contact with B. has been minimal, and he has provided no financial or other support. B.'s mother came to the United States shortly thereafter, and B. remained in Mexico with her maternal aunts. Due to threats against the family in Mexico, B. also fled to the United States in 2019, and now lives with her mother in Illinois. Her pro bono attorney will need to file a petition on behalf of B.'s mother seeking sole allocation of parental responsibilities for B., and obtain an order finding that B.'s reunification with her father is not viable due to abandonment, and that it is not in B.'s best interest to return to Mexico.

***53. P. is a 16-year-old boy from the Democratic Republic of the Congo (DRC). He speaks French and lives with his uncle in Western Illinois (Morgan County). (21-0148997)***

P. came to the United States in September 2020 to live with his uncle after fleeing violence in the DRC. Political activists in the DRC killed P.'s mother and brother, and P. fled with his father to escape persecution. While travelling to the United States, P. was separated from his father and has not had contact with him since February of 2020. P. is now residing with his uncle in Western Illinois. His pro bono attorney will need to file a petition for guardianship on behalf of P.'s uncle, and obtain an order finding that P.'s reunification with his mother is not viable due to her death (which constitutes abandonment under Illinois law), and finding that it is not in P.'s best interest to return to the DRC.

***54. L. is a 14-year-old boy from Ecuador. He speaks Spanish and lives with his mother in Northern Illinois (Lake County). (21-0150093)***

L.'s mother and father came to the United States in 2007, and L. has no memories of his father. L. was raised by his maternal grandparents in Ecuador. His mother would send money to Ecuador

and speak with him frequently by phone, but his father provided no support. Around 2010, L.'s mother and father separated, though they remained married. L. did not have contact with his father before this and has not had contact since. L. came to the United States in April 2021 to live with his mother, as his grandparents were no longer able to support him due to their age. Although L.'s mother and father were previously married, L.'s mother believes that his father has obtained a divorce from her in Ecuador. A pro bono attorney will need to determine if L.'s parents are divorced, and then either file for divorce or for allocation of parental responsibilities on behalf of L.'s mother. The pro bono will then need to obtain an order finding that L.'s reunification with his father is not viable due to his father's abandonment, and that it is not in L.'s best interest to return to Ecuador.

***55. P. and Q. are 13 and 16-year-old boys from Honduras. They speak Spanish and live with their mother in Chicago (Cook County). (21-0150095)***

P. and Q. have never had a relationship with their father and he is not on their birth certificates. When P. was only about a year old, and before Q. was born, their father abandoned them and their mother. They have since had no contact with their father. In 2019, P. came to the United States with their mother, while Q. stayed in Honduras with their maternal aunt. P. and Q.'s father never emotionally or financially supported them. In 2021, Q. came to the United States to be reunited with his mother and brother in Illinois. A pro bono attorney will need to file a parentage case establishing paternity of P. and Q.'s father on behalf of their mother, and obtain an order finding that P. and Q.'s reunification with their father is not viable due to his abandonment, and that it is not in P. and Q.'s best interest to return to Honduras.

## **U Visas**

***56. G. is a woman from Mexico. G. speaks Spanish and resides in Chicago. G. qualifies for a U Visa because she was the victim of domestic violence, but specifically the crime of criminal sexual assault. G. will require a waiver of inadmissibility. G.'s U Visa petition must be received by USCIS on or before October 5, 2021. (20-0143745) \*Urgent\****

G. was the victim of domestic violence by her husband and father of her children throughout their relationship. On October 13, 2019, G.'s husband came to bed and began to fondle G. G. had asked her husband to stop, but then proceeded to rape her. G. was in a lot of pain and went to the hospital where she spoke with the police and made a report. As a result of her cooperation, her husband was arrested. Following the incident, G. obtained an order of protection. G. has gone to therapy to help her heal from the physical and emotional abuse she suffered. G. has two U.S. citizen children, and she is their primary caretaker.

***57. Y. is a woman from Mexico. Y. speaks Spanish and resides in a suburb of Chicago. Y. qualifies for a U Visa because her minor daughter was the victim of kidnapping, abduction, and abusive sexual contact. Y. has two children who will be derivatives on her application and each person will require a waiver of inadmissibility. Y.'s U Visa petition must be received by USCIS on or before October 6, 2021. (21-0148488) (21-0149433) (21-0149436) \*Urgent\****

Y. was the indirect victim of kidnapping, abduction, and abusive sexual contact directed towards her minor daughter, G. On August 27, 2018, Y. and her children were shopping in a department store when she noticed that G. was no longer in her sight. After Y. and her adult children searched for G., they found her crying and her chest red. G. said that a stranger grabbed her by her wrist and walked her outside the store and proceeded to touch her chest. The family called the police and were escorted to a hospital where a criminal sexual assault kit was collected from G. The offender fled and was never arrested. Y. continued to assist law enforcement by facilitating forensic investigations and remaining in contact, even after changing her address. Y. and G. are attending counseling in order to heal from this traumatic event.

***58. J. is a man from Mexico. J. speaks Spanish and resides in Chicago. J. qualifies for a U Visa because he was the victim of felonious assault. J. will require a waiver of inadmissibility. J.'s U Visa petition must be received by USCIS on or before October 8, 2021. (21-0147332) \*Urgent\****

J. was working at a restaurant when he was robbed at gunpoint. As J. was delivering a pizza, unknown offenders approached him and put a gun to his head, demanding his belongings. J. handed over everything on him. J. stopped working after this incident due to fear. He was afraid that the offenders, who were never caught, would find him again. J. had a preexisting heart condition, which was exacerbated as a result of the incident. J. cooperated with the police and detectives by providing them with information that could lead to the arrest of the offenders. He hopes to move forward with his life in the U.S., without fear.

***59. M. is a woman from Guatemala. She speaks Spanish and resides in Chicago. M. qualifies for a U visa because she was the victim of domestic violence. M. will require a waiver of inadmissibility. M.'s U visa must be received by USCIS on or before October 27, 2021. (21-0149232) \*Urgent\****

M. was the victim of attempted murder by her ex-boyfriend and father of her children, G. G. physically, emotionally, economically and verbally abused M. on various occasions, before and after they separated. G. threatened to kill M. on various occasions if she called the police. On April 21, 1991, during a verbal altercation G. removed a knife from his pants pocket and attempted to stab M. in the abdomen. M. jumped out of the way and used her hand to block the knife, leaving a 2-inch laceration on her left hand. Out of fear for her own life, M. called the police. When the officers arrived, she provided a detailed report of the incident. G. fled the scene before the officers arrived. M. feared that he would return to hurt her, so she had the locks changed. G. came back to the apartment and threatened to break the door in. M. called the police and they arrested G. upon arrival. M. received medical attention for the laceration on her hand and got an order of protection against G. M. has three U.S citizen children for whom she is the primary caretaker.

## **VAWA (LGBT)**

***60. A. is a bisexual woman from England. She speaks English and lives in southern Illinois. (21-0147657)***

A. entered the United States in October 2019 on a visa waiver. She came to visit a woman, N., who she had met online and with whom she had become romantically involved. A. moved with N., as well as with N.'s ex-husband, M., and M.'s two children. N. quickly became verbally and emotionally abusive, demanding that A. cook and clean on a daily basis-- even if she was sick — and threatening to have her deported if she did not. N. used the promise of marriage as a tool to keep A. compliant, promising her to marry her if she did as N. asked, and threatening to report her to ICE if she did not. A. and N. married in August 2020, while A. was staying at a domestic violence shelter. N. physically was violent toward A. on two occasions: once hitting her three times in the head with her hand, and another time pushing her down onto the floor. Pro bono attorneys should anticipate preparing the VAWA petition within the next 8 to 12 weeks.

## **NIJC Announcements**

### **Asylum Updates**

Asylum law and procedure is in flux – don't fall behind! Make sure you're up to speed by reviewing NIJC's [procedural updates](#), [updated asylum manual](#), and new [practice advisories](#).

### **Thinking of Leaving Your Firm?**

When pro bono attorneys leave their firms, it can significantly affect their pro bono matters. If you are thinking of leaving your firm and have an open NIJC pro bono matter, make sure you avoid prejudicing your client by establishing a transition plan with your firm and your client, and notifying your NIJC point-of-contact of your departure. [This guidance](#) can help plan the transition.