

May 18, 2022

## **NIJC Pro Bono Case List: 62 cases need pro bono representation.**

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

### ➤ **Asylum Matters:**

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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)
- **LGBT** cases, contact Olivia Judd at [ojudd@heartlandalliance.org](mailto:ojudd@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)

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 daughter, D., is 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 a teenager. 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 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. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

- 2. D. is a woman from Mongolia. Her husband, J. is a derivative on her application for asylum. She speaks Mongolian and lives in Chicago, IL. NIJC will assist her attorneys in identifying an interpreter. (17-0116073) (19-0132975)***

D. grew up in the Mongolian countryside and moved to the capital, Ulaanbaatar, to attend university. 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.

- 3. *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 15 days prior to her merits hearing, which has not yet been scheduled.

- 4. *S. is a woman from Ecuador. Her son T. and her daughter K. will be derivatives on her asylum application and are also independently eligible for asylum. Their next Master Calendar hearing is on March 17, 2023. S., T., and K. speak Spanish and live in Chicago, IL. (21-0149817) (21-0150532) (21-010530)***

S. married her children's father in approximately 2007. They were married for about five years, during which time he verbally and physically abused S. After they divorced, S. moved in with a new partner. About a year into the relationship, S.'s partner, Y., began to emotionally and physically abuse her, T., and K. constantly. When he was abusive, S. would try to leave the house with her children, but Y. forced them to return. He also threatened to harm S. and the children if she ever tried to report him to the police. After approximately five months of abuse, S. tried to leave the relationship for good, but Y. threatened to harm S., T., and K if they did not return. Fearing what he could do, S. fled Ecuador with T. and K., and they arrived in the United States in the summer of 2021. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

- 5. *R. is a woman from Mexico. Her son, A. will be a derivative on her application for asylum and is also independently eligible for asylum. R. and A. speak Spanish and live in Chicago, IL. (21-0150662) (21-0150806)***

R. lived in Mexico with her ex-partner and three children. Throughout their relationship, R.'s ex-partner severely abused her, including threats, verbal abuse, and physical abuse that resulted in R. needing to go to the hospital during her second pregnancy. R.'s ex-partner also physically and emotionally abused R.'s son A. About one week before R. and A. left Mexico for the United

States, her ex-partner attacked R. with a machete. R. has two children who remain in Mexico with their paternal grandparents. R. and A.'s Notices to Appear (NTAs) have not yet been filed with the court. NIJC filed skeletal asylum applications for R. and A. with USCIS. Because their applications were filed more than one year after they 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. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to R. and A.'s merits hearing, which has not yet been scheduled.

***6. J. is a woman from Ecuador. Her daughter, S. is a derivative on her application for asylum and is also independently eligible. J. and S. are awaiting a Master Calendar hearing date. They speak Spanish and live in Chicago, IL. (21-0150688) (21-0151647)***

When J. was a young woman, she met her first partner and father of her first two children. He abused her for several years until they separated. She made several reports against him. J. met her next partner, S.'s father, a few years later. He severely abused J. throughout their relationship. He beat and threatened her often. She finally separated from him after several years, but he continued to threaten her. J. then entered a relationship with a woman. She and her partner faced a lot of discrimination, harassment and threats for being together. J.'s second partner often called to threaten her, insult her, and even found her and beat her up again. Several months before coming to the United States, J. and her partner received a letter at their home calling them lesbians and telling them they were going to be killed. They began preparing to come to the United States and fled as soon as they had the money. J. arrived in the United States in July of 2021. Although J. and S. were issued Notices to Appear (NTAs) by the Department of Homeland Security 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. USCIS must receive their initial asylum applications by July 1, 2022. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***7. M. is a 17-year-old girl from Ecuador. She was designated an Unaccompanied Minor upon entering the United States. M. speaks Spanish and lives with her sister in Chicago, IL. (21-0151914)***

M. was physically and verbally abused by her father since she was a toddler. M.'s father beat M., her mother, and her siblings almost daily. When M. escaped with her siblings, her father found them and dragged them back to their home and beat them. M. and her mother called the police on him several times, but the police never arrived. M. fled Ecuador to escape from her father. After arriving in the United States, M. was apprehended by immigration officers, placed in ORR custody, and designated an unaccompanied minor. As a previously designated unaccompanied child, the asylum office has initial jurisdiction over her case. NIJC will file her initial skeletal asylum application with USCIS before her one-year filing deadline, on July 7, 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 to 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.*

### **8. *K. is a gay man from Jamaica. He speaks English and lives in Chicago, IL. (22-0152922)***

K has known that he was gay since he was in middle school, but he was very closeted while living in Jamaica because he feared how others—including his family and community—would react if he came out. K suffered significant psychological harm from being forced to hide his sexual orientation while living in Jamaica. Because he did not live openly as a gay man in Jamaica, K.'s fear of future harm will also be a significant component of this case. While visiting a friend in the United States in fall of 2021, K. had "a mental awakening" that he felt safer, more relaxed, and more able to be himself here. He quit his job and decided to stay and seek asylum. The Chicago Asylum Office must receive K.'s asylum application by August 28, 2022. Pro bono counsel must file all affidavits and supporting materials for K.'s case one week prior to K.'s asylum interview, which could occur as soon as four to six weeks after the application is filed.

### **9. *R. is a gay man from Jamaica. He speaks English and lives in Chicago, IL. USCIS must receive R.'s affirmative asylum application prior to July 14, 2022. (21-0152603)***

As a child, R.'s peers bullied him by calling him gay slurs. As a young adult, people on public transit called R. gay slurs. Around 2017, R. was on his way to a college class when the driver of a car called him gay slurs and threatened to hurt him. The driver pulled over, and R. jumped into a taxi to escape. R. was unable to seek help from the police in Jamaica because he knew that the police often harm gay people. After this experience, R. stopped going out in public except for when he absolutely had to. R. fears that if he were to return to Jamaica, it would only be a matter of time before he was severely harmed or killed for being gay. R. came to the United States on a tourist visa on July 15, 2021. USCIS must receive R.'s affirmative asylum application by July 14, 2022. Pro bono counsel will file R.'s initial asylum application and then work up the rest of his case, which includes an affidavit, letters of support, country conditions research, and a brief. Pro bono counsel will also prepare R. for his asylum interview and accompany him to it when it is scheduled.

### **10. *S. is a lesbian woman from Serbia. She speaks English and lives in a suburb of Chicago, IL. She speaks English. (19-0132407)***

S. is a lesbian woman from Serbia. After she was outed at the school where she worked, she experienced discrimination and her son was bullied. Her ex-girlfriends' brother came to her school and threatened her with a gun. She was eventually pushed out of her job. S. initially filed affirmatively for asylum, but her case was referred to immigration court due to a one-year filing deadline issue. All affidavits and supporting materials for S.'s case will be due 15 days prior to her individual merits hearing, which is currently scheduled for a merits hearing on August 2,

2023. If pro bono counsel and client mutually agree, it may be possible to file a motion to advance this hearing given changing country conditions in Serbia and the fact that S. has two young children there.

***11. X. is a gay man from El Salvador. He speaks Spanish and is living with a sponsor in San Jose, CA. (21-0150406)***

X. is a gay man from El Salvador who suffered homophobic violence while living there, including childhood sexual abuse and a brutal beating with a baseball bat by a group of men. X. also witnessed the murder of a friend by gang members and later testified in court against the gang. However, after this trial, the police forced him to testify, under threat, in other gang cases that he knew nothing about. As a result of this testimony, the gang threatened to kill both X. and his family and attacked him on multiple occasions. Upon entering the United States in April 2021, he was detained for nearly eight months on spurious gang allegations despite the fact that he was himself targeted by gang violence. He was finally released in December 2021 after prolonged advocacy from NIJC. X. was scheduled for an Individual Hearing on his asylum case while detained. He was released just days before this hearing, and his case was reset for a Master Calendar Hearing on March 11, 2022 before the Immigration Court in San Francisco, California. Accordingly, NIJC has already filed a pre-hearing statement and all evidence in X.'s case. NIJC is seeking the assistance of pro bono counsel to represent X. in court at this Master Calendar Hearing and a subsequent Individual Hearing. Pro bono counsel will review all previous filings, prepare X. and his witnesses for direct and cross-examination, and when ready, file a motion to schedule X.'s individual hearing.

***12. J. is a lesbian woman from Venezuela. She speaks Spanish and lives in the suburbs of Chicago, IL. (21-0152224)***

From a young age, J. was bullied in school by peers who suspected her to be a lesbian because she didn't like boys and didn't do traditional "girl" things. J.'s family was extremely religious, and when they found out about her sexual orientation, they attempted to exorcise her and beat her. When it became clear that no tactics would change her sexual orientation, J.'s family kicked her out of the house. Around 2019, J. moved to Chile to be with a woman, she had met online, M., who is also Venezuelan. In Chile, J. and M. continued to suffer homophobia. In January 2021, J. and M. were in a market together holding hands when a group of men attacked them while calling them homophobic slurs. After this, J. and M. decided to come to United States in order to live and date safely and freely. They entered together in August 2021. Both J. and M. were detained upon crossing the border, and J. was released on recognizance. She received a Notice to Appear (NTA), however it has not yet been filed with the Executive Office of Immigration Review (EOIR). Unless EOIR receives J.'s NTA before her asylum application ready to be filed, her asylum application will be filed affirmatively with the Chicago Asylum Office. J.'s asylum application must be filed by August 25, 2022, after which her case will be transferred to the Chicago Immigration Court and she will receive a hearing date.

**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.*

***13. 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 January 5, 2024. 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 a teenager, 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 and he raped her in a cemetery. He threatened her not to tell anyone what he had done and indicated that he knew she had brothers and a 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 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 15 days prior to her individual merits hearing, which has not yet been scheduled.

***14. 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. They are awaiting the rescheduling of their merits hearing. S. and his family speak Spanish and live in Chicago, IL. (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 15 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.

***15. 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, IL. (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 15 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.

***16. L. is a man from Honduras. L.'s Master Calendar hearing was cancelled due to the COVID-19 pandemic and has not been rescheduled. L. speaks Spanish and lives in a southwestern suburb of Chicago, IL. (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 15 days prior to his individual merits hearing, which has not yet been scheduled.

***17. K. is a man from Honduras. His next Master Calendar hearing was cancelled due to the COVID-19 pandemic and has not yet been rescheduled. K. speaks Spanish and lives in Chicago, IL. (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 his case will be due 15 days prior to his individual merits hearing, which has not yet been scheduled.

***18. A. is a man from Cuba. His wife L. will be a derivative on A.'s asylum application and is independently eligible for asylum. A. and L. speak Spanish and lives in a southern suburb of Chicago, IL. (21-0150113) (21-0148960).***

A. was drafted for military service but when he refused, he was detained, tortured, and subjected to beatings and threats to disappear him because he was deemed counterrevolutionary. Afterwards, A. continued to refuse to participate in the military and began protesting on the streets against the government. Later, A. began a small business, but his supplies were confiscated by government officials at the airport and later government inspectors came to his home to confiscate all of his work tools, equipment, and supplies. The inspectors threatened to disappear A. and extorted A. for money. A. fled Cuba in early 2018. L. was forced to participate in pro-government school and community events when she was young which solidified her anti-government beliefs. Later, L. became an attorney and worked for a state-owned company where she was singled out by her employer as someone who did not participate in pro-government events. L. was asked to testify falsely on behalf of her employer and when she refused, she was threatened, suspended from her job, and interrogated and sexually assaulted by the police. L. fled Cuba in July 2018. L. and A. met while still in Cuba, and later married en route to the United States. Although A. and L. were issued Notices to Appear (NTAs), the Department of Homeland Security has not filed the NTAs with the immigration court, so their asylum applications were timely filed with USCIS. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***19. J. is a man from El Salvador. His son D. is a derivative on J.'s application for asylum and is also independently eligible for asylum. J.'s wife, R., and her daughter, C., came to the United States following J.'s arrival. J. and D.'s next Master Calendar hearing is on November 9, 2022. R. and C.'s next Master Calendar Hearing is on November 17, 2023. The family speaks Spanish and live in Indianapolis, IN. (20-0143863) (20-0143876) (21-0150631) (21-0150763)***

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 two 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. In the months leading up to J. and his son, D., fleeing, he told MS-13 members that he had to stop paying them. Around this time, D., and J.'s stepdaughter, C., were walking home when a man attempted to kidnap them. D. and C. were able to get away and the family made a police report. The police did not follow up on the report. J. closed his business; he and D. fled to the United States. After their departure, the gang continued to threaten J.'s wife, R., who worked as an attorney. Gang members approached her and her colleagues, and tried to force them to work for them. She and

C. then also fled to the United States. All family members have timely filed their applications for asylum. Their cases will need to be consolidated before the same judge. All affidavits and supporting materials to their case will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

***20. A. is a woman from Honduras. Her daughter, B., is a derivative on her application and is also independently eligible for asylum. They are currently waiting for their Master Calendar hearing to be rescheduled. They speak Spanish and live in Northern IL. (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 filed 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 15 days prior to their individual merits hearing, which has not yet been scheduled.

***21. 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 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 to six weeks after the skeletal application is filed.

***22. R is a woman from Venezuela. Her next Master Calendar hearing is scheduled for November 10, 2022. R. speaks Spanish and lives in western suburb of Chicago, IL. (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 in a 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 15 days prior to her individual merits hearing, which has not yet been scheduled.

***23. Z. is a woman from Colombia. Her husband D. is a derivative on her asylum application and he is also independently eligible for asylum. Their next Master Calendar hearing is on November 17, 2022. Z. and D. speak Spanish and live a western suburb of Chicago, IL. (21-0148469) (21-0150073).***

Z. became a joint owner of a transportation co-op in Colombia where she owned a vehicle and coordinated transport. Z. hired a driver to transport goods in her vehicle. On the way to the destination, a nationally known armed group created a roadblock for the driver, attempting to collect an extortion fee. The driver sped through the roadblock, injuring one of the armed group members. Because Z. is the registered owner of the vehicle, the armed group initiated proceedings against her during a time that the Colombian government was in peace negotiations. Later, the armed group member who was hit in the accident died and the armed group escalated threats against Z. and D. Z. was brutally attacked by people identifying themselves as part of the armed group, resulting in a miscarriage. Z. and D. fled Colombia for the United States in December 2019, were placed in removal proceedings, and filed for asylum in December 2020. Z. and D.'s affidavits and supporting documents will be due to the immigration court 15 days prior to their merits hearing, which has not yet been scheduled.

***24. 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 15 days prior to her merits hearing in 2023.

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

R. and his family lived in a rural community in central Mexico. In early 2019, members of 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 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. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***26. 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, IL. (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 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. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***27. 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, IL. (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 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 15 days prior to their individual merits hearing, which has not yet been scheduled.

***28. 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's next Master Calendar hearing is scheduled for November 29, 2023. F. and his family speak Spanish and live in Chicago, IL. (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 15 days prior to their individual merits hearing, which has not yet been scheduled.

***29. 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, IL. (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 go 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. filed 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 15 days prior to his 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***

***lives in Chicago, IL. (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 15 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. 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 northwestern suburb of Chicago, IL. (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 15 days prior to her individual merits hearing, which has not yet been scheduled.

***32. A. is a woman from Guatemala. Her four children are derivatives on A.'s application for asylum. Her eldest daughter C. has an independent asylum case at the asylum office. Her two youngest daughters recently arrived as unaccompanied minors and are not yet scheduled for court. A. and her son are awaiting their next court hearing. A.'s Eldest daughter C.'s master calendar hearing is on March 8, 2023. A. and her family speak Kanjobal and 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. Fearing for their lives, A. fled with her children to the United States. Because A. and her son filed for asylum after their one-year deadline, her pro bono attorneys will need to argue that they merit 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 15 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. A. and her son are awaiting their next court hearing. Eldest daughter C.'s master calendar hearing is on March 8, 2023.

***33. L. is a woman from Venezuela. She is awaiting a new Master Calendar hearing date. L. speaks Spanish and lives in Chicago, IL. (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 15 days prior to her individual merits hearing, which has not yet been scheduled.

***34. R. is a woman from El Salvador. Her son, A., is a derivative on her application, and is also independently eligible for asylum R. and A.'s next Master Calendar hearing has not been scheduled. R. speaks Spanish and lives in a northern suburb of Chicago, Illinois. (21-0147562) (21-0147563)***

During much of their relationship, R.'s ex-partner 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 filed R. and A.'s skeletal asylum applications with the immigration court in November 2021. Since their applications were 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 15 days prior to their merits hearing, which has not yet been scheduled.

***35. 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 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 15 days prior to his individual merits hearing, which has not yet been scheduled.

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

R.'s partner was a member of the Mara 18 gang. Soon after R. and her partner 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 15 days prior to her individual merits hearing, which has not yet been scheduled.

***37. N. is a woman from Honduras. N. speaks Spanish and lives in a northwestern 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. NIJC filed N.'s asylum application with USCIS in November 2021. Once her NTA is filed with the court, she will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing.

***38. V. is a woman from Guatemala. Her son X. is listed as a derivative on her application and is also independently eligible for asylum. 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. NIJC filed their asylum applications with USCIS on November 12, 2021. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***39. O. is a man from Haiti. O. speaks Haitian Creole and live in Indianapolis, IN. (21-0148753)***

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, they fled to the United States in 2021. Now that O. and his former partner are no longer together, he is seeking asylum on his own. Although O. was issued a Notice to Appear (NTA), the Department of Homeland Security (DHS) has not yet filed his NTA with the immigration court, so O. is not yet in removal proceedings. Unless and until DHS files the NTAs with the court, USCIS maintains jurisdiction over any asylum application he files. NIJC timely filed his skeletal asylum application with USCIS. Once his NTA is filed with the court, he will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to his individual merits hearing. O. is independently eligible for Temporary Protected Status (TPS) and has a TPS application currently pending before USCIS.

***40. R. is a woman from Haiti. Her son, L., is a derivative on her application for asylum and is also independently eligible for asylum. R. and her child speak Haitian Creole and live in Indianapolis, IN. (21-0148754) (21-0149461)***

R. was a member of a prominent political party in Haiti and her former partner was an organizer the same party. Suspected individuals from a rival political party burned the family's home to the ground after threatening her former partner and running him off of the road. Fearing for their lives, R., L., and R.'s former partner fled to the United States in 2021. Since R. and her former partner are no longer together, they are seeking asylum independently. Although R. and L. were issued Notices to Appear (NTA), the Department of Homeland Security (DHS) has not yet filed their NTAs with the immigration court, so R. and L. are not yet in removal proceedings. NIJC timely filed their skeletal asylum applications with USCIS. Unless and until DHS files their NTAs with the court, USCIS maintains jurisdiction over their asylum applications. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing. R. and L. are independently eligible for Temporary Protected Status (TPS) and have TPS applications currently pending before USCIS.

***41. S. is a young man from Guinea. S. speaks French and lives in a western suburb of Chicago, IL. (21-0150361)***

S. grew up in Conakry, Guinea. He and his family are ethnic Pules, and S.'s father was a member of the opposition political party, Union de Force Democratique de Guinea (UFDG). When S. was six years old, government forces shot and killed his father during an anti-government protest. Afterwards, S. had a normal childhood until anti-government protests re-started in 2019, while S. was at school. On his way home, S. ran into state security forces who thought that S. was a protester. The government arrested him and killed one of his friends. The government detained S. for a month and tortured him. S.'s mother managed to bribe a guard to help S. escape and he fled the country. S. entered the United States on April 14, 2021, was detained for two months and released after passing a credible fear interview. Upon release, the Department of Homeland Security issued a Notice to Appear (NTA) to S. His NTA has not yet been filed with the immigration court, so he is not yet in removal proceedings. Unless and until his NTA is filed with the immigration court, USCIS retains initial jurisdiction over his application for asylum. NIJC plans to file his asylum application before his one-year deadline, which is April 14, 2022. Once A.'s NTA is filed with the court, he will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to his individual merits hearing.

***42. S. is a man from Colombia. His wife, A. and their kids, E. and P., are derivatives on his application for asylum and are also independently eligible for asylum. S. and his family are awaiting a new Master Calendar hearing date. They speak Spanish and live in a southwestern suburb of Chicago, IL. (21-0147271) (21-0147596) (21-0147598) (21-0147599)***

S. worked as an engineer for a Colombian airline. His position involved overseeing the influx of luggage and goods, and granted him access to many parts of the airport that are generally

restricted. In 2018, two of S.'s colleagues approached him and asked him to collaborate with the Revolutionary Armed Forces of Colombia (FARC) by facilitating the transportation of drugs through the airline. S. declined this request, subsequently received more requests, and eventually threats from members of the FARC. S. tried to report the attempted recruitment to airport administrators and the police, but the threats only worsened. At one point, two men went to A.'s workplace and told her that she'd better advise her husband to collaborate with them or else he'd be in danger. At the end of 2018, the family received a letter indicating that S. had until the end of the year to collaborate with them, or the lives of his entire family would be at risk. The family immediately fled. Then, family and friends reported that people had come to S.'s home looking for him. S. submitted his application for asylum with USCIS in December 2020, completed an asylum interview in 2021, and was referred to the immigration court. Because the asylum application was filed more than one year after S. and his family 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 15 days prior to their individual merits hearing, which has not yet been scheduled.

***43. J. is a woman from El Salvador. She does not have any derivatives on her asylum application. J. speaks Spanish and lives with her partner and two U.S. citizen children in Northern Indiana. (21-0148122)***

J.'s mother physically and emotionally abused her throughout her childhood. When J. was a teenager she lived on the border between rival gang territories. She was accused by MS-13 gang members of passing information to the rival gang. A group of about 10 armed gang members surrounded her and threatened to kill her if she didn't leave within 24 hours. J. went to a different city to report this incident to the police but was still scared of violent repercussions from the gang. She fled to the United States soon after. The MS-13 gang now regularly extorts J.'s family in El Salvador and has threatened J. with harm upon her return to El Salvador. J. entered the United States as an unaccompanied child in 2016. She filed her skeletal asylum application in 2019. She attended an interview with the Asylum Office in February 2020, and her case was referred to immigration court in March 2021. Because her 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 15 days prior to her merits hearing, which has not yet been scheduled.

***44. 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 on August 17, 2022. M. and C. speak Spanish and live in Chicago, IL. (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 15 days prior to their individual merits hearing, which has not yet been scheduled.

***45. R. is a woman from El Salvador. Her children K., G., and A. will be derivatives on her asylum application. R., K., G., and A. speak Spanish and live in Central Indiana. (21-0151593) (21-0152264) (21-0152267) (21-0152268)***

R. grew up in a physically abusive home and was raped by her mother's boyfriend when she was a child. When she was teenager, she moved in with an older man who was physically abusive and had her first child, K., as a teenager. To escape the abuse, she moved back in with her aunt and brother. A gang began demanding her brother join them, and attacked him when he refused. Around 2012, R., K., and R.'s brother moved to escape the gang. Around 2019, the gang found them and began threatening R.'s brother again. He then fled the country to escape the gang, but they murdered him in Mexico. Shortly thereafter, the gang threatened R. She and her children fled to the United States in the summer of 2021. Although R. and her children were issued Notices to Appear (NTAs) by the Department of Homeland Security 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. Their asylum applications must be filed with USCIS by their one-year deadline of June 29, 2022. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***46. E. is a young man from Guatemala. His next Master Calendar hearing is scheduled on November 2, 2022. E. speaks Spanish and lives in Chicago, IL. (21-0150685)***

When E. was in high school, local gang members began to demand that E. help them with their illegal activities. E. refused and the gang members pushed him to the ground. The gang members continued demanding that E. assist them. Each time, E. refused and the gang members beat him. The gang then killed E.'s cousin for defying their demands. The gang's threats escalated to the point that the gang members threatened him with a gun in late 2020/early 2021. E. fled Guatemala soon afterwards. He was apprehended by immigration officers, and was placed in ORR custody. As a previously designated unaccompanied child, the asylum office has initial jurisdiction over his case even though E. is scheduled for a Master Calendar Hearing on November 2, 2022 in immigration court. NIJC filed E.'s skeletal asylum application with USCIS before his one-year deadline in March 2022. . Affidavits and other supporting documents will be due one week prior to his interview at the asylum office, which may occur as soon as four to six weeks after the skeletal application was filed.

***47. M. is a woman from Honduras. Her son, J., is a derivative on her asylum application, and is also independently eligible for asylum. Their next Master Calendar Hearing is April 30, 2024. M. and J. speak Spanish and live in Indianapolis, IN. (21-0152248) (20-0145265)***

When M. was a teenager, her father was murdered. Shortly thereafter, she moved in with an older man who physically and sexually abused her over the course of several years. Early in the relationship, M. and her sister reported the abuse to the police, but they did not hold him accountable. After she separated from her abuser, M. was robbed at gunpoint by armed men. Then gang members began extorting her, demanding she pay them or they would kill her. She reported this to the police, but the gang continued to extort and threaten her until she and her son fled Honduras. At the United States-Mexico border, they were returned to Mexico and forced to pursue their asylum cases through the MPP “Remain in Mexico” process. M. timely filed her asylum application while in Mexico and NIJC later filed an updated asylum application for her and J. Their cases are consolidated under the jurisdiction of the Chicago Immigration Court. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

***48. S. is a woman from El Salvador. Her daughter, A., is a derivative on her asylum application and is also independently eligible for asylum. S. and A. speak Spanish and live in Chicago, IL. (21-0147903) (21-0148264)***

S.’s ex-partner and the father of her daughter, A., was physically, financially, and emotionally abusive to S. throughout their relationship. He refused to allow S. to leave his family home and attempted to force her to have sex with the patrons of his family’s liquor store and small restaurant. S.’s ex-partner threatened that the patrons would find and harm her if she disobeyed him, many of whom were Salvadoran gang members. S. escaped with her daughter A. and came to the United States in July 2018. Although S. and A. were issued Notices to Appear (NTAs) by the Department of Homeland Security 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. For this reason, NIJC filed S. and A.’s applications for asylum with USCIS in July 2021. Because their applications were filed more than one year after S. and A. 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. Once their NTAs are filed with the court, they will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***49. P. is a man from Nicaragua. P. speaks Spanish and lives in a western suburb of Chicago, IL. (21-0152440)***

As a university student in Nicaragua, P. helped form a political organization that advocates for democracy, justice, and human rights. He was active in the organization as a leader and participated in public demonstrations in opposition to Nicaraguan government policies. After pro-government forces threatened, detained, beat, and tortured P., he fled the country. When P. entered the United States, the Department of Homeland Security (DHS) issued him a Notice to Appear (NTA), but the NTA has not yet been filed with the immigration court. Unless and until his NTA is filed with the court, USCIS retains initial jurisdiction over his asylum application. USCIS must receive P.’s skeletal asylum application by his one-year deadline of July 11, 2022. Once his NTA is filed with the court, he will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to his individual merits hearing.

***50. C. is a woman from Venezuela. C. speaks Spanish and lives in a western suburb of Chicago, IL. (21-0151462)***

C. was part of Venezuela's national criminal investigations unit. She witnessed how the government represses pro-democracy protestors when her unit became involved in arresting protestors. As a result of her opposition, C. refused orders to work at a demonstration. Her supervisors punished her and prohibited her from resigning. Out of fear, C. fled the country. She believes that if she were to return to Venezuela, she would be detained and mistreated by the government. When C. entered the United States, the Department of Homeland Security (DHS) issued her a Notice to Appear (NTA), but the NTA 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 asylum application. For this reason, NIJC attorneys filed C.'s asylum application with USCIS in October 2021. Once her NTA is filed with the court, she will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing.

***51. K. is a woman from Mexico. Her daughters, M. and P. are derivatives on her application and are also independently eligible for asylum. They are awaiting the rescheduling of their next Master Calendar hearing. K., M., and P. speak Spanish and live in Northcentral Indiana. (21-0151592) (21-0151815) (21-0151817)***

K. lived with her partner, T., and their children, M. and P., in Mexico. T. disappeared in 2016. K. filed a report with local law enforcement. While investigating T.'s disappearance on her own she discovered that armed men had taken him. K. joined Familia Unidas, a group advocating for information about their disappeared family members, and participated in marches and group meetings. Through the advocacy of Familias Unidas, K. filed a second police report to elevate her partner's disappearance. She began to notice trucks parked outside her house at night. K. feared for her life when she learned that other members of Familias Unidas had been killed. She fled with her children, M. and P., to the United States in 2019. After K. and her children fled Mexico, armed men kicked T.'s parents out of their house and threatened to kill them if they did not leave. After they fled, they learned their house had been burned down. NIJC filed their skeletal asylum applications with the immigration court in January 2022. Because their applications were filed more than one year after they 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 will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

***52. A. is a woman from Cameroon. A. speaks English and lives in Chicago, IL. (21-0151698)***

A. participated in a humanitarian group which brought food, clothes, and other aid to local anglophone villages that were attacked by the French Cameroonian government military. The humanitarian group is funded by a separatist political group that actively opposes the French Cameroonian government. This made A. a target despite not participating in protests or meetings for the political group. Military officials detained A. for about four months. Guards and officials daily tortured and raped A. Her father managed to bribe a guard to help A. escape and she fled

the country. Pro bono attorneys will need to pay special attention to the possible TRIG issues that may arise due to A.'s association with the separatist political group; NIJC will assist with this analysis. The immigration court must receive A.'s skeletal asylum application prior to her one-year deadline of June 7, 2022. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing, which has not yet been scheduled.

***53. R. is a woman from Honduras. Her two children, S. and E., are derivatives on her application for asylum. The family speaks Spanish and lives in Northern Indiana. (22-0153250) (22-0153550) (22-0153551)***

When R. was a child, the director of her school molested her several times. As a teenager, a much older man forced her into a relationship. He then verbally and sexually abused her. After several years of abuse, R. left him. Later on, R. got involved in politics. When the local gang realized that she was involved in politics, they told R. to help the local gang leader get involved in her political party, or the gang would kill her. R. refused and fled the country with her children. Although R., S., and E. were issued Notices to Appear (NTAs) by the Department of Homeland Security 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. Once their NTAs are filed with the court, they will be placed into court proceedings. NIJC timely filed their initial skeletal asylum applications with USCIS in April 2022. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

***54. G. is a woman from Honduras. Her son, E., and her partner, R., will be derivatives on her asylum application. She speaks Spanish and lives in Central Indiana. (21-0152573) (21-0152573) (22-0153320)***

G. began receiving threats from her aunt's partner who began threatening her after her aunt fled Honduras. G. and her family had refused to tell him where she was. Another one of G.'s aunts was kidnapped by a local gang leader related to her aunt's abuser. Gang members tortured her aunt and left her for dead. G. and R. fled with her family to Mexico, but while in Mexico, G. began to receive threatening, anonymous messages from gang members stating they knew their whereabouts and they would pay for disobeying. G., R., and E. are all in removal proceedings but their NTAs have not yet been filed with the immigration court. Therefore, USCIS retains initial jurisdiction over their applications for asylum. USCIS must receive their initial asylum applications before their one-year deadline on May 6, 2022. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing.

***55. P. is a woman from Haiti. Her daughter, O., is a derivative on her application for asylum. They are currently scheduled for a Master Calendar Hearing before the Chicago Immigration Court on October 18, 2023. P. and O. speak Spanish and live in a suburb of Indianapolis, IN. (22-0153744) (22-0153969)***

Growing up, P.'s father was a leader in a political party, and P. helped to support the party's campaigns. One day, a group of armed men came into P.'s home, beat her father, put a gun to his head, and threatened to kill him and his family if he continued his political involvement. When

P. was in her early 20s, a previously incarcerated gang member forced her to be in a relationship with him. For several years, the gang member regularly raped and tortured her. Eventually, she escaped and moved to Chile, but since she was not safe there either, P. decided to make the journey to the United States with her daughter. NIJC filed an asylum application for P, but because this application was filed more than one year after P. entered the United States, her pro bono attorneys will need to argue that she merits an exception to the one-year filing deadline. NIJC will assist them in making this argument. All affidavits and supporting materials will be due 15 days prior to P.'s 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.*

### ***56. D. is a 20-year-old girl from Honduras. She and her mother speak Spanish and live in Central Illinois (McLean County). (21-0152325)***

D. grew up without her father, who abandoned her as a baby. He never acknowledged that D. was his child, but his parents did, and occasionally visited their granddaughter. D. grew up with her maternal grandparents in Honduras, until her grandmother passed away in 2014. D. then came to the United States as an unaccompanied child to join her mother, who had come to Illinois to find work. In 2018, D. learned that her father had passed away as well. D. is now living with her mother and attending community college. A pro bono attorney will need to file a post-18 guardianship case on behalf of D.'s mother, asking that the court establish D's paternity, and that D's mother be appointed D's legal guardian until D. turns 21. The guardianship order must include findings that D.'s reunification with her father is not viable due to his abandonment, and that it is not in D.'s best interest to return to Honduras. This order must be entered prior to D.'s 21<sup>st</sup> birthday in February 2023.

### ***57. 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.



***58. 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.

***59. T. is a 14-year-old girl from Honduras. She and her mother speak Spanish and live in Northern Illinois (Kane County). (21-0151271)***

T.'s father abandoned her when she was an infant and did not provide any financial or emotional support throughout her childhood. T.'s father passed away in June 2021 of cirrhosis. Before his passing, T.'s father attempted to kidnap T. on various occasions and was abusive towards T.'s mother. T.'s mother fled to the United States around 2017 and left T. in the care of her maternal grandmother. Around February 2020, T. fled Honduras to escape death threats by gang members and to reunite with her mother. A pro bono attorney will need to file a petition for sole allocation of parental responsibilities on behalf of T.'s mother, and obtain an order finding that T.'s reunification with her father is not viable due to abandonment and abuse, and that it will not be in T.'s best interest to return to Honduras.

***60. C. is a 15-year-old boy from Honduras. He and his mother speak Spanish and live in Northern Illinois (Lake County). (21-0150534)***

C.'s father abandoned him when C. was very young, has not provided any financial or emotional support throughout his childhood, and rarely communicated with him. C.'s mother came to the United States when C. was around a year old, they maintained regular contact, and she sent money to provide for his well-being. C. was raised by his paternal grandmother; but in 2019 C. left Honduras to reunite with his mother because his grandmother was too old to care for him. A pro bono attorney will need to file a petition for sole allocation of parental responsibilities on behalf of C.'s mother, and obtain an order finding that C.'s reunification with his father is not viable due to abandonment and neglect, and that it will not be in C.'s best interest to return to Honduras.

***61. C. is a 9-year old girl from Honduras. She speaks Spanish and lives with her mother in Northern Illinois (Kane County). (22-0153142)***

C. does not have a relationship with her father. C.'s father abandoned her when she was two years old and has not provided any financial or emotional support since then. Before C.'s father and mother separated, he physically abused C.'s mother. In 2015, C.'s maternal grandmother was murdered in Honduras. C. and her mother fled to the United States in 2017 to escape death threats. A pro bono attorney will need to file a petition for sole allocation of parental responsibilities on behalf of C.'s mother, and obtain an order finding that C.'s reunification with her father is not viable due to his abandonment, and that it is not in C.'s best interest to return to Honduras.

***62. P. is a 15-year old girl from Honduras. She speaks Spanish and lives with her mother in Chicago, IL (Cook County). (22-0153811).***

P. grew up with her mother, father, and siblings in Honduras. When she was six years old, gang members murdered her father and threatened her family. Her mother fled Honduras in 2013 due to the seriousness of the threats, leaving P. in hiding with other family members. Gang members continued to threaten P.'s family, and P. fled to the U.S. in January 2022 to join her mother in Chicago. A pro bono attorney will need to file a petition for sole allocation of parental responsibilities on behalf of P.'s mother, and obtain an order finding that P.'s reunification with her father is not viable due to his death, which constitutes abandonment under IL law, and that it is not in P.'s best interest to return to Honduras.

## **NIJC Announcements**

### **As Remote Work Continues to Evolve, Review these Updates to Stay Informed:**

#### **[Chicago Immigration Judges Announce Move To Tele-Video Hearings](#)**

Certain Chicago Immigration Judges have announced that they will be holding all hearings via WebEx, which raises concerns about due process protections for noncitizens in removal proceedings, particularly asylum seekers. Please review the announcement on NIJC's website for more information about opposing a Tele-Video hearing.

### **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.