

NATIONAL IMMIGRANT JUSTICE CENTER

A HEARTLAND ALLIANCE PROGRAM

January 18, 2023

NIJC Pro Bono Case List: 76 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.

- **Priority Matters for Pro Bono Placement:**
 - Defensive asylum cases with upcoming hearings
 - Special Immigrant Juvenile Status (SIJS)

- **Asylum Seekers in Need of Pro Bono Counsel:**
 - Asylum: Affirmative and Unaccompanied Children Cases before USCIS
 - Asylum: Based on Domestic and Gender Violence
 - Asylum: Based on Gender Identity and Sexual Orientation
 - Asylum: Based on Political Opinion, Religious Beliefs, or Opposition to Criminal Organizations

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

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 Lili Henkel at lhenkel@heartlandalliance.org
- **Afghan** cases, contact Natalie Reysa at nreysa@heartlandalliance.org
- **SIJS** cases, contact Berenice Sanchez Ruiz at bsanchezruiz@heartlandalliance.org
- **U Visa** or **VAWA** cases, contact Katie Mayopoulos at kmayopoulos@heartlandalliance.org
- **LGBT** cases, contact Moises Lopez Soltero at mlopezsoltero@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.

Priority Matters for Pro Bono Placement

Defensive Asylum Cases with Upcoming Hearings- Priority

- 1. A. is a transgender woman from El Salvador. She speaks Spanish and lives in Central Indiana. A. is scheduled for a merits hearing on June 14, 2023. (20-0141072).*

A. was beaten by her brothers and father as a teenager because she was perceived as gay. She was also bullied in school. She worked as a cook on a military base, where she was frequently harassed. A psychologist on the base counseled her to no longer be trans. When she finally left this job, members of the military threatened her. In 2016, she was raped by gang members. Many of her friends were murdered in El Salvador because they were trans. A. fears the same would occur if she returns. A. left El Salvador in 2019 and was detained at the U.S. border. After passing a credible fear interview, she was released from detention and went to live with her supportive aunt. NIJC filed her I-589 within the one-year filing deadline. All affidavits and supporting materials for A.'s case will be due 15 days prior to her individual merits hearing, which is currently scheduled for June 14, 2023.

- 2. M. and T. are a husband and wife from Venezuela. M. has a Master Calendar hearing scheduled for March 22, 2023 and T. has a merits hearing scheduled for July 25, 2023. M. and T. speak Spanish and live in a western suburb of Chicago. (21-0151358) (21-0151546).*

M. and T. were both student activists with an anti-government, pro-democracy political party in Venezuela. M. was a leader with the party. In his role, M. helped organize peaceful demonstrations, distributed pamphlets, and assisted the main leader of the student activists. M. also helped the community by distributing food, water, and other necessities. One day, pro-government actors shot at T.'s house and kidnapped, beat, and threatened to kill M. Afterwards, M. continued to go to demonstrations, and as a result the pro-government actors announced that he had one week to leave the country or else he would be killed. M. fled to Colombia, and T. later joined him. M is also a citizen of Colombia, where he fears harm because of a land dispute between the FARC and his father's family. M. and T. entered the United States together and were placed in removal proceedings. With NIJC's support, M. and T.'s pro bono attorneys will need to argue that they are not barred from asylum due to firm resettlement. M. and T. will proceed separately and pro bono attorneys will need to prepare two affidavits. M. is scheduled for his first master hearing on March 22, 2023. He will be set for a merits hearing at a later date; all supporting documents for his case will be due 15 days prior to his merits hearing. T. already attended her master calendar hearing and is scheduled for a merits hearing on July 25, 2023. All supporting documents for T.'s case will be due 15 days prior to her individual merits hearing.

- 3. 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 set for a merits hearing on August 1, 2023. E. and his family speak Spanish and live in a southwestern suburb of Chicago, Illinois. (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 would call his personal number 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 with his son, D. The gang had also begun threatening D. E.'s daughter, S., fled to the United States in 2019. E. timely filed his application for asylum *pro se* in May 2019. NIJC filed individual applications for D. and S. in January 2021 and consolidated their cases with E.'s case. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which is scheduled for August 1, 2023.

4. *T. is a gay man from the Bahamas. He speaks English and lives in Wisconsin. His merits hearing is on October 4, 2023. (17-0113501).*

T. remembers being perceived as more feminine than other boys at a young age. He had family members who frequently would call him derogatory names and treat him differently because he was not masculine. At the age of 17, T. was raped and had cuts, bruises, and was bleeding but did not want to tell anyone, out of fear he could be harmed. On multiple occasions, T.'s older brother would beat him with a cutlass, rocks, and even held a knife to his head. T. is afraid to return to the Bahamas because many people believe he is gay, and they will harm him. NIJC filed T.'s I-589, Application for Asylum and Withholding of Removal on June 9, 2017. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which is scheduled for October 4, 2023.

5. *Y. is a gay man from Nicaragua. He speaks Spanish and lives in Indianapolis. His merits hearing is on December 6, 2023. (22-0160347).*

Y. grew up in a small town in Nicaragua, where he was sexually abused by a neighbor as a child. He was bullied in school and had difficulty finding employment because he was not masculine. When he was 28, he began working in a bank. Shortly after, his ex-partner began to threaten to out him and to harm him. Y. went to the police to report the threats and the police officer tore up his report, saying that police do not help gay people. He left Nicaragua with his sister months later. NIJC filed Y.'s I-589, Application for Asylum and Withholding of Removal on January 3, 2023. His Individual Hearing is scheduled for December 6, 2023. The filing deadline for all supporting materials for his case is November 15, 2023.

6. *C. is a woman from Mexico. She is scheduled for a merits hearing on April 16, 2024. Her four children will be derivatives on her asylum application. C. speaks Spanish and lives in Chicago, Illinois. (22-0155987)(22-0157084) (22-0157085) (22-0157086) (22-0157087)*

C. entered into a romantic relationship with her partner, G. Eventually, C. and G. had four children and got legally married. Throughout their relationship, G. was physically, sexually, and emotionally abusive towards C. G. raped C. and threatened her with a knife. Eventually, C. and her four children fled to the United States. C. filed her application for asylum *pro se* after her one year deadline in November 2017. Because C.'s application was filed more than one year after she 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 C.'s case will be due 15 days prior to their individual merits hearing, which is scheduled for April 16, 2024.

Special Immigrant Juvenile Petition - Priority

- 7. *K. is a 17-year-old girl from Ecuador. She lives with her mother, who speaks Spanish, in a western suburb of Chicago (Cook County). The predicate order must be obtained by K.'s 18th birthday in June 2023 (22-0160114)***

K.'s father left her with her mother when K. was two years old. Since then, K. has had no contact with her father apart from a few text messages throughout the years. K.'s father never provided her with any financial or emotional support. A pro bono attorney will need to file a petition for sole allocation of parental responsibilities on behalf K.'s mother and obtain an order finding that her reunification with her father is not viable due to his abandonment and that it is not in her best interest to return to Ecuador. K. has one full sibling who resides in Ecuador and will need to be included in the petition. Note that this sibling does not have their father's name on the birth certificate. NIJC will guide pro bono counsel through this process.

- 8. *E. is a 17-year-old girl from Guatemala. She lives with her mother's family friend, who speaks Spanish, in a southwest suburb of Chicago (Cook County). The predicate order must be obtained by E.'s 18th birthday in July 2023 (22-0160566)***

E. has never had a relationship or any contact with her father. E's father's name was never on her birth certificate because her parents separated before she was born. In Guatemala, E. lived with her mother and grandparents. E. has never received any emotional or financial support from her father. A pro bono attorney will need to file a petition for guardianship on behalf of E's family friend, and obtain an order finding that E's reunification with her father is not viable due to his abandonment, and that it is not in E's best interest to return to Guatemala.

- 9. *P. is a Spanish-speaking 17-year-old girl from Guatemala who lives with her Spanish-speaking aunt in the suburbs of Chicago (Cook County). Her petition must be approved before July 2023. (22-0159380)***

P. came to the United States from Guatemala. She grew up with seven siblings, her mother, and father. Her father did not provide any monetary support for any basic needs. He regularly beat P.'s mother in front of P. and her siblings. As P. got older, P. would try to intervene and protect her mother from her father, but her father would verbally abuse P. as well. P. fled to the United States, where she is now living with her aunt in a Chicago suburb. A pro bono attorney will need to file a petition for guardianship on behalf of P.'s aunt, and obtain an order finding that P. cannot be reunited with her father because of his abuse and neglect, and it would not be in her best interest to return to Guatemala. The petition must be approved before July 2023.

Asylum Seekers in Need of Pro Bono Counsel

Asylum: Affirmative and Unaccompanied Children's Cases before USCIS

If interested in representing these clients, please contact Lili Henkel, Asylum Pro Bono Project Coordinator, Moises Lopez Soltero, LGBT Pro Bono Project Coordinator, or Natalie Reysa, Afghan Pro Bono Coordinator.

10. B. is an HIV positive gay man from Venezuela. B speaks Spanish and some English and lives in a west Chicago suburb. His affirmative asylum application is pending with the Chicago Asylum Office, and he could be called for an interview soon. (22-0159082)

B. has been closeted through his life in Venezuela due to fear of harm. Multiple family members sexually abused B. in his youth; strangers assaulted B. multiple times during his adulthood. B. was diagnosed HIV positive 29 years ago, and for the past seven years, he has not been able to receive HIV due to nationwide medicine and equipment shortages. B. therefore resorted to sharing antiviral therapy pills with friends. B. protested the government's response to the HIV/AIDS crisis and the lack of medical treatment available. Police tried to hit him during the protests, and he saw police shoot and kill protesters, including a small boy and one of B.'s friends. These events and the lack of government protection instilled fear in B. He started medication for anxiety in 2019 after reading about gay Venezuelan men being killed. After his mother died, B. fled to the U.S. and arrived in July 2021. He filed his affirmative asylum application *pro se* in January 2022. Pro bono counsel should plan to update B.'s application and file all revised affidavits and supporting materials for B.'s case one week prior to B.'s asylum interview. NIJC asks that pro bono counsel prepare B.'s materials by the end of March 2023 as B. could be called for an asylum interview at any time. B. will also need support communicating with the Asylum Office to restart his asylum clock so that he can become eligible for work authorization.

11. N. is a bisexual man from Colombia. He speaks Spanish and English and lives in Des Plaines, Illinois. His affirmative asylum application must be filed by May 25, 2023. (22-0160426).

N. realized he was bisexual when he was 10 years old, after an older boy started molesting him. Still, very few people know that N. is bisexual because he was scared people would mock him or become violent with him if they knew he is attracted to men as well as women. N. has never had a romantic relationship with a man but has had sex with men. He and his wife amicably divorced in February 2022 because they were no longer attracted to each other sexually. She is one of the few people who knows that N. is bisexual. When N. has gone out in public with his gay friends, N. has seen them be assaulted by random people and harassed or molested by police. N.'s gay friends have also been arbitrarily detained by the police simply for being openly gay in public. N. fears that if he were to return to Colombia and be more open with his sexual orientation, he would be targeted for harassment and violence. N. has visited the United States numerous times because two aunts are U.S. citizens, so when he most recently entered on a tourist visa on May 25, 2022, he decided to remain in the U.S. and seek asylum. Pro bono counsel should plan to file N.'s asylum application by May 25, 2023. Pro bono counsel must file all affidavits and

supporting materials for N.'s case one week prior to N.'s asylum interview, which could occur as soon as four to six weeks after the application is filed.

12. E. is an HIV positive gay man from Russia. E. speaks Russian and lives in Chicago. USCIS must receive his affirmative application by September 2, 2023. (22-0160137).

E. knew he was gay by age 10. At age 19, after confessing that he had kissed a boy, the priest at E.'s church outed him to his family and the community. About a year later, two men came to his house, beat him, and tried to force him to drink cleaning detergent, to 'cleanse' him. At 37, police detained E. because he was not carrying an ID. He believes he was stopped because he looks Armenian. After finding messages with men in E.'s phone, the police beat E., breaking a metal piece in his spine used to treat scoliosis. While working for a public school, E. was told who to vote for, and when E. refused, the school did not give E. his annual bonus. The school administration then accused E. of pushing 'gay propaganda' after investigating E.'s social media which publicized queer rights articles and pictured E. with pride flags. The school fired E., and he was unable to find another job. E. was diagnosed with HIV in 2021 and was initially denied medication. E. left Russia to seek asylum because of fear of harm based on his sexual orientation, HIV status, ethnicity, and political opinion. Pro bono counsel will also need to determine whether E. is eligible for citizenship in Armenia and, if so, address why E. could not live safely in Armenia. E.'s partner, S. (22-0159964), is also seeking asylum, but has an entirely separate case. USCIS must receive E.'s asylum application by September 2, 2023. All supporting materials must be filed with the Chicago Asylum office one week prior to his interview, which could occur within four to six of weeks of filing his asylum application.

13. S. is a gay man from Russia. S. speaks Russian and Chicago. S. USCIS must receive his affirmative asylum by September 2, 2023. (22-0159964)

S. knew he was gay at age 14. S. remained closeted because people at work and in his life were not accepting of gay people. In 2013, a group of unknown assailants stopped S. in the street, beat him up, and looked through nude photos and messages with men on S.'s phone. The group stole his phone. S. went to the ER and filed a police report. S. did not tell the police he is gay due to fear of how they would react. S. met his partner, E., through a dating app about three years ago. E. (22-0160137) is also seeking asylum, but has an entirely separate case. Based on both his and E.'s experiences in Russia, S. fears living in Russia as a gay man. He fears Russia will force him to fight against Ukraine if he returns, and he opposes the war. S. was born in Kazakhstan, so pro bono counsel will need to determine whether he is eligible for citizenship in Kazakhstan and, if so, address why he could not live safely in Kazakhstan. USCIS must receive E.'s asylum application by September 2, 2023. All supporting materials must be filed with the Chicago Asylum office one week prior to his interview, which could occur within four to six of weeks of filing his asylum application.

14. T. is a woman from Haiti. She lives with her partner, W., and his two children, V. and Z. T. and W. will require separate applications. They live in a northern suburb of Chicago and speak Haitian Creole. (22-0155059).

T. worked as a nurse in Haiti. She was also a leader in a women's rights organization that provides support to women and girls affected by domestic violence. As women's rights activists,

T. and her colleagues voiced opposition to the Haitian government's policies and actions regarding violence against women. The police beat T. multiple times for her participation in political demonstrations. T. also received death threats from the government because of her activism. T. fled Haiti after some of her women's rights colleagues were killed by the government. On her way to the United States, T. met her current partner, W. and his children, V. and Z., who are also from Haiti. They were all paroled into the United States in September 2021. Their NIJC attorney timely filed their asylum applications with the Asylum Office. They are now waiting for their asylum interviews to be scheduled. Although T. and W. are both seeking asylum, their claims are independent from one another, and they will be scheduled for different interviews. Because of this, NIJC is seeking representation for them separately. All supporting documents will be due to the Asylum Office one week before T.'s interview, which may be scheduled at any time.

15. W. is a man from Haiti. He lives with his two children, V. and Z., and his partner, T. They live in a northern suburb of Chicago and speak Haitian Creole. (22-0155637) (22-0157686) (22-0157680).

W., V., and Z. are Jehovah Witnesses, and their religion prohibits them from becoming involved in politics. After W. refused to assist a political party due to his religious beliefs, the party threatened and attempted to kill W., V., and Z. This prompted them to flee Haiti. On their way to the United States, W. met T., his current partner. T., W., V., and Z. were all paroled into the United States in September 2021. Their NIJC attorney timely filed their asylum applications with the Asylum Office. They are now waiting for their asylum interviews to be scheduled. Although T. and W. are both seeking asylum, their claims are independent from one another, and they will be scheduled for different interviews. Because of this, NIJC is seeking representation for them separately. All supporting documents will be due to the Asylum Office one week before W., V., and Z.'s interview, which may be scheduled at any time.

Asylum: Based on Domestic and Gender Violence

16. 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, Illinois. (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 an 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.

17. 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, Illinois. (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 Y. 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, which has not yet been scheduled.

18. 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, Illinois. (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, R.'s ex-partner attacked her with a machete. R. has two children who remain in Mexico with their paternal grandparents. Although R. 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. For this reason, 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.

19. J. is a woman from Ecuador. Her daughter, S. is a derivative on her application for asylum and is also independently eligible. They speak Spanish and live in Chicago, Illinois. (21-0150688) (21-0151647)

When J. was a young woman, she met her first partner and the 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, the father of her third child, S., 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 together with J.'s daughter S. as soon as they had the money to do so. J. and S. arrived in the United States in July of 2021. Although they 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. Until their NTAs are filed with the court, USCIS retains initial jurisdiction over their cases. NIJC timely filed their asylum applications 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.

20. L. is a woman from Cameroon. She, her partner O., and their daughter, B., have a Master Calendar hearing scheduled for February 27, 2024. The family speaks French and lives in Chicago. (22-0155670) (22-0155648) (22-0155672)

L. was forced into marriage as a child. Her husband routinely raped and abused her. He threw their newborn baby against the wall, killing the infant. After several years of horrific abuse, L. escaped and relocated to another city, but was left homeless. While on the streets, she suffered multiple rapes. A woman found L. and offered her a place to stay, but the woman's husband also raped L. The woman and her husband then trafficked L. to Brazil, promising L. work as a maid in a family member's home, but instead forcing her into a life of prostitution. While in Brazil, L. met O., who had fled Cameroon several years prior to escape political persecution. O. helped L. escape the forced prostitution, and the two relocated to another city in Brazil. After giving birth to their daughter, B., L. learned that her traffickers, who are members of the Nigerian mafia, continued to search for L., O., and B. and intended to kill them. Fearing for their lives, L., O., and B. fled to the United States. NIJC timely filed their applications for asylum with the Chicago Immigration Court. Their pro bono attorneys should be prepared to argue, with NIJC support, that the firm resettlement bar does not apply to their cases. All filings will be due 15 days prior to their merits hearing, which has not yet been scheduled.

21. M. is a woman from Mexico. Her daughter, Y., is a derivative on her application and is also independently eligible for asylum. M. and Y. speak Spanish and live in West-central Illinois. (22-0155215) (22-0155600)

M. endured many years of physical, emotional, and sexual abuse by her husband in Mexico. He gradually became more violent towards her over time. He threatened her with a machete and once, broke a number of items in their home including her cellphone, leaving her without a way to communicate. M.'s husband verbally and emotionally abused their daughter Y. as well. M. and Y. escaped Mexico in 2022. After they fled, M.'s husband threatened to kill her. Although M. and Y. 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.

22. H. is a woman from India. She and her husband, B. filed their applications pro se with USCIS. After they were interviewed at the Chicago Asylum Office, their cases were

referred to court. This family speaks Hindi and lives in Chicago, Illinois. (21-0148068) (21-0148404)

H. was sexually assaulted by her uncle when she was a young girl. As an adult, H.'s uncle sexually assaulted her again. H.'s uncle also threatened to abuse H.'s daughter, a minor. After H. reported her uncle to the police, he threatened to harm her and kidnap her daughter. H.'s uncle is an influential community member and the police are unable to protect H. and her family. H. and her husband are currently in removal proceedings before the Chicago Immigration Court; there are no future hearings scheduled in their cases. All filings will be due 15 days prior to their merits hearing, which has not yet been scheduled.

23. G. is a young woman from Honduras. Her son, P., is a derivative on her asylum application. Their next Master Calendar hearing is on January 31, 2024. G. and P. speak Spanish and live in Northcentral Indiana. (21-0152262) (21-0152568)

G. met P.'s father in about 2018 and moved in with him. Throughout their relationship, P.'s father T. controlled G.'s actions, dictating what she wore and locking her in the house. T. abused G. physically and emotionally. G. escaped T.'s house, but T. broke into the house where G. was living and forcibly took P. from her, demanding that G. return to his house. With help from family members, G. recovered P. and they moved to a different town in Honduras to hide from T. G. began a relationship with another man, but feared that T. would never allow her to be free of him, and that T. would again take P. from her. Afraid of what T. would do next, G. and P. fled Honduras and arrived in the United States in the winter of 2021. NIJC timely filed their applications for asylum. All affidavits and supporting materials will be due 15 days prior to their merits hearing, which has not yet been scheduled.

24. D. is a woman from El Salvador. Her son W. and daughter K. are derivatives on her application for asylum and are also independently eligible. D., W. and K.'s next Master Calendar hearing is on February 14, 2023. D. and her children speak Spanish and live in Northcentral Indiana. (22-0153805) (22-0154693) (22-0154694)

D. and her son W. are from El Salvador. D.'s daughter, K., was born in Mexico. In about 2009, D. fled to the United States to escape W.'s father who abused and threatened to kill her. D. left her son, W., under the care of her mother, a devout Jehovah's Witness. In the United States, D. met Y., the father of her daughter, K. Y. convinced D. to go to Mexico with him. In Mexico, Y. severely sexually and physically abused D. With Y.'s consent, doctors sterilized D. while she was unconscious during K.'s birth. Y. physically abused K. as well. Meanwhile, D.'s mother and family refused to let her communicate with her son, W., because D. had left the Jehovah's Witness church. D.'s mother forced W. to practice her religion against his will. After multiple attempts to escape Y., D. fled to a women's shelter and reported the abuse to the authorities in Mexico. Y. was in jail for a short period of time. In 2021, D. reconnected with W. and learned that a gang in El Salvador threatened W. when he refused to join their gang. W. fled El Salvador and reunited with D. in Mexico. Fearing Y.'s release from jail in Mexico and W.'s father in El Salvador, D. and her children fled to the United States in December 2021. NIJC timely filed D., W., and K.'s applications for asylum with the immigration court. All affidavits and supporting

documents will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

25. K. is a woman from Afghanistan. Her Master Calendar hearing is set for November 13, 2023. She speaks Dari and lives in Chicago. (22-0159745)

Before the Taliban took over, K. was an athlete and worked as a photographer. Her athletic activities are considered men's activities, so she frequently had to dress in "boys' clothes" to avoid harassment. Once the Taliban took over, K. had to stop leaving her house to continue her photography and sports because the Taliban had threatened other photographers and athletes. She fears that the Taliban will harm or kill her because she does not conform to their views on women. K. also fears being targeted for the artistic and cultural activities of various family members. Her mother has been threatened with arrest for working as a bookseller. NIJC timely filed K.'s asylum application. She is scheduled for a Master Calendar Hearing before the Chicago Immigration Court on November 13, 2023.

26. B. is a woman from El Salvador. Her son L. is a derivative on her application. B. and L.'s next Master Calendar hearing is on August 2, 2023. B. speaks Spanish and lives in Central Indiana. (22-0159762) (22-0159886)

L.'s father, T., is a Barrio 18 gang member in El Salvador. T. forced B. to be his woman. He physically and sexually abused B. and kept her isolated in his home, threatening to kill her if she left him. B. tried to end the relationship, but in response T. cut her with a knife so that she has a lasting reminder that she can never leave him. T. was eventually arrested by police officers. In their pursuit of T., police officers beat B. while she was pregnant and accused her of also being part of the gang. While T. was in jail, he sent fellow gang members to stalk and threaten B., letting her know that they had orders to kill her if she left him. B. also fears rival gang members, who have threatened to kill her because they believe she is T.'s woman. B. and L. fled El Salvador when they heard that T. would be released from jail. T. was released from jail a few days after B. and L. fled El Salvador. B. and L. entered the United States after escaping a Mexican cartel that kidnapped them for two months. NIJC timely filed their applications for asylum. All affidavits and supporting materials will be due 15 days prior to their merits hearing, which has not yet been scheduled.

27. 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 R. was teenager, she moved in with an older man who was physically abusive. She had her first child, K., as a teenager. To escape the abuse, R. 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. R.'s brother 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. NIC timely their asylum applications 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.

28. L. is a man from Cuba. He speaks Spanish and lives in the Western suburbs of Chicago. (22-0155448)

L. attended anti-government protests in July of 2021. A few days later, police arrived to his house and began threatening him, telling him he would have to pay 200 pesos otherwise he was going to be jailed. Eventually, L was jailed and detained for about 3-4 days. Fearing that he would be jailed again, he decided to leave for the United States. L. received a Notice to Appear, but it has not yet been filed with the court. Unless his NTA is filed with the court, his asylum application will need to be filed with USCIS before March 30, 2023. After 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 merits hearing.

Asylum: Based on Gender Identity or Sexual Orientation

29. M. is a bisexual man from Colombia. He speaks Spanish and lives in Chicago, Illinois. M. has a master hearing scheduled for March 20, 2023, and has a one-year filing deadline of April 2, 2023. (22-0159589).

Shortly after M. was born, his father was murdered and never investigated by Colombian officials. From a young age, M. had been perceived to be LGBT. A neighbor molested him on several occasions. While in school, M. remembers being called homophobic phrases and slurs. Throughout the rest of M.'s childhood, he was fearful to openly express his sexual orientation. Around May of 2021, M. and his partner at the time started to experience discrimination from their neighbors for holding hands in public. A few months later, M. and his partner became victims to police brutality. The police tortured them at the police station and called them homophobic slurs. After M. was released, he knew he had no choice but to flee Colombia. Pro bono counsel must file M.'s I-589 with the Chicago Immigration Court prior to April 2, 2023. At M.'s master calendar on March 20, 2023, he will be set for a merits hearing. While the hearing date is ultimately up to the judge, pro bono counsel may be able to advocate for a timeline that works well for both pro bono counsel and M.

30. M. is a bisexual man from Peru. He speaks Spanish and lives in Chicago, Illinois. M. is waiting to be scheduled for a Master Calendar hearing and has a one-year filing deadline of June 18, 2023. (22-0155931).

M. was raised to believe that homosexuality was wrong. From a young age he didn't disclose his sexual orientation out of fear that he could be harmed. Around the beginning of the year 2022, a group of men forced M. in a vehicle and raped him. While M. was sexually assaulted, they made references to his sexual orientation and political involvement. M. knew he could not file a police report because of his LGBT identify, leaving him no choice but to flee for his life. After M. was

no longer in Peru, his sister was targeted and asked about M.'s whereabouts. M. entered the United States in June 2022, was detained, and then released on parole. His daughter recently arrived in the United States; her case will be consolidated with his, and pro bono counsel will represent her as well. Pro bono counsel must file M.'s I-589 prior to June 18, 2023, before the Chicago Immigration Court. All affidavits and supporting materials for M.'s case will be due 15 days prior to his individual merits hearing, which has not yet been set. If M. and pro bono counsel agree, counsel can file a motion to set this case for merits once the I-589 has been filed.

31. J. and M. are lesbian women from Venezuela. They both speak Spanish and live in a suburb of Chicago, Illinois. (21-0152224) (21-0152225)

From a young age, J. was bullied in school by peers who suspected that she was a lesbian. J.'s family was extremely religious, and when they learned of her sexual orientation, they beat and attempted to exorcise her before kicking her out of the house. Around 2019, J. moved to Chile to be with M., a Venezuelan woman she met online. M.'s family had fled Venezuela due to her dad's work and civil unrest at the time. M. had also previously participated in protests in Venezuela. M. had previously attempted to enter the U.S. in 2019, but she was detained at the airport and returned to Venezuela. She then went to Chile. In Chile, J. and M. were called homophobic slurs and were attacked by a group of men. They decided to come to the United States in order to live safely and freely. They entered the U.S. and were detained in August 2021. Upon being released from detention, both J. and M. were issued Notices to Appear (NTAs) by the Department of Homeland Security (DHS), but they have not yet been filed with the immigration court. Until their NTAs are filed with the court, USCIS retains initial jurisdiction over their cases. NIJC timely filed J.'s and M.'s skeletal asylum applications with USCIS. Once their NTAs are filed with the court, they will be placed into court proceedings. With NIJC support, pro bono attorneys will need to argue that there is not a firm resettlement issue in their case due to lack of permanent residency status in Chile. All filings will be due 15 days prior to their merits hearing, which has not yet been scheduled.

32. X. is a gay man from El Salvador. He speaks Spanish and is living with a sponsor in San Jose, California. (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. Accordingly, NIJC has already filed a pre-hearing statement and all evidence in X.'s case. 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. NIJC is seeking the assistance of pro bono counsel to represent X. in court at this hearing. Pro bono counsel will review all previous filings, prepare X. and prepare X. his witnesses for the

merits hearing.

33. S. is a bisexual man from Ghana. He speaks English and lives in Chicago, IL with his fiancé, R. and their son, D. (22-0155411) (22-0155206) (22-0155624)

S was attacked by a group of vigilantes who cut him with a knife, which left a scar on his chest. His then-girlfriend, R., who pregnant with their child, was also attacked by the group; they pushed her to the ground and beat her. They told her they didn't want the child to end up like their father, because he is gay. Fearful of future attacks, S. and R. left Ghana and came to the United States. R. gave birth to their son, D., in Guatemala. Their asylum applications were timely filed. 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. They are scheduled for a master calendar hearing on November 17, 2023.

34. P. is a lesbian woman from Venezuela. She speaks Spanish and lives in Chicago, Illinois. P. is scheduled for a Master Calendar hearing on August 1, 2023. (22-0155956)

When P. was a teen her family learned she was in a relationship with another girl. They isolated P. and sent her to meet with pastors and a psychologist in order to change her sexual orientation. After moving to another city for university, P. started a campaign to support young people questioning their sexual orientation. P. was attacked and received death threats because of this work. Later, the father of P.'s ex-girlfriend threatened to kill P because of her sexual orientation and advocacy for LGBT rights. After graduating, P. worked as an architect but eventually left her job because of discrimination and threats based on her sexual orientation. She continued to participate in political campaigns and protest against the government. Guerrilla groups threatened to kill and/or imprison her because of her political views and her sexual orientation. Pro bono counsel must file P.'s asylum application prior to January 5, 2023, before the Chicago Immigration Court. 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 Venezuela. In addition, her pro bono attorney should be prepared to argue, with NIJC support, that the firm resettlement bar does not apply to her, as she may have birthright citizenship in Colombia.

35. O. is a bisexual man from Nicaragua. He speaks Spanish and lives in Northern Indiana. His asylum application must be filed by January 9, 2023, and is scheduled for a Master Calendar hearing on August 17, 2023, before the Chicago Immigration Court. (22-0155907).

In O.'s early adulthood, he worked for the Nicaraguan government's public health department. As a government employee, on a few different occasions he was either forced to vote for the Sandinista National Liberation Front ("Frente Sandinista de Liberación Nacional") or prohibited from voting. He was later targeted by the Sandinista Youth ("Joventud Sandinista"), the youth wing to the Sandinista National Liberation Front. After attempting to resign in October of 2021, they threatened him by saying that quitting would make him an enemy of the government. In

November of 2021, O.'s ex-partner's father discovered of their relationship and threatened to kill O. That same month, he was sexually assaulted by another man. O. fled Nicaragua. The Chicago Immigration Court must receive O.'s asylum application no later than January 5, 2023. All affidavits and supporting materials for O.'s case will be due 15 days prior to his individual merits hearing, which has not yet been set. If O. and pro bono counsel agree, counsel can file a motion to set this case for merits rather than waiting to receive a date at P.'s August master calendar hearing.

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

36. 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, Indiana. (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, J. 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.

37. 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, 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 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.

38. 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, Illinois. (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.

39. 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, 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. Because he filed more than one year after his arrival, K.'s pro bono attorneys will need to argue that he merits an exception to the one-year filing deadline. NIJC will assist them in making that argument. All affidavits and supporting materials to K.'s case will be due 15 days prior to his individual merits hearing, which has not yet been scheduled.

40. A. is a man from Cuba. A.'s wife L. will be a derivative on his asylum application and is also independently eligible for asylum. A. and L. speak Spanish and live in a southern suburb of Chicago, Illinois. (21-0150113) (21-0148960).

A. was drafted for military service. 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 him 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.

41. J. is a man from El Salvador. His son, D., is a derivative on his application and is also independently eligible for asylum. J. and D. are waiting for their merits hearing to be scheduled. J.'s wife, R., and her daughter, C., came to the United States following J.'s arrival. R. and C.'s next Master Calendar Hearing is on November 17, 2023. The family speaks Spanish and live in Indianapolis, Indiana. (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 C., J.'s stepdaughter, 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 R. and her colleagues 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.

42. 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 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 A.'s young daughter, B., if she 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.

43. 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. Their next Master Calendar hearing is on July 17, 2023. 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 *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. NIJC timely filed their asylum applications. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

44. 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 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.

45. 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, 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 15 days prior to their individual merits hearing, which has not yet been scheduled.

46. 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, Illinois. (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. Because his application was filed more than one year after he entered the United States, M.'s pro bono attorneys will need to argue that he merits an exception to the one-year filing deadline. NIJC will assist them 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.

47. 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, Illinois. (20-0143706) (20-0145601) (21-0145598)

V.'s former partner, K., is a gang member in Honduras. During their relationship, K. physically and sexually abused V., 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.

48. 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, Illinois. (21-0146760) (21-0147488)

S.'s step-father abused her throughout her childhood. The father of S.'s first child also 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.

49. A. is a woman from Guatemala. Her four children are derivatives on her application for asylum. A.'s 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 family speak 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 that 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.

50. L. is a woman from Venezuela. She is awaiting a new Master Calendar hearing date. L. speaks Spanish and lives in Chicago, Illinois. (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 after her interview with the asylum office. 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.

51. 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 18th 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 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.

52. 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, Indiana. (21-0146095)

R.'s partner was a member of the MS-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. R. 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.

53. N. is a woman from Honduras. N. speaks Spanish and lives in a northwestern suburb of Indianapolis, Indiana. (21-0147272)

N.'s partner, and the father of her third child, was abusive and controlling. He raped N. and told her that 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.

54. 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, Illinois. (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 and became pregnant. Once he learned of her pregnancy, V.'s partner began to verbally and physically abuse her. He tried to force V. to have an abortion. During this time, V. was living in her partner's home, where his family members also abused her and eventually caused 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 son, X., and later gave birth to her second child in the United States. Although V. and X. 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, V. and X. will be placed into court proceedings. All affidavits and supporting materials will then be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

55. 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 L. speak Haitian Creole and live in Indianapolis, Indiana. (21-0148754) (21-0149461)

R. was a member of a prominent political party in Haiti and her former partner was an organizer with the same party. Suspected individuals from a rival political party burned the family's home to the ground after threatening R.'s 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, R. and L. will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled. R. and L. are independently eligible for Temporary Protected Status (TPS) and have TPS applications currently pending before USCIS.

56. 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, Illinois. (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 S.'s wife, 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. After this, 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.

57. E. is a young man from Guatemala. His next Master Calendar hearing is scheduled on October 4, 2023. E. speaks Spanish and lives in Chicago, Illinois. (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 in immigration court on October 4, 2023. NIJC timely filed E.'s skeletal asylum application with USCIS. Affidavits and other supporting documents will be due one week prior to his interview at the asylum office, which could be scheduled at any time.

58. 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 on April 30, 2024. M. and J. speak Spanish and live in Indianapolis, Indiana. (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 the police did not hold M.'s abuser accountable. After she separated from her abuser, M. was robbed at gunpoint by armed men. Then, gang members began extorting M., and threatened to kill her if she did not pay them. M. reported these threats to the police, but the gang continued to extort and threaten Ms. until she and her son, J., fled Honduras. At the United States-Mexico border, M. and J. 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 in immigration court. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled. M. and J. are independently eligible for T Visas because M. was the victim of human trafficking in the United States. NIJC will handle the preparation and filing of their T Visa applications in coordination with their pro bono counsel.

59. S. is a woman from El Salvador. Her daughter, A., is a derivative on her asylum application and is also independently eligible for asylum. Their next Master Calendar hearing is on May 24, 2023. S. and A. speak Spanish and live in Chicago, Illinois. (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. Many of the patrons were Salvadoran gang members. S.'s ex-partner threatened that they would find and harm S. if she disobeyed him. S. escaped with A. and came to the United States in July 2018. NIJC filed S. and A.'s applications for asylum 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. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

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

As a university student in Nicaragua, P. helped form a political organization that advocates for democracy, justice, and human rights. P. was active in the organization as a leader and participated in public demonstrations in opposition to Nicaraguan government policies. P. fled the country after pro-government forces threatened, detained, beat, and tortured him. 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. NIJC timely filed his skeletal asylum application with USCIS. Once P.'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, which has not yet been scheduled.

61. C. is a woman from Venezuela. C. speaks Spanish and lives in a western suburb of Chicago, Illinois. (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. C. refused orders to work at a demonstration, and her supervisors punished her and prohibited her from resigning as a result of her opposition. 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, C. will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing, which has not yet been scheduled.

62. 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 K. 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 T.'s parents fled, they learned that their house had been burned down. NIJC filed K., M., and P.'s 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.

63. R. is a woman from Honduras. Her two children, S. and E., are derivatives on her application for asylum. Their next Master Calendar hearing is scheduled for August 3, 2023. 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. NIJC timely filed their asylum applications. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

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

G. began receiving threats from her aunt's ex-partner because G. and her family refused to tell him where her aunt was after she fled Honduras. Another one of G.'s aunts was kidnapped by a local gang leader related to her aunt's ex-partner. Gang members tortured this aunt and left her for dead. G. and her partner, R., fled with her family to Mexico, but while in Mexico, G. began to receive threatening, anonymous messages from gang members stating that they knew the family's whereabouts and would make them pay for disobeying. G., R., and E. were issued Notices to Appear (NTAs) by the Department of Homeland Security when they entered the United States, but their NTAs have not yet been filed with the immigration court, so USCIS retains initial jurisdiction over their applications for asylum. NIJC timely filed G., E., and R.'s asylum applications with USCIS. Once their NTAs are filed with the court, they will be placed into removal proceedings. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

65. 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, Indiana. (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 when possible. P.'s family received many threats due to their involvement, and one day a group of armed men came into their home, beat up P.'s father, put a gun to his head, and threatened to kill him and his family if he continued his political involvement. When he did not quit his political party, his family continued to receive threats. Later, a previously incarcerated gang member forced P. into relationship with him. For several years, he regularly raped and tortured her. Eventually, P. escaped and moved to Chile, where she lived for a few years with the

father of her children. However, Haitian migrants were regularly attacked and killed in Chile. After P.'s children's father began to abuse her, P. decided to flee to the United States with her daughter, O. NIJC filed a skeletal 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 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.

66. L. is a man from Congo (Brazzaville). His wife, R. and his daughter, N., are derivatives on his application for asylum. They are also independently eligible for asylum. They are currently scheduled for a Master Calendar Hearing before the Chicago Immigration Court on October 4, 2023. L. and his family speak French and live in Chicago, Illinois. (21-0151916) (21-0152424) (21-0152425)

L. lived in Congo with his wife, R., and his daughter, N. L. was a member of an opposition party in Congo and was targeted after attending a protest. Congolese police officers followed L. and ordered him to appear for questioning. After L. failed to appear, police officers arrived at his home, attacked him, and raped his wife and his daughter. L. was then detained and tortured. After L. was released, he and his family fled to Brazil. L., R., and N. arrived in the United States around June 2021. NIJC timely filed asylum applications for L., R., and N. with 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.

67. C. is a woman from Cameroon. Her next Master Calendar hearing is scheduled for April 17, 2023. C. speaks French and lives in Chicago, Illinois. (22-0153318)

C. was physically and emotionally abused by the father of her children for over 20 years. C. is Catholic. Her children's father abused her because she refused to convert to Islam and to change her name to an Islamic name. C. experienced abuse weekly and tried to escape several times, but her abuser found her every time and forced her to return to him. C. eventually fled to the United States. NIJC timely filed C.'s asylum application with the Chicago Immigration Court. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing, which has not yet been scheduled.

68. B. is a man from Cameroon. B.'s next Master Calendar hearing is scheduled for January 25, 2024. B. speaks English and lives in Chicago, IL. (22-0153514)

B. was scouted to be an informant for the government in Cameroon but refused. The police detained and tortured B. for not cooperating with government orders. B. fled the country to Turkey, where he was able to obtain a temporary Turkish residency permit that was renewed yearly. B. eventually fled to the United States due to fear that his temporary status was going to be revoked in Turkey and he would be deported back to Cameroon. With NIJC support, B.'s pro bono attorneys will need to argue that there is not a firm resettlement issue in B.'s case due to lack of permanent residency status in Turkey. B. timely filed a pro se asylum application. 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.

69. T. is a woman from Nicaragua. T. speaks Spanish and lives in a suburb of Chicago. (22-0153258)

In 2018, when T. was at university, she participated in a protest against the government. Afterwards, she began to receive threats. T. was attacked several times and warned that if she continued to participate in protests, she would be killed. After receiving these threats, T. fled to Panama, where her sister was living. She applied for refugee status there, but her application was denied. After she and her sister were threatened and assaulted because of her sister's work as a political activist, they fled to the United States. Although T. was issued a Notice to Appear (NTA) at the border, it has not yet been filed with the immigration court. Until her NTA is filed with the court, USCIS retains initial jurisdiction over her application for asylum. NIJC timely filed T.'s asylum application with USCIS in December 2022. Once her NTA is filed with the court, T. will be placed into court proceedings. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing, which has not yet been scheduled.

70. B. is a woman from Nicaragua. B. speaks Spanish and lives in a suburb of Chicago. Her two sons will be derivatives on her asylum application. Her next master calendar hearing is set for October 6, 2023. (22-0153531).

B. was physically, sexually, and emotionally abused by her partner, T. T. controlled B.'s movements, would not allow her to work, accused her of being unfaithful, and cut her off from her family and friends. After B. got pregnant with their second child, T. wanted B. to get an abortion and told her that if she refused to do so, he would leave her and she would never see him again. After B. refused to get an abortion, T. beat her and punched her in the stomach. T. then abandoned B. and her children. In 2015, B. moved to Panama in order to try to better support her children. She started working as a political activist there, and campaigned for Medardo Mairera, a Nicaraguan opposition candidate. B.'s role involved organizing Nicaraguans in Panama and advocating for a change in Nicaraguan leadership. B.'s name was placed on a "black list" and individuals at the Panamanian embassy threatened to deport her to Nicaragua if she continued to speak out. After receiving these threats, B. fled to the United States with her sister and her two sons. B. and her children were placed into court proceedings. Their next Master Calendar hearing is scheduled for October 6, 2023. NIJC timely filed B.'s asylum application in December 2022. All affidavits and supporting materials will be due 15 days prior to her individual merits hearing, which has not yet been scheduled.

71. F. is a woman from Nicaragua. Her daughter, R., and her husband, M., are derivatives on her asylum application and are both independently eligible for asylum. Their next Master Calendar hearing is scheduled for October 20, 2023. They speak Spanish and live in Chicago, Illinois. (22-0155383) (22-0155381) (22-0155598)

F., M., and R. were all threatened by F.'s ex-partner who is a member of the Nicaraguan paramilitary. He and other armed paramilitary members threatened to kidnap R. and beat M. in the street. F.'s ex-partner refused to accept that F. was in another relationship and threatened to kill M. Separately, armed paramilitary members tried to force M. to join them and support the current administration in Nicaragua. M. refused several times because they support the

opposition party in Nicaragua. Armed paramilitary members went to their home and threatened to harm M. and report him to the Nicaraguan police. F., R., and M. fled to the United States. NIJC timely filed their asylum applications. All affidavits and supporting materials will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

72. K. is a woman from Mexico. K.'s son, E., is a derivative on her application. K.'s mother, F., father, A., and grandmother, L., are independently eligible for asylum. Their next Master Calendar hearing is January 17, 2024. K., F., A., L., and E. speak Spanish and live in Chicago. (19-0132005) (19-0132459) (19-0132536) (19-0132566)(19-0132576)

Members of a cartel murdered K.'s uncle while he was with K.'s brother. During the wake for K.'s uncle, cartel members stormed into the family home and opened fire on the crowd gathered to pay their respects. The cartel members killed K.'s brother and L.'s partner, along with several others. K. recognized three of the shooters and collaborated with local law enforcement officers to identify them. While K. reported the crime, cartel members stormed into K.'s house and opened fire. Fearing for their lives, F., L, K., and E. fled to a nearby state in Mexico. After they fled, cartel members stalked K. and threatened to kill K. and her entire family if she did not stop the investigation. K. continued to cooperate with local law enforcement officials in the investigation of her brother's murder, but officials advised F., K., L., and A. to flee the country to avoid being killed by the cartel members. NIJC timely filed asylum applications for K., F., L., and A. with the immigration court. K.'s son, E., is a derivative on K.'s application. Their next master calendar hearing is on January 17, 2024. All supporting documents will be due no fewer than 15 days before their individual merits hearing, which has not yet been scheduled.

73. J. is a woman from Mexico. Her master calendar hearing is on April 18, 2024. She speaks Spanish and lives in a southwest suburb of Chicago. (19-0138773)

Members of a drug cartel murdered J.'s sister. J.'s family reported the murder to police, who eventually arrested several cartel members in connection with the murder. When the cartel members were released from jail, they stalked and threatened J. and her family members. They threatened to kidnap J.'s nephews, the sons of J.'s slain sister. Fearing for their lives, J. and her family fled to another city in Mexico, but cartel members continued to call and threaten J., so she fled to the United States. NIJC timely filed an asylum application for J. Her next master calendar hearing is on April 18, 2024. All supporting documents will be due 15 days before her individual merits hearing, which has not yet been scheduled.

74. E. is a woman from Guatemala. Her daughters, C., A., and N. are derivatives on her application. N. is also independently eligible for asylum. Their master calendar hearing is April 30, 2024. (20-0141426)(20-0141432)(20-0141994)(20-0141997)

Members of an organized criminal group in Guatemala tried to force E.'s daughter, N., into prostitution. When N. and E. refused, the criminal group threatened to kidnap N. Fearing for her life, N. fled to the United States. After N. fled, the same people who had targeted N. threatened to force E. into prostitution and to kidnap her other daughters. E., C., and A. fled to the United

States to seek safety. NIJC timely filed E.'s asylum application, which includes N., C., and A. as derivatives. NIJC also filed an independent asylum application for N. E.'s next Master Calendar hearing is on April 30, 2024. N. is in separate proceedings and does not have a scheduled future hearing date. E.'s and N.'s pro bono attorneys should be prepared to request that their cases be consolidated. All supporting documents will be due 15 days prior to their individual merits hearing, which has not yet been scheduled.

75. T. is a woman from Honduras. Her daughter L. is a derivative on her asylum application and is also independently eligible for asylum. Their next Master Calendar hearing is on April 13, 2023. T. and L. speak Spanish and live in Northcentral Indiana. (22-0155223) (22-015529)

X. targeted T. and forced her into a relationship when she was a young teenager. He physically and sexually abused her. T. attempted to escape X. by moving in with another man, but X. found them and physically beat T.'s new partner multiple times. When X. discovered T. was pregnant, he pointed a gun at her and told her to choose between him and death. X. believes he is L.'s father, but T. is uncertain. After X.'s threat, T. returned to her mother's house and X. continued to abuse her. Because of actions taken by X. and T.'s brother, T. was arrested and held in jail for over a year in Honduras. She was found innocent of all charges and released. X. was not arrested and told T. that he went to El Salvador. X. sent gang members to stalk T. while he was in El Salvador. MS-13 gang members killed T.'s brother in early 2021. The MS-13 gang demanded that T. pay back her brother's debt. T. and L. fled Honduras when the MS-13 gang threatened that she would not live to see her baby be born if she did not pay the money. T. and L. arrived in the United States in November 2021. NIJC timely filed their applications for asylum. All affidavits and supporting materials are due 15 days prior to their individual merits hearing, which has not been yet scheduled.

Special Immigrant Juvenile Status (SIJS)

76. N. is a 19-year-old girl from Mexico. She lives with her mother, who speaks Spanish, in Chicago, IL (Cook County). (22-0158038)

N.'s father was physically, emotionally, and mentally abusive to her, her mother, and her siblings when they lived with him in Mexico. In 2017, when N. was only 14 years old, N. fled her father's abuse with her mother and siblings. N. has lived in Illinois since 2018. N.'s father has recently moved to Illinois as well, but N.'s father has not provided support for her in the past five years. The pro bono attorney will need to file a post-18 guardianship case on behalf of N.'s mother, asking that the mother be appointed as N.'s legal guardian until N. turns 21. The guardianship order must include findings that N.'s reunification with her father is not viable due to his abuse, abandonment, and neglect, and that it is not in N.'s best interest to return to Mexico.

NIJC Announcements

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.