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CT Afghan Pro Bono Project (CAAP)

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BASICS OF ASYLUM LAW: Eligibility Standards for Asylum

Jon Bauer

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BURDEN OF PROOF ON THE FACTS – Convincing the Adjudicator of the Truth of the Client’s Story

INA § 208(b)(1)(B) [8 U.S.C. § 1158(b)(1)(B)]:

Applicant bears the burden of proof

“The testimony of the applicant may be sufficient to sustain the applicant’s burden . . . , but only if the applicant satisfies the trier of fact that the applicant’s testimony is **credible**, is persuasive, and refers to specific facts sufficient to demonstrate that the applicant is refugee.”

Even if the applicant’s testimony is credible, **corroborating evidence** may be required. “Such evidence must be provided unless the applicant does not have the evidence and cannot reasonably obtain the evidence.”

STANDARD FOR ASYLUM ELIGIBILITY – meeting the statutory refugee definition

INA § 208(b)(1)(A). Conditions for granting asylum – eligibility:

“The [adjudicator] may grant asylum . . . if the [adjudicator] determines that such alien is a refugee within the meaning of section 101(a)(42)(A).”

“May” means a grant of asylum is discretionary. Asylum is rarely denied as a matter of discretion, however, unless the applicant has committed serious misconduct.

The asylum statute also has some mandatory bars that will result in denial even if the applicant satisfies the “refugee” definition.

STATUTORY DEFINITION OF “REFUGEE”

INA § 101(a)(42)(A) [8 U.S.C. § 1101(a)(42)(a)]:

any person who is outside any country of such person's nationality . . .

and who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of, that country

because of persecution or a well-founded fear of persecution

on account of race, religion, nationality, membership in a particular social group, or political opinion

SOME ATTEMPTS TO DEFINE PERSECUTION

“**[H]arm or suffering ... inflicted** upon an individual ... **to punish** him for possessing a belief or characteristic ... [To qualify as persecution, it must be inflicted] either **by the government of a country or by persons or an organization that the government was unable or unwilling to control.**”

Matter of Acosta, 19 I&N Dec. 211, 222 (BIA 1985)

“[A]n **extreme concept** that does not include every sort of treatment our society regards as offensive. . . . [Persecution requires **more than**] **mere discrimination or harassment** . . . ”

Ghaly v. INS, 58 F.3d 1425, 1431 (9th Cir. 1995)

“Persecution involves . . . the [infliction] of **significant physical . . . harm . . . , or non-physical harm of equal gravity . . . even though the only harm it causes is psychological.** [The court gave, as examples of this, refusing to allow a person to practice their religion, or subjecting a person to a credible and imminent death threat.]

Stanojkova v. Holder, 645 F.3d 943, 948 (7th Cir. 2011)

DIMENSIONS OF “PERSECUTION”

- Severe enough to rise to the level of persecution (more than “mere discrimination or harassment”)
- Targeted at a trait or characteristic of the victim (not random violence or generally harsh living conditions)
- Inflicted by a government or persons or groups the government is unable or unwilling to control

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“Well-Founded Fear”

- Subjective component – genuinely fears persecution
- Objective component – fear is objectively reasonable
 - Regulations: “reasonable possibility” of persecution (8 C.F.R. § 208.13(b)(i)(B)).
 - Supreme Ct.: 1 in 10 chance enough. *INS v. Cardoza-Fonseca*, 480 U.S. 421, 431 (1987)
 - Second Circuit caselaw: “even if there is only a slight, though discernible, chance of persecution.” *Diallo v. INS*, 232 F.3d 279, 284 (2d Cir. 2000).
- Can be shown through evidence of individual targeting, and/or a “pattern or practice” of persecuting people like the applicant
 - 8 C.F.R. § 208.13(b)(iii)

Well-Founded Fear

Mogharrabi test generally applied by the Asylum Office:

- (1) Applicant possesses or is believed to possess a characteristic
- (2) that the persecutor is or could become aware of;
and the persecutor has the
- (3) capability and
- (4) inclination
to punish the applicant for having this trait

Matter of Mogharrabi, 19 I&N Dec. 439, 446-47 (BIA 1987);

Tun v. INS, 445 F.3d 554, 565 (2d Cir. 2006)

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“Nexus” to a Protected Ground

INA § 208(b)(1)(B)(ii):

“To establish that the applicant is a refugee . . . , the applicant must establish that race, religion, nationality, membership in a particular social group, or political opinion was or will be at least one central reason for persecuting the applicant.”

Protected grounds: Race and nationality

Race construed broadly to include race, color, descent, and national or ethnic origin.

Nationality: similarly construed broadly; includes ethnic or linguistic groups, and groups of a common culture or ancestry

Example: Hazaras in Afghanistan

Protected grounds: Religion

Broadly construed to cover any aspect of religious belief or practice

Examples: branches of a religion (e.g., Shi'a Muslims)

atheism

apostacy

refusal to conform to religious norms imposed by the authorities (e.g., manner of dress or behavior for women)

Protected grounds: Political Opinion

Covers views on any matters that relate in any way to government, policies, or politics

Examples: anti-Taliban or pro-Western views; feminism

Imputed political opinion:

Person doesn't actually have to hold the opinion if the persecutor thinks that they do

Examples: people viewed as enemies of the Taliban because of their associations with the U.S. or Western countries;

families of political dissidents

Protected grounds: Membership in a Particular Social Group

Most complex ground; avoid it if you don't need it

To qualify as a PSG, group members must share a characteristic that is **immutable** (something they can't change or shouldn't be required to change);

the group must be **socially distinct** (viewed as a group in that society);

and the group must be defined with **particularity** (have well-defined boundaries)

Examples: LGBTQ

Married women who are unable to leave the relationship

People with disabilities

The Asylum Regulations' Burden-Shifting Dance

8 C.F.R. § 208.13(b)(1)

- An applicant who establishes past persecution based on a protected ground “shall also be presumed to have a well-founded fear of persecution on the basis of the original claim.”

BUT that presumption is rebutted, and asylum can be denied, if DHS shows either that:

- (A) There has been a fundamental change in circumstances such that the applicant no longer has a well-founded fear of persecution in their country; or
- (B) The applicant could avoid future persecution by relocating to a another part of the country and can reasonably be expected to do so

Internal Relocation

8 C.F.R. § 208.13(b)(1)(i)(B), (b)(3)

- Two part test for internal relocation: (1) “the applicant could avoid persecution by relocating to another part of the applicant’s country” and (2) “under all the circumstances, it would be reasonable to expect the applicant to do so.”
- Regulation lists factors that may bear on reasonableness: e.g., civil strife, social and cultural constraints, risks of serious harm
- If no past persecution but only WFF, *applicant* has burden of proof on this issue.
- However, if the persecutor is the country’s government, internal relocation is presumed unreasonable.

Asylum Based on Past Persecution Alone ("Humanitarian Asylum")

Even in the absence of a well-founded fear, asylum may be granted based on past persecution alone if:

(A) there are "compelling reasons arising from the severity of the past persecution" that justify the applicant's unwillingness to return (only for "atrocious" forms of persecution),

or

(B) there is a "reasonable possibility" that the applicant "may suffer other serious harm upon removal to that country." (The future harm does *not* need to be inflicted based on a protected ground.)

8 C.F.R. § 208.13(b)(1)(iii); *Matter of L-S-*, 25 I&N Dec. 705 (BIA 2012)

BARS TO ASYLUM

Application Filed More Than One Year After Last Entry to the United States

- **Exception:** Materially changed circumstances or extraordinary circumstances - 8 C.F.R. § 208.4(a)(4)-(5)
- Maintaining lawful status (including parole) counts as an extraordinary circumstance

Firm Resettlement

- Applicable if a person, after fleeing persecution, spent time in a country where they had a right to remain permanently
- INA § 208(b)(2)(A)(vi); 8 C.F.R. § 208.15

Conviction of a Particularly Serious Crime in the United States

- Includes any “aggravated felony” as broadly defined in INA § 101(a)(43)

Commission of a Serious Non-Political Crime Outside of the United States

- Note: No conviction necessary, just reasonable grounds for believing the person committed the crime
- INA 208(b)(2)(A)(iii)

BARS TO ASYLUM

Safe Third Country Agreement

- Only one is with Canada; if person went there first before coming to the U.S., may be sent to Canada to pursue asylum there

Persecutor of Others

- INA 208(b)(2)(A)(i)

Danger to Security of the United States or Involvement in Terrorist Activity (including providing material support)

- INA § 208(b)(2)(A)(iv)-(v); 212(a)(3)(B)(i)
- Defined broadly, but exemptions available for assistance to Taliban provided under extenuating circumstances:
<https://www.uscis.gov/laws-and-policy/other-resources/terrorism-related-inadmissibility-grounds-trig/terrorism-related-inadmissibility-grounds-trig-situational-exemptions>

Asylum for Afghan Parolees

November 10, 2022

Introduction

During the fall and winter of 2021-2022, over 800 Afghan evacuees were paroled into the United States and resettled in CT by resettlement agencies.

What is parole?

- Humanitarian parole is a temporary legal status that allows an individual to enter the U.S. for humanitarian purposes **for a limited period of time**
- For Afghans paroled through Operation Allies Rescue, the government granted a parole period of two years

The task?

- To obtain permanent lawful status for each of these Afghans
- Three pathways to permanent status for Afghan evacuees:
 1. **Apply for asylum**
 2. Apply for SIV (special immigrant visa) status
 3. Be the beneficiary on a U.S. citizen parent's or spouse's family petition (Form I-130)

Who should apply for asylum?

- Of the 500+ parolees IRIS has resettled, we expect between **140-180 clients** to apply for asylum.
- Getting SIV status may be possible for those Afghans who provided material assistance to the U.S. military in Afghanistan, and we are encouraging anyone with eligibility to apply.
- On asylum filings it is necessary only that the head of household apply, and then he/she can include a spouse and minor derivatives on the application.

The Legal Standard for Asylum



The Legal Standard for Asylum

An alien may qualify for asylum if he can demonstrate that he is a refugee under the Immigration and Nationality Act. Under 8 USC 1101(a)(42)(A), a refugee is:

*Any person who is outside any country of such person's nationality And who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of, that country because of persecution or a well-founded fear of persecution on account of **race, religion, nationality, membership in a particular social group, or political opinion.***

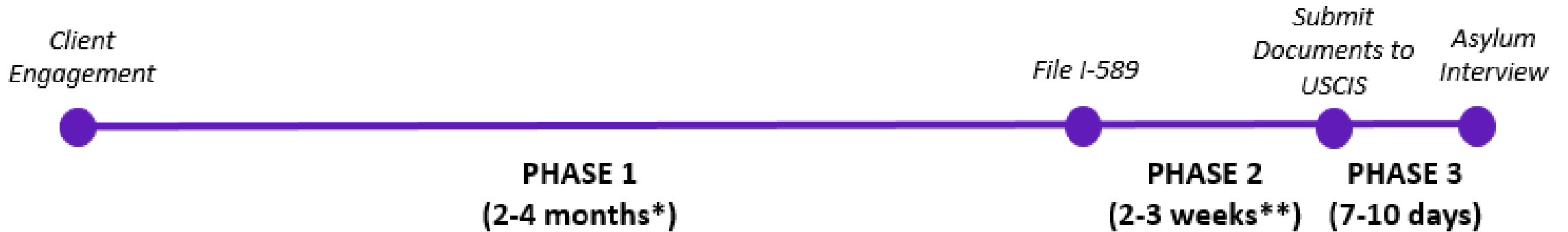
Representing an Asylum Client



What is Form I-589?

- USCIS Form I-589 is the *Application for Asylum and the Withholding of Removal*
- The I-589 collects biographical information and asks questions about the claims the applicant is making: the bases on which the person is filing, and the details of the persecution the applicant has suffered
- The I-589 is the central document the officer will be asking about during the interview

Asylum Timeline



**The time spent on phase 1 can vary significantly depending on various factors, including the filing deadline, the time you and the client have available, your communication style, the availability of supporting documents, etc.*

***This timeframe also varies, depending on when USCIS sends you a Notice of Interview.*

We do want to note that ALL documents can be submitted at the same time you submit the I-589, and it may certainly make more sense to do so if you are filing electronically. In that case, the only step after submission of documents will be waiting to receive a receipt notice and an interview date from USCIS, and then appearing in person at your client's interview. Both ways -- submitting your documents in either one or two phases -- are fine. In other contexts, where we have been trying to get the I-589 in before the one-year deadline, there has been specific reason to submit in two tranches; here, either way is fine.

Phase 1

- Engage an interpreter
 - Call the client with the interpreter
 - Sign a representation agreement
 - Draft the client's declaration
 - Draft Form I-589
 - Develop other case components
 - Compile and submit Form I-589 with supporting documents
-

Calling the Client with the Interpreter

Topics to cover on first call with client

- Explain who you are and why you're calling.
- Describe the asylum process, and what the client can expect in terms of timeframe
- Discuss what is the best way of communicating (Zoom, in person, phone calls), and what meeting times work best for all of you.
- Ask the client what is the best way for him/her to submit documents to you as you progress with the case.

Initially, you should **expect to meet with your client approximately 5-8 times and for 1-2 hours each session.*

**While you may find an interpreter is not necessary after the first call, we have found an interpreter to be useful for most of our clients.*

Signing a Representation Agreement

- Explain that you will be sending a representation agreement. Since it is you or a firm that is representing the client (not IRIS), it is up to you to supply a representation agreement that comports with your firm's practice and defines the scope of the representation. For retired or unaffiliated practitioners, IRIS's malpractice insurance does cover volunteer attorneys.
- If you are not at a firm, or your firm does not have a representation agreement that fits this relationship, IRIS has a sample representation agreement that you can use. IRIS's sample representation agreement has been translated into Dari and Pashto.
- You will need to decide whether your representation will extend beyond the affirmative phase of your client's case.

Drafting the Client's Declaration

- The declaration is a first-person narrative told by the client (and written out by the attorney) that describes what he/she has experienced in the home country.
- The introduction typically gives a brief telling of the person's background (where they were born, parents' names, schooling, etc.), but then goes step-by-step through each event where the person experienced any kind of past persecution.
- If there are no instances of past persecution, the client should explain why he/she has fear of future persecution that would be suffered if forced to return to the home country.
- The details are important, as the USCIS officer evaluating the application will question the client on the statements he/she has made therein.
- The declaration should not include details the client would not be able to recall or discuss during the asylum interview. Your client should be comfortable telling his/her story as it is presented in the declaration.

Drafting the Client's Declaration (continued)

- In the course of drafting the declaration, you will want to be thinking through what the basis of the client's claim may be (the past persecution he/she has suffered and any well-founded fear of future persecution he/she may have).
- The Declaration will be submitted to USCIS in English. If your client does not speak English, budget time to have the declaration translated into your client's native language once it is complete. The reason to do this is twofold. First, your client should confirm the declaration's accuracy prior to submission, since it is a sworn statement by the client. Second, your client should have the declaration in his/her native language so as to review it before the interview. While the idea of reviewing one's own story may seem unnecessary, it is good practice for your client to remember exactly what he/she has attested to.
- A sample declaration for a fictional Afghan applicant can be found in the VECINA curriculum linked [here](#).

Drafting Form I-589

- Once done with the declaration, work with the client to complete the biographical information (the first four pages of Form I-589).
- Complete the substantive portion of Form I-589, drawing from the client's declaration. Unlike the client's declaration, which you want to work on with the client, you can draft Form I-589 yourself, based on what you know of your client's story.

Keep in mind!

Keep in mind that the submission of your I-589 packet is what starts the clock ticking on your case. USCIS has stated that it will schedule asylum interviews for Afghan parolees within 45 days of receipt of an I-589. Whether you are filing by mail or electronically, calculate the time you think you'll need for Phase 2, as described below. Once you submit your I589, you likely have 3-5 weeks before your client is called into USCIS for an interview. As per USCIS instructions, any remaining materials must be submitted to the USCIS Asylum Office no later than 7 days prior to the interview date. That means a good rule of thumb will be to submit the I-589 only when most of your evidence has been assembled.

Developing Other Case Components

In the course of meeting with the client during this period, it is important for the attorney to be gathering any evidence that can support the client's case:

- If the client has any documentary or photographic evidence, the client should submit that to the attorney.
- If your client has physical scars from persecution, you can contact a doctor at the Yale Center for Asylum Medicine to ask for an evaluation and report.
- If your client suffers from ongoing psychological trauma from persecution, you can reach out to us and we can work with you to find referrals for a psychologist or a psychiatrist.
- Declarations from Fact Witnesses: As you learn what your client has experienced, pay attention to who else may have witnessed the events being recounted. If there are **people who can corroborate any aspects of the persecution your client has suffered**, ask your client to request letters from those people recounting relevant events. These supporting declarations should be dated and signed. Assuming these supporting letters are submitted in a foreign language, please ask your interpreter to translate them (and always include a certificate of translation).

Developing Other Case Components (Continued)

It is important to include reports on country conditions to give context and credibility to your client's claims. Additionally, you will summarize these country conditions in a fact section of your cover letter/brief. Always include:

- U.S. Department of State Human Rights Reports for Afghanistan for the most recent year and for any years during which your client suffered persecution
- (If religion is one of your bases), U.S. Department of State Religious Freedom Reports
- Reports from major international human rights non-profits, e.g. Amnesty International or Human Rights Watch
- Any relevant newspaper or journal articles, ideally pertaining as specifically as possible to your client's set of facts

**VECINA produces a weekly compilation of Afghan country conditions resources.*

Developing Other Case Components (Continued)

A legal brief is not required when applying for asylum affirmatively, but many practitioners include one. Given our volume of clients, we are currently submitting abbreviated “cover letter” briefs.

- We’ve provided you a sample, redacted cover letter brief. The letter should give a compelling rendition of the facts followed by a succinct explanation of how the client meets the legal standard for asylum.

Developing Other Case Components (Continued)

Create a Document Index of all the documents you are submitting on your client's behalf.

- We have attached a redacted Document Index, so you can see an example of an index we have submitted on another (non-Afghan) case. This is your chance to organize and showcase evidence, in particular the country conditions that are relevant to your client's claim.

Submitting Form I-589

- Your submission of Form I-589 must include the following:
 - Form I-589 itself, which includes all the Supplement A and Supplement B pages, even if blank
 - A passport photo of the client stapled where indicated, on page 9
 - Copies of **every page** of the client's passport, if they have one
 - Copies of **every page** of the spouse and children's passports (if they are living in the U.S.)
 - The client's Form I-94 (Form I-94 is the U.S. Customs and Border Patrol (CBP) record of admission into this country). You can search for it [here](#).

Submitting Form I-589 (continued)

- Form I-589 must be signed by you and the client.
 - The Supplement A and B pages must also be signed and dated by the client.
 - Read the Form I-589 Instructions for how many copies of the Form I-589 packet to submit to USCIS. **The number varies depending on the number of derivatives included in your client's case.**
 - Form I-589 should be sent in hard copy to the USCIS's California Service Center (address available on the USCIS website) or submitted online. We're providing you with a sample Form I-589 and a scan of redacted copies of a client's passport so you can see what the entire packet should look like.

Submitting Form I-589 Electronically

- Rather than filing in the way set forth above, you can also file an I-589 online by creating a USCIS account.
 - The online portal prompts for specific documents, so some of the formatting we have described for hardcopy submissions is inapplicable (e.g. there are no prompts for attaching a brief or a document index).
 - Filing online may not be suitable for clients who are not tech savvy, since they too are required to create USCIS accounts.
 - *Pros:* no client signatures required; faster submission and receipting times
 - *Cons:* USCIS portals are clunky and prone to glitches; editing information within the portal is very time consuming.

Phase 2

Within 3-4 weeks of filing your I-589, you will receive three pieces of mail from USCIS:

1. Form I-797 Notice of Action indicating your I-589 has been received and accepted.
2. An appointment for your client's biometrics (fingerprinting) to be taken.
3. Interview Notice, specifying the date and time your client is scheduled to be interviewed in-person at the USCIS office in either Newark or Manhattan.

The current rule is that all supporting documents must be received by USCIS at least 7 days prior to the interview.

Please read your interview notice carefully to confirm USCIS's submission requirements at the time that you are filing.

During this period, you should be finalizing any of the documents listed above under Phase 1 that are not yet in final form.

Submit all supporting documents to USCIS by overnight mail.

Phase 3

- Conduct Moot Sessions with your client
- Represent your client at their interview with USCIS

Conducting Moot Sessions

- You will want to schedule at least one and ideally two moot sessions with your client in advance of the interview with USCIS.
- The moot session or sessions are your opportunity to prepare your clients for the kind of questioning he/she will undergo by the USCIS Asylum Officer. During the moot, you or another attorney can roleplay the part of the officer and go through the I-589 as the officer will do during the interview.

Representing your Client at the Interview

- On the day of the interview, the attorney, client, and translator will need to travel to the USCIS Newark Asylum Office (located either in Newark or Manhattan).
- An interview can last anywhere between 2 and 6 hours. Plan to spend the day at the USCIS office!
 - Although USCIS may provide an interpreter by phone, USCIS does not guarantee that an interpreter will be available and reserves the right to reschedule the interview if none is. To ensure that your interview will not be postponed, you should bring an interpreter with you.

The Filing Deadline



The Filing Deadline

- The general rule is that an applicant must file for asylum within **one year** of their most recent arrival in the U.S. At this point in time, nearly all Afghan parolees have been in the U.S. more than one year.
- There are two exceptions to the one-year deadline: *Changed circumstances that materially affect your eligibility for asylum, or extraordinary circumstances directly related to the delay in filing.*
- Section 208.4(a)(5) of the CFR sets forth that the term “extraordinary circumstances” as used in section 208(a)(2)(D) of the Act [the Immigration and Nationality Act] “shall refer to events or factors directly related to the failure to meet the 1-year deadline,” and that “[s]uch circumstances may excuse the failure to file within the 1-year period.”
- One of the circumstances specifically listed in CFR 208.4(a)(5)(iv) is that “[t]he applicant maintained Temporary Protected Status, lawful immigrant or nonimmigrant status, **or was given parole**, until a reasonable period before the filing of the asylum deadline.” The client group at issue here has been given parole.
- *USCIS states on its website that Afghan parolees who file within a reasonable period after their parole expires will be eligible for the exception to the one-year deadline (case law has determined a “reasonable period” to be no more than 6 months).*
- One of the questions on the I-589 asks whether the applicant is filing within one year of their last arrival in the U.S., and if not, requests an explanation. Sample language for an explanation could be: *“Pursuant to 8 CFR § 208.4(a)(5)(iv), I qualify for the extraordinary circumstances exception to the one year filing deadline because I have maintained valid parole status since entering the United States. I was paroled into the United States on [date], and my parole expires on [date].”*

Resources

Web Links

1. [VECINA Curriculum: Affirmative Asylum for Afghan Nationals | Teachable](#)
2. [I-94 Website | U.S. Customs and Border Patrol](#)
3. [Information for Afghan Nationals | USCIS](#)
4. [Asylum 101 for Representing Afghan Parolees Webinar | ABA](#)
5. [Asylum for Afghans 201: Bars to Asylum and Common concerns | ABA](#)

Documents to be Circulated

1. IRIS Representation Agreement (in English, Dari and Pashto)
2. Afghan Country Conditions by topic (VECINA)
3. Redacted Sample Document Index (IRIS)
4. Redacted Sample Copies of Client Passport Pages (IRIS)
5. Redacted Cover Letter Brief (IRIS)
6. Sample Declaration (VECINA)
7. Sample I-589 (VECINA)
8. Certificate of Translation (IRIS)
9. Redacted Interview Notice from the Newark Asylum Office