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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
NEW YORK, NEW YORK

In the Matter of:	)	File No.: A_____
CLIENT, CATHERINE	)	
In Removal Proceedings	)	

Immigration Judge [Terry A. Bain] **Next Hearing: _____, 2018 at 2:30 PM**

MEMORANDUM OF LAW IN SUPPORT OF RESONDENT'S APPLICATION FOR ASYLUM

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Respondent Catherine Client ("Catherine") seeks asylum in the United States. For the reasons set forth below, she meets the statutory requirements for this relief.

PRELIMINARY STATEMENT

Catherine is a 34-year-old Honduran woman and the mother of two U.S. citizen children. See Ex. J ¶ 1. Born in a small village, she moved to the United States at age 20 and returned to Honduras with her children approximately six and a half years later, in March 2009, to care for her ailing mother. Id. ¶¶ 1, 5-6. After her mother passed away, Catherine decided to stay in Honduras to support her elderly father. Id. ¶ 6. About three and a half years later, Catherine met a Honduran police officer named John Abuser as he patrolled her village. Id. ¶ 8. Officer Abuser went to Catherine's house to ask her father's permission to "get to know [Catherine] better." See Ex. K ¶ 6. The couple soon began dating. See Ex. J ¶ 11.

In about February 2013, Officer Abuser began to subject Catherine to severe sexual and physical abuse. Id. ¶ 12. He regularly raped her, including at gunpoint. Id. ¶¶ 13-17. If she resisted or fought back, he hit her, pulled her hair, and threatened to kill her children. Id. ¶ 14. He also told Catherine that he was her "owner," that "he could have [her] whenever he wanted," and that she "would always be his." Id. ¶¶ 13, 16. Indeed, every time Catherine tried ending her relationship with Officer Abuser, he held his gun to her head and raped her. Id. ¶¶ 15-17.

Catherine and her father both tried reporting Officer Abuser to the Honduran police. In about March 2013, Catherine went to police headquarters and reported that someone was threatening her with a gun. Id. ¶ 18. Rather than help Catherine, the police attempted to extort her by demanding 300 Honduran lempiras to start an investigation. Id. Moreover, the police notified Officer Abuser of Catherine's report. Id. In March or April 2013, Catherine's father went to police headquarters and complained that a police officer was "bothering [his] daughter" and "forcing her

to be in a relationship with him." See Ex. K ¶ 16. Once again, the Honduran police did not write a report or take any other steps to protect Catherine. Id.

Catherine was finally forced to flee from Honduras during an attack on April 17, 2013. That day, Officer Abuser put his gun to Catherine's head, threatened to kill her, and simultaneously strangled and raped her. Ex. J ¶ 21. Catherine "couldn't take it anymore" and again tried breaking up with Officer Abuser. Id. ¶ 22. In response, he hit her with his gun, threw her to the ground, and strangled her. Id. When he was done, he took Catherine to her father's house and left her on a bench outside the front door. Id. ¶ 23. Catherine's father later found her with bruises on her face, neck, and chest. See Ex. K ¶ 19. He rushed her to the nearest clinic, id. ¶ 20, where the treating physician found that she suffered "trauma" to her scalp and neck, "an altered state of consciousness," and "a lot of anxiety." See Ex. F.

After Catherine was released from the clinic, Officer Abuser continued to harass her. See Ex. J ¶ 24. Fearing for her safety, she fled to the capital city and hid in an aunt's house. Id. ¶ 25. Given Officer Abuser's connections to law enforcement, Catherine believed it was "only a matter of time before he would track [her] down." Id. ¶26. She decided to flee to the United States. Id. She crossed the U.S./Mexican border without inspection on August 18, 2013. See Ex. A. Thereafter, U.S. immigration officials detained her in Texas. Id. The Department of Homeland Security ("DHS") determined that Catherine had a credible fear of persecution in Honduras based on her relationship with Officer Abuser, see Ex. B, and initiated these removal proceedings through a Notice to Appear dated September 17, 2013, see Ex. A. On August 16, 2014, Catherine filed a timely application for asylum, withholding of removal, and CAT protection. See Ex. C.

Catherine qualifies for this relief. As the Court of Appeals for the Eleventh Circuit recently recognized, "domestic violence is pervasive in Honduras, impunity for perpetrators is common,

and the laws and institutions in place to assist domestic violence victims are largely ineffective." Alonzo-Rivera v. Atty. Gen., No. 15-12382, 649 Fed. App'x 983, 991 (11th Cir. May 20, 2016). This is especially true when the abuser is a police officer. See Ex. Y at 292. Officer Abuser subjected Catherine to past persecution in the form of rape, physical abuse, and credible death threats. Although Catherine and her father both tried reporting Officer Abuser to the police, the Honduran government did not protect Catherine and, instead, placed her at even greater danger by notifying Officer Abuser of her complaint. Catherine experienced her past persecution on account of her membership in three particular social groups ("PSGs"): (i) "Honduran women who are unable to leave an intimate relationship," (ii) "Honduran women who are viewed as property by virtue of their position in an intimate relationship," and (iii) "Honduran women who are unable to leave an intimate relationship with a Honduran police officer." Based on the foregoing, Catherine enjoys an unrebuttable presumption that she has a well-founded fear of future persecution in Honduras. However, even absent this presumption, she qualifies for humanitarian asylum based on the severity of her abuse.

ARGUMENT

A. Catherine Suffered Past Persecution in Honduras When Officer Abuser Raped Her, Beat Her, and Threatened to Kill Her and Her Children

Persecution is the "infliction of suffering or harm on proscribed grounds." Huo Qiang Chen v. Holder, 773 F.3d 396, (2d Cir. 2014). The accumulation of harm from individual incidents may rise to the level of persecution even if the individual incidents do not. Manzur v. U.S. Dep't of Homeland Sec., 494 F.3d 281, 290 (2d Cir. 2007). Furthermore, "[p]rivate acts" may constitute persecution where the government "is unable or unwilling to control" them. Pan v. Holder, 777 F.3d 540, 543-44 (2d Cir. 2015).

In this case, Catherine suffered various harms in Honduras that rose to the level of past

persecution, including, but not limited to, the following:

- ***Rape***: "[R]ape is sufficiently serious to constitute persecution." Mei Fun Wong v. Holder, 633 F.3d 64, 76 (2d Cir. 2011) (internal quotations and citation omitted); see also Matter of A-R-C-G-, 26 I & N Dec. 388, 389 (B.I.A. 2014). In this case, Officer Abuser repeatedly raped Catherine, including at gun point. See Ex. J ¶¶13-14, 16-17, 21.

- ***Physical Abuse***: Evidence of physical abuse provides "significant support" for a finding of past persecution. Rizal v. Gonzales, 442 F.3d 84, 92 (2d Cir. 2006).[1] Here, Officer Abuser hit Catherine with his hands and gun, pulled her hair, and strangled her. See Ex. J ¶¶ 2, 14, 21-22. He once beat her so severely that she was hospitalized. Id. ¶ 23. A physician identified "trauma" to Catherine's scalp and neck and attributed these injuries to "abuse and domestic violence." See Ex. F.

- ***Death Threats***: When combined with other persecutory behavior, death threats may rise to the level of past persecution. See, e.g., Gashi v. Holder, 702 F.3d 130, 138 (2d Cir. 2012) (an applicant suffered past persecution when he was "repeatedly warned, threatened with death, and attacked with deadly weapons including a knife and a metal knob").[2] In this case, Officer Abuser threatened to kill Catherine while holding a gun to her head, see Ex. J ¶ 21, and strangling her, id. ¶¶ 21-22. He also threatened to kill Catherine's children. Id. ¶¶ 14, 17.

Accordingly, Catherine's past persecution is manifest. See, e.g., Lazo-Majano v. INS, 813 F.2s 1432, 1434 (9th Cir. 1987) (persecution is "stamped on every page of th[e] record" where, as here, the applicant was "bullied, beaten, injured, [and] raped" by a military official who used "his gun" and "his authority" to dominate her), overruled on other grounds, 79 F.3d 955 (9th Cir. 1996).

Moreover, the Honduran government was unwilling to control Officer Abuser. When Catherine and her father tried reporting Officer Abuser, the Honduran police did not take any steps to protect her. See Ex. J ¶¶ 18-19; Ex. K 16-18. Instead, they demanded a bribe, see Ex. K ¶ 18,

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[1] See also Pan v. Holder, 777 F.3d 540, 544 (2d Cir. 2015) ("[V]iolent conduct" at the hands of a government actor "generally goes beyond the mere annoyance and distress that characterize harassment." (internal quotations omitted)); Janjua v. Lynch, 13-113 NAC, 620 Fed. App'x 21, 24 (2d Cir. July 1, 2015) (adjudicators must "be keenly sensitive to the fact that a 'minor beating' or, for that matter, any physical degradation designed to cause pain, humiliation, or other suffering my rise to the level of persecution").

[2] See also N.L.A. v. Holder, 744 F.3d 425, 431 (7th Cir. 2014) ("[C]redible threats of imminent death or grave physical harm can indeed be sufficient to amount to past persecution, provided they are credible, imminent and severe"); Lim v. I.N.S., 224 F.3d 929, 936 (9th Cir. 2000) ("[R]epeated and especially menacing death threats" may constitute past persecution, "particularly where those threats are combined with confrontation or other mistreatment.").

and placed Catherine in even greater danger by notifying Officer Abuser about her complaint, id. ¶ 19. Indeed, the year Catherine and her father reported Officer Abuser, the U.S. State Department noted that the Honduran police was corrupt, see Ex. I at 74, and that the government systematically failed to prosecute both perpetrators of gender-based crimes, id. at 84, and "police officials suspected of human rights violations," id. at 68.[3] Therefore, Catherine has demonstrated that the Honduran government was unwilling to protect her. See, e.g., Pan, 777 F.3d at 544-45 (finding the government unwilling to protect the applicant where, as here, he reported his attacker to the police without identifying him and felt that further reports would "get him into . . . trouble").

B. Catherine Suffered Past Persecution on Account of Her PSG Memberships

To succeed on a PSG claim, the applicant must establish that the PSG is "(1) composed of members who share a common immutable characteristic; (2) defined with particularity; and (3) social distinct within the society in question." Paloka v. Holder, 762 F.3d 191, 196 (2d Cir. 2014) (citing Matter of M-E-V-G-, 26 I. & N. 227, 237 (BIA 2014)). In addition, the applicant must show that the persecutor targeted her "'on account of' her membership in that group." Id. at 195 (internal citations omitted). "Whether the requisite nexus exists 'depends on the views and motives of the persecutor.'" Id. at 196-97 (quoting Matter of W-G-R-, 26 I. & N. 208, 223-24 (BIA 2014)). Here, Catherine suffered past persecution on account of her membership in the following PSGs:

1. *Honduran Women Who Are Unable to Leave an Intimate Relationship*

Members of this PSG share the immutable characteristics of "gender" and a relationship status that they are "unable to leave." Matter of A-R-C-G-, 26 I. & N. at 392-93.[4] The PSG

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[3] See also Ex. M at 152 ("During the 2012-2014 period, 4,992 [domestic violence] complaints were registered, with just 134 convictions"); Ex. R at 219 (in 2013, "violence against women and impunity for the perpetrators continue[d] in Honduras"); Ex. X at 287 (as of July 2014, "the lack of accountability for violations of human rights of women" in Honduras "is the norm rather than the exception").

[4] The presence of a legal marriage between the applicant and her abusive partner is not a distinguishing factor in the Matter of A-R-C-G- analysis. See, e.g., Matter of E-M-, slip op. at 1 (B.I.A. Feb. 18, 2015) [Ex. DD at 412].

satisfies the particularity requirement because it is limited by "commonly accepted definitions" that are specific to the "societal expectations" and "legal constraints" in Honduras, id. at 393, where domestic violence is "widespread," Ex. W at 269, and "impunity for perpetrators" is a "serious problem," id. at 268.[5] The PSG is socially distinct, because Honduran society makes "meaningful distinctions" based on the PSG's immutable characteristics and acknowledges the need to protect domestic violence victims. Matter of A-C-R-G-, 26 I. & N. at 394; see also Ex. W at 269. Despite this recognition, violence against women is "systematic" and a lack of accountability is "the norm." See Ex. M at 151.[6] Catherine suffered persecution in Honduras precisely because of her membership in this PSG. Every time she either discussed or tried ending her relationship with Officer Abuser, he held his gun to her head, raped her, hit her, pulled her hair, strangled her, and/or threatened to kill her or her children. See Ex. J at ¶¶ 3, 15-17, 22.

2. *Honduran Women Who Are Viewed as Property by Virtue of Their Positions in an Intimate Relationship*

This PSG fulfills the immutability, particularity, and social distinction requirements for many of the same reasons set forth above. See supra pages 5-6; see also DHS Brief, Matter of L-R- [Ex. BB at 349-50]. In particular, the evidence establishes the societal perceptions in Honduras that women occupy a subordinate status to men, see, e.g., Ex. Z at 307, and that the state will not protect women from domestic violence, see, e.g. id. at 306. In this case, Officer Abuser raped and abused Catherine because of his perception that she was his property and occupied a subordinate status in their relationship. When she resisted sexual relations with him, he told her that he was

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Indeed, the absence of a legal marriage between a victim and her abuser does not give the victim greater freedom to leave the relationship and, in fact, may minimize her ability to obtain protective orders and other interventions.

[5] See also Ex. W at 269 (U.S. State Department explaining how many Honduran women are "trapped in [a] situation of violence"); Ex. M at 157 (U.N. Special Rapporteur on Violence Against Women describing how the "lack of a responsive environment" in Honduras "results in many victims being compelled to stay in abusive relationships").

[6] See also Ex. M at 165 (explaining how the Honduran police "laugh or refuse to register complaints from women," as they did when Catherine tried reporting Officer Abuser); Ex. Z at 307 (noting that "domestic and sexual violence cases are handled with systematic indifference of the police" (internal quotations omitted)).

her "owner" and raped her. Ex. J ¶ 13. Similarly, when Catherine first tried breaking up with Officer Abuser, he told her that she "didn't know what [she] wanted" and only knew how to "clean and cook." Id. ¶ 15. He then put his gun to her head and raped her. Id. ¶ 16. Finally, when Catherine tried breaking up with Officer Abuser on April 17, 2013, he threatened to kill her, strangled her, and told her that if she "wasn't his, [she] wasn't anyone's." Id. ¶ 22.

3. *Honduran Women Who Are Unable to Leave an Intimate Relationship with a Honduran Police Officer*

This PSG fulfills the immutability, particularity, and social distinction requirements for the reasons set forth above. See supra pages 5-6; see also Matter of [Redacted], slip op. at 4 (B.I.A. Nov. 1, 2016) [Ex. EE at 418] (remanding to the Immigration Judge to consider the PSG "Salvadoran women unable to leave a domestic relationship with a close gang affiliate").[7] With respect to particularity, the social expectations and legal constraints in Honduras make it especially difficult for women to leave their intimate relationships with police officers. As Catherine's own experiences confirm, "[i]nvestigations into police abuses are marred by inefficiency and corruption" and "impunity is the rule." Ex. Y at 292. The PSG is socially distinct. Women in intimate relationships with police officers are easily recognizable, and Honduran society fruitlessly recognizes the needs to address police abuses, see Ex. W at 254-56; Ex. Y at 292, and to protect women from gender-based violence, see Ex. W at 269. Finally, Officer Abuser targeted Catherine because of her membership in this PSG. He repeatedly used his privileges and authority as a police officer to control Catherine and to prevent her from ending their relationship. See Ex. J ¶¶ 14, 16-17, 21-22. For example, he once took Catherine's son from school without her knowledge of consent. Id. ¶ 17. He then forced Catherine to cook for him to regain custody of the child. Id.

[7] Cf. CGRS Case #8793 (IJ, Aug. 22, 2011) (recognizing the PSG "immediate relatives of Salvadoran police officers involved in anti-gang efforts").

C. Catherine's Past Persecution Gives Rise to an Unrebuttable Presumption that She Has a Well-Founded Fear of Future Persecution

Where an applicant demonstrates past persecution on account of a protected ground, the presumption of future persecution is rebutted only if (1) "[t]here has been a fundamental change in circumstances" or (2) "[t]he applicant could avoid future persecution by relocating to another part" of her country. 8 C.F.R. § 208.13(b)(1). In this case, neither exception applies.

1. The Conditions in Honduras Have Not Changed, As Demonstrated by the Most Recent State Department Report and Other Secondary Sources

Though not dispositive, "State Department reports are usually the result of estimable expertise and earnestness of purpose, and they often provide a useful and informative overview of conditions in the applicant's home country." Tambadou v. Gonzales, 446 F.3d 298, 302 (2d Cir. 2006) (internal citations omitted). Here, the most recent State Department report confirms that domestic violence, police corruption, and police impunity continue to be common and serious problems in Honduras. See Ex. W at 246. As of 2015, a "majority of women in the country" were at "high risk" of experiencing "human rights violations, including violence." Id. at 270. Meanwhile, the government's failure to prosecute police officers for committing crimes "remained a serious problem." Id. at 247. At the time Catherine fled from Honduras, Officer Abuser continued to call her "multiple times per day" and look for her at her father's house. Ex. J ¶ 24. Thus, there has been no change in circumstances that would allay the strong possibility of her future abuse.

2. Catherine Cannot Avoid Persecution by Relocating Within Honduras

To determine whether it would be reasonable for an applicant to avoid persecution by relocating within her native country, an adjudicator must consider, inter alia, "social and cultural constraints, such as age, gender, health, and social and familial ties." 8 C.F.R. § 1208.13(b)(3).

Here, internal relocation is unreasonable, if not impossible. In Honduras, "gang-related violence and lawlessness" limit where women can safely travel. Ex. P at 185. Moreover, "there is a strong societal stigma attached to women living alone" and a lack of job opportunities for women like Catherine. Ex. AA at 325. There are few domestic violence shelters, see Ex. W at 269, and they do not "operate effectively" due to a lack of government funding, id.[8] As a result, women like Catherine "have no place to go other than to the homes of family members, friends, or neighbors – places where they often face continued threats and violence from their abusers." Ex. Z at 308.

Even if Catherine overcame these barriers, she would nonetheless remain at risk of persecution as a result of her abuser's government connections. As a member of the Honduran police, Officer Abuser "has access to a lot of information" and could "track [Catherine] down" no matter where she goes. Ex. J ¶ 30. Although Catherine briefly escaped from Officer Abuser by hiding in her aunt's house, Ex. J ¶ 25, living in hiding does not constitute safe relocation, Mei Ya You v. Mukasey, 07-3879-ag NAC, 274 Fed. App'x 50, 52 (2d Cir. Apr. 22, 2008).[9] Thus, it would be unreasonable to expect Catherine to internally relocate, and the presumption of a well-founded fear of persecution applies. See, e.g., DHS Brief, Matter of R-A- [Ex. CC at 409] (DHS arguing that relocation was unreasonable where the applicant's abuser served in the military).

D. Independent of Any Presumptions, Catherine Has a Well-Founded Fear of Future Persecution in Honduras Because She Ended Her Relationship with Officer Abuser

To demonstrate a well-founded fear of future persecution, an applicant must show "a subjective fear that is objectively reasonable." Kone v. Holder, 596 F.3d 141, 146 (2d Cir. 2010)

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[8] Even if Catherine could safely travel to and locate a shelter, she could not stay there. To qualify for shelter, a woman must "[h]ave no social network or emergency support that would enable [here] to temporarily leave their situation of extreme violence." Ex. R at 223. In this case, however, Catherine's father continues to live in Honduras. See Ex. K ¶ 1. In any event, Catherine could only stay in the shelter for "three months." Ex. R at 223.

[9] Accord N.L.A. v. Holder, 744 F.3d 425, 435-36 (7th Cir. 2014); Essohou v. Gonzalez, 471 F.3d 518, 522 (4th Cir. 2006);Mece v. Gonzales, 415 F.3d 562, 578 (6th Cir. 2005).

(internal quotations omitted). "The subjective component may be satisfied by the applicant's credible testimony that she fears persecution." Abankwah v. INS, 185 F.3d 18, 22 (2d Cir. 1999). To satisfy the objective prong, the applicant must demonstrate that "a reasonable person in her position would fear persecution if returned to her native country." Id. Notably, a showing of a ten percent likelihood of persecution suffices to establish that an applicant's fear is well-founded. Paloka, 762 F.3d at 198 n.3 (citing INS v. Cardoza-Fonseca, 480 U.S. 421, 431, 440 (1987)).

Catherine satisfies these thresholds. While she was still living in Honduras, Officer Abuser regularly threatened to kill her or her children if she ever tried ending her relationship with him. Ex. J ¶¶ 16-17, 22. In 2013, Catherine defied Officer Abuser by fleeing Honduras. Id. ¶ 28. She now fears that Officer Abuser will force her back into an abusive relationship or kill her in retribution. Id. ¶¶ 28-30. This fear is entirely reasonable: violence against women is pervasive in Honduras, see Ex. W at 268-69, and femicides have "increased alarmingly" in recent years, see Ex. M at 152. Through Catherine's own experiences, the Honduran government has proved itself unwilling to control these crimes. See Ex. J ¶¶ 18-19; Ex. K ¶¶ 14-18; see also Ex. S at 228 (96% of domestic abuse complaints are never resolved). Catherine is at risk of this persecution on account of her membership in the PSGs described above. See supra pages 5-7. Thus, she has shown a well-founded fear of persecution independent of any presumptions.

E. Even Absent a Well-Founded Fear of Persecution, Catherine Is Entitled to Humanitarian Asylum

Humanitarian asylum may be granted as a matter of discretion where the applicant's past persecution was particularly severe. 8 C.F.R. § 1208.13(b)(1)(iii)(A). To qualify for this relief, the applicant must "establish both the severe harm and the long-lasting effects of that harm." Kone, 596 F.3d at 152 (internal citations omitted). Humanitarian asylum is also available where the applicant would face a reasonable possibility of "other serious harm" if forced to return to her

native country. 8 C.F.R. § 1208.13(b)(1)(iii)(B). As relevant here, "other serious harm" may encompass a lack of appropriate housing in the country of removal. See, e.g., Kholyavskiy v. Mukasey, 540 F.3d 555, 577 (7th Cir. 2008) ("Debilitation and homelessness both would appear to constitute serious harms for purposes of 8 C.F.R. § 1208.13(b)(1)(iii)(B).").[10]

In this case, Catherine's past persecution was so atrocious that she suffers the long-lasting effects of that harm and is therefore eligible for humanitarian asylum under 8 C.F.R. § 1208.13(b)(1)(iii)(A). Officer Abuser repeatedly beat her, raped her at gunpoint, threatened to kill her and her children, and once hit and strangled her to the point that she had to be hospitalized. See Ex. J ¶¶ 2-3, 12-17, 20-23. Unsurprisingly, Catherine remains severely traumatized by this abuse: she suffers from Post-Traumatic Stress Disorder and Major Depression. Ex. V ¶¶ 12, 14-15. Catherine also qualifies for humanitarian asylum under 8 C.F.R. § 1208.13(b)(1)(iii)(B) because she faces a reasonable possibility of other serious harm upon her return. As the most recent State Department report confirms, there are very few domestic violence shelters in Honduras, see Ex. W at 269, and Catherine would not qualify to stay at one, see supra page 9 n.8. Thus, if she returned to Honduras, she would have no safe place to reside and effectively would be homeless. For the foregoing reasons, Catherine qualifies for humanitarian asylum.

F. The Court Should Grant Catherine Asylum as a Matter of Discretion

Where, as here, an applicant demonstrates her eligibility for asylum, she bears the burden of demonstrating that a favorable exercise of discretion is warranted. Huang v. INS, 436 F.3d 89, 97 (2d Cir. 2006). Catherine easily satisfies this burden. The persecution she suffered and fears is severe, no bars to asylum apply, and no other adverse factors exist. On the contrary, Catherine is the mother of two U.S. citizen children, does not have a criminal record, and hopes

[10] See also Pllumi v. Att'y Gen. of the U.S., 642 F.3d 155, 162-63 (3d Cir. 2011).

to someday become a grade school teacher. Ex. J ¶ 31. She is applying for asylum in the United States so that she can remain united with her children and continue rebuilding her life. Id.

CONCLUSION

For the foregoing reasons, Catherine respectfully requests that the Court grant her application for asylum.

Dated: December 16, 20--
New York, New York

SANCTUARY FOR FAMILIES

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Memorandum of Law in Support of Respondent's Application for Asylum, Withholding of Removal and Protection Under the Convention Against Torture by hand upon the Executive Office of Immigration Review and the Office of Chief Counsel of the U.S. Department of Homeland Security, respectively, at the following addresses:

Immigration Judge Terry A. Bain
Executive Office for Immigration Review
26 Federal Plaza, 12th Fl., Room 1237
New York, NY 10278

---and---

Office of the Chief Counsel
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Dated: December 16, 20--
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