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

In the Matter of:	)	File No.: A 000-000-000
Application of Catherine CLIENT for Asylum and Withholding of Removal	)	
In Removal Proceedings	)	

AFFIDAVIT OF CATHERINE CLIENT

I, CATHERINE CLIENT, being duly sworn, depose and say:

Introduction

1. My name is Catherine Client, and I was born on January 1, 19XX in a small village on the outskirts of Honduran City, Honduras. I currently live in New York, New York with my two U.S. citizen children: Chris Child, who is X years old, and Elizabeth Child, who is X years old. I submit this affidavit in support of my application for asylum and withholding of removal in the United States.

2. While living in Honduras, I was in an abusive relationship with a police officer named Barry Boyfriend. Barry Boyfriend regularly hit me, raped me at gunpoint, threatened to kill my children and me, and told me that I was his servant and he was my owner. In about March 2013, I went to the police headquarters in Honduran City and asked for help. A police officer told me that I had to pay him a bribe of 300 Honduran lempiras to start an investigation. I didn't have that much money, so I couldn't file a report.

3. In about April 2013, I tried to break up with Barry Boyfriend, and, in response, he strangled me and beat me so severely that I had to go to the hospital. After my release, I hid in an aunt's house in the capital of Honduras and then fled to the United States. If I am forced to return to Honduras now, I am afraid that Barry Boyfriend will kill me, as he often threatened to do. I am also afraid that the police won't protect me.

My Early Life in Honduras and My First Trip to the United States

4. I grew up in a small village in Honduras named Honduran Village. My mother was a homemaker, and my father was a farmer. In addition to farming, my father also owned a small grocery store that was attached to our home. He sold basic foods for the people in my village. My mother, sisters, and I also prepared and sold meals there on

the weekends. After I completed ninth grade, I stopped going to school. I took sewing classes and worked at my dad's store.

5. In October 20XX, when I was 20 years old, I moved to the United States by crossing the U.S./Mexican border without inspection. The reason I moved to the United States was because I wanted to work and help my family by sending money back home. I also wanted to learn English and complete my education. Over the following years, I took English classes at a local library, and worked at a tortilla factory. I gave birth to my son, Chris Child, in 20XX, and to my daughter, Elizabeth Child, in 20XX.

6. Around 20XX, my mother became severely ill. I decided to return to Honduras to care for her and to help my dad at the store. My children and I flew back to Honduras in March 20XX, and I took care of my mother until she passed away four months later, in July 20XX. Thereafter, I decided to stay in Honduras to support my dad and to continue helping him at the store.

7. I missed my mom, but I was happy in Honduras. Every morning, I worked at the store while my dad milked the cows and did other work in the fields. My dad came in from the fields in the early afternoon, and we'd eat lunch as a family. Then, my dad would take over at the store, and I'd spend the afternoon with my children. My life was simple but fulfilling.

<u>My Relationship with Barry Boyfriend</u>

8. One weekend in about December 20XX, I met Barry Boyfriend while he was patrolling my village. I was serving food at my dad's store, and Barry Boyfriend came in for a soft drink and lunch. He was wearing a uniform – I believe it was camouflage green – and he carried a small gun on his belt and a larger gun on his shoulder. He looked like a typical "*chafarote*," which is what we call police officers in Honduras.

9. Barry Boyfriend chatted with me while I was waiting on him. He asked me what my name was, whether I had any children, and whether I was in a relationship with anyone. He told me that he lived in the city and patrolled Honduran Village and the other villages on the outskirts of Honduran City. I could tell that Barry Boyfriend liked me. He asked me if he could call me some day, and I said that he could. I gave him my phone number.

10. Over the next months, Barry Boyfriend called me on the phone and came back to the store more and more frequently. He also went to my house and asked my dad's permission to get to know me better. I wasn't home at the time, but I talked to my dad afterwards. He told me that he didn't trust Barry Boyfriend and didn't think it was a good idea for me to get involved with a police officer. I told my dad that Barry Boyfriend seemed responsible and serious, and that I wanted to give him an opportunity.

11. At some point, Barry Boyfriend started coming over to my house while my dad was in the fields. I'd make a hot meal for him, and he'd watch TV. There were also days when he'd invite me to his apartment in the city. I'd cook for him, we'd eat together, and then I'd clean his apartment. I tried to keep the relationship a secret from my dad, because I knew that he didn't approve of Barry Boyfriend because he was a police officer.

Barry Boyfriend's Physical and Sexual Abuse of Me

12. Starting in about February 20XX, Barry Boyfriend began to physically and sexually abuse me. By this time, I had learned that Barry Boyfriend was very different than I thought, and that he abused alcohol and drugs.

13. The first time Barry Boyfriend hurt me was when I told him that I didn't want to have sex with him. In response, he grabbed me by the arms, pulled me to his bedroom, and took my clothes off of me by force. I became scared and tried calming Barry Boyfriend. I told him that I would have sex with him, but that we had to do things right, and he couldn't just do whatever he wanted with me. In response, Barry Boyfriend pushed me on the bed and told me that he was my owner, and that I would always be his. Then he lay on top of me and raped me. After he finished, I bathed and tried calming myself down. I felt ashamed about what happened, and I didn't want my dad to find out.

14. From that point on, Barry Boyfriend regularly forced me to have sex with him and to drink alcohol and smoke marijuana. I was usually too afraid to defend myself. However, on a few occasions – like when Barry Boyfriend wanted to have anal sex with me – I tried fighting back. In response, Barry Boyfriend threw furniture, hit me, and pulled my hair. He also threatened to kill my children.

15. In about March 20XX, I tried breaking up with Barry Boyfriend at his apartment. I told him that I didn't want to be in this type of relationship anymore. He immediately got mad and started insulting me. He told me that I didn't know what I wanted, and that the only thing I knew how to do was clean and cook. He said I was a "*zorra*" ("whore"), just like all the others, and that he knew I was a whore the first time he met me. He said that was the only reason he ever wanted to be with me.

16. I calmly told Barry Boyfriend that I wasn't a whore, and that he met me at my father's store. He called me a bitch and told me I knew nothing. Then he put his pistol to my head. He told me that he wanted it to be clear that he was my owner, and that the relationship would end only when he wanted it to. He also told me that I was his servant, and that he could have me whenever he wanted. Then he put down his gun and raped me. When he was done, he went to work. I took a shower and tried to calm down before going back home.

17. I tried breaking up with Barry Boyfriend two or three times. Each time, he held his gun to my head and raped me. He also threatened to kill my children if I ever ended my relationship with him. On one occasion, I went to pick my son up at school

and panicked when I couldn't find him. His teacher told me that Barry Boyfriend had already picked him up. I called Barry Boyfriend, and he said that I had to go to his apartment and cook a meal for him if I wanted to see my son. I felt powerless and did as he said.

The Police's Refusal to Help Me

18. Sometime after Barry Boyfriend held his gun to my head for the first time in March 2013, I went to the police headquarters in Honduran City. When I walked in the headquarters, one police officer was sitting at a table, and two or three other officers were standing nearby. I told the officer seated at the table that I wanted to make a report against someone who was threatening me with a gun. I didn't give Barry Boyfriend's name or say that he was a police officer, because I thought the police officer might be his friend. The police officer seated at the table told me that I would have to pay him a bribe of 300 Honduran lempiras to start an investigation. I didn't have 300 lempiras – it was a lot of money for someone like me – so I left and went home.

19. About two weeks later, Barry Boyfriend told me that he had heard that a woman went to the police headquarters and complained that someone was threatening her. He told me that he hoped it wasn't me. I felt terrified but tried to stay calm. I asked Barry Boyfriend why I would want to report him and lied and said that I didn't make the complaint. He said, "*mas te vale*" ("you better not have"). I thanked God that I didn't give the police officer my name or Barry Boyfriend's.

Barry Boyfriend's Sexual and Physical Abuse of Me in April 2013

20. One day in about April 20XX, Barry Boyfriend put his gun to my head, raped me, choked me, and beat me so badly that I had to go to the hospital. The problems started that day when Barry Boyfriend arrived home from work and saw that there wasn't any cold beer in the refrigerator. He blew up and started yelling at me, calling me ugly names, and throwing things around the house. He called me an "*hija de puta*" (son of a bitch) and told me that I was unappreciative. I had already prepared dinner for Barry Boyfriend, but he took the plate full of food and threw it against the wall.

21. I tried calming Barry Boyfriend, but this upset him even more. He got his gun, pressed it to my head, and told me that he was going to kill me. Then he put down his gun and raped me. He ripped off my clothes, lay on top of me, held my hands above my head with one hand, and choked me with the other. After he finished, I sat on the bed and cried. Barry Boyfriend told me to shut up and to go into the bathroom if I needed to cry. I went into the bathroom, continued crying, and bathed.

22. I couldn't take it anymore. When I came out of the bathroom, I told Barry Boyfriend that that was the last time he'd ever do that to me. Without saying anything, he grabbed me by the neck and hair. I scratched his face and arms to get away, but he grabbed his gun and hit me with it in the head and face. He threw me to the ground, got on top of me, and kept hitting my head and face. I pleaded with him to stop hitting me,

but he didn't. He told me to shut up and started choking me. I thought Barry Boyfriend was going to kill me. I asked him to think of my children and told him that I loved him. I also asked why he was doing this to me. He told me that I was trying to end our relationship, and that if I wasn't his, I wasn't anyone's.

23. At some point, Barry Boyfriend stopped choking and hitting me and told me that he was going to take me home. I asked him to wait, because I didn't want my dad to see me all beaten up. Barry Boyfriend told me that he didn't care what I wanted. He brought me home and left me on a bench outside the front door of my dad's house. At some point, my dad found me, saw the condition I was in, and took me to a hospital. I stayed at the hospital overnight and was released the next day.

My Flight to the United States

24. Following my release from the hospital, Barry Boyfriend called me multiple times per day. I was scared and didn't answer his calls. He also came to my father's house and knocked loudly on the door. Each time, I went into my dad's bedroom and hid underneath the bed.

25. I was afraid that Barry Boyfriend would hurt or even kill me, and my dad told me that he was afraid too. In around June 20XX, my dad took me to the capital city, Tegucigalpa, where I stayed with my aunt. He also bought a new chip for my cell phone, so that Barry Boyfriend couldn't call me. I stayed in Tegucigalpa for about two months. During that time, I was afraid that Barry Boyfriend would find me, so I stayed in the house and only went outside once per week to help my aunt carry groceries home from the market. I felt scared when I left the house and looked all around me to make sure that Barry Boyfriend wasn't there.

26. Because Barry Boyfriend is a police officer, I worried that it was only a matter of time before he would track me down in Tegucigalpa. While I was staying with my aunt, my dad made arrangements for me to travel to the United States, where we thought I would be safer. He paid a smuggler $6,000 to help me travel through Guatemala and Mexico and to cross the U.S./Mexican border. He also bought plane tickets for my children to fly to New York, where my sister lived. My children flew to the United States in early August 20XX. Approximately two weeks later, I entered the United States by crossing the U.S./Mexican border without inspection.

27. After I entered the United States, immigration officials caught me. I had an interview with an asylum officer and stated during the interview that I was afraid to return to Honduras because I feared that Barry Boyfriend would kill me. I told the asylum officer that Barry Boyfriend threatened me with a gun, sexually abused me, and physically abused me. I also told the asylum officer that I had gone to the police but couldn't pay the 300 Honduran lempiras they demanded to start an investigation.

Why I Am Applying for Asylum in the United States

28. I am still afraid to return to Honduras. I disobeyed Barry Boyfriend by ending my relationship with him and fleeing to the United States. If I am forced to return to Honduras now, I fear that Barry Boyfriend will find me, force me into a relationship with him, abuse me, or even kill me.

29. If I am forced to return to Honduras, I couldn't report Barry Boyfriend to the police, because he would probably find out – just as he did before – and hurt me. Even if I did report him to the police, I know that they would do nothing to protect me. Because Barry Boyfriend is a police officer, he will never be punished or arrested.

30. I will not be safe anywhere in Honduras. As a police officer, Barry Boyfriend has access to a lot of information, and he will track me down no matter where I go. If I am forced to return to Honduras, I will have to stay in hiding – like I did in Tegucigalpa – and never leave the house. Even then, I would still be afraid that Barry Boyfriend would find me. I am not aware of shelters or any other safe places in Honduras for people in my situation to go.

31. I hope to remain in the United States with my two children, who are U.S. citizens. I feel safe in this country. I want to learn English and continue providing for my kids. I love children, and my dream is to someday become a grade school teacher. I am applying for asylum in the United States so that I can achieve these goals and continue rebuilding my life.

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Wherefore, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

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Catherine Client

Sworn to me this __ day of
October 20XX in New York, NY

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Notary Public

Certificate of Translation

1. My name is Andrea Attorney. I am an employee of Amazing Law Firm, a law firm with a mailing address of 123 Pro Bono Street, New York, NY 11111.

2. I certify that I am competent to translate English into Spanish, and that I have read and translated this Affidavit to Catherine Client.

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Andrea Attorney

Sworn to me this __ day of
October 20XX in New York, NY

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Notary Public