January __, 2018

U.S. Citizenship & Immigration Services
New York Asylum Office
1065 Stewart Avenue, #200
Bethpage, New York 11714

RE: Catherine Client (A# 209-291-447)
MEMORANDUM IN SUPPORT OF ASYLUM APPLICATION

Catherine Client (hereinafter "Catherine") is eligible for and deserving of a grant of asylum because she suffered past persecution and fears future persecution in Honduras on account of her membership in the particular social groups of: (1) Honduran children who are perceived of as property by virtue of their position in the family;[1] (2) Honduran girls and young women without effective familial protection;[2] (3) Children of Joe Father.[3] Catherine is also deserving of asylum because of her political opinion that Honduran children have human rights[4] and deserve effective protection from abusive parents during their childhood.

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[1] Alternatively, Honduran female children who are perceived of as property by virtue of their position in the family.

[2] Alternatively, Honduran girls women without effective familial protection.

[3] Alternatively, immediate family members of Joe Father.

[4] Children's rights are human rights of those under the age of 18 years old and encompass the rights to an adequate standard of living, health care, education and services, and to play and recreation, as well as the right to protection from abuse, neglect, exploitation and discrimination. These basic rights of children have been delineated in the United Nations Convention on the Rights of the Child. *See* UN General Assembly, *Convention on the Rights of the Child*, 20 November 1989, United Nations, Treaty Series, vol. 1577, p. 3, available at: http://www.refworld.org/docid/3ae6b38f0.html.

Catherine has suffered significant trauma throughout her life. During her childhood, Catherine witnessed her father, Joe Father, beat her mother, Maria Mother and her sisters. Catherine's father also beat Catherine herself; however, her mother did what she could to protect Catherine and her other daughters from his abuse. After Catherine's mother left for the United States with both Catherine's youngest and oldest sisters in 2014, Catherine was left in Honduras with her two younger sisters, Sally and Clara, in the home of their abusive father. To that point in her life, Catherine's father had hit her; however, he had directed much of his abuse towards her mother. Subsequent to their mother's departure from the household and without effective familial protection, Catherine, Sally, and Clara suffered abuse regularly at the hands of their father. Catherine's father regularly hit Catherine and her sisters with *mecates* (reins for horses), *barras* (branches cut from trees), and *fajas* (belts).[5] Catherine regularly suffered bruises and swelling from her father's beatings and on at least two occasions, Catherine bled and suffered open wounds from his abuse of which she still has scars.[6] The Honduran government failed to protect Catherine or her siblings from harm throughout their childhood.

Additionally, Mr. Father was a target himself for persecution by others in Honduras. After his persecutors killed his brother, they identified Catherine, Sally, and Clara as targets for retribution because they are Mr. Father's children.[7]

Circumstances have not changed in Honduras and there is no reasonable expectation Catherine would be safe in Honduras, as she would continue to live without effective familial protection. Catherine would have no safe place to live and would face continued physical and verbal abuse at the hands of her father. Furthermore, she would continue to be a target of her

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[5] *See* Affidavit of Catherine Client, attached as Exhibit A at ¶ 8.
[6] *See* id., at ¶ 9.
[7] *See* id., at ¶ 14.

father's persecutors. For these reasons, she respectfully requests that the United States grant her asylum.

I. Summary of the Facts

Catherine is a 14 year old native and citizen of Honduras.[8] Catherine was raised by her mother, Maria Mother, and her father, Joe Father. Catherine is the second oldest of five children, all of whom are girls.[9] Mr. Father beat and abused Catherine in front of Catherine's other siblings and Ms. Mother. Ms. Mother intervened repeatedly, however, in response, Mr. Father would turn his abuse on Ms. Mother.[10] When Catherine was roughly 12 years old, Ms. Mother left the home for the United States with Catherine's oldest and youngest sisters. Catherine and her other two sisters were left behind in Honduras with Mr. Father.

After Ms. Mother left for the United States, Catherine and her sisters suffered more frequent and severe abuse at the hands of their father.[11] Mr. Father ordered Catherine and her sisters around the house as if they were his servants and abused them at will.[12] On at least two occasions Mr. Father hit Catherine so severely that he drew blood and left scars on her body.[13] Catherine often came to the defense of her sisters when her father would attempt to beat them and this frequently caused her father to beat her even more severely.[14] On one occasion, when Catherine stood up to her father, he responded by throwing her to the floor and pinning her throat to the floor with his foot.[15]

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[8] *See* Birth Certificate of Catherine Client, attached as Exhibit B.
[9] *See* Exhibit A at ¶ 1.
[10] *See* id., at ¶ 5-6.
[11] *See* id., at ¶ 7-12.
[12] *See* Id.
[13] *See* id., at ¶ 9.
[14] *See* id., at ¶ 10.
[15] *See* id., at ¶ 10.

In July 2016, Catherine's uncle, John Uncle, was killed.[16] The same men had targeted and tried to kill Mr. Father and also began looking for Catherine and her sisters. Fearful of continued abuse at the hands of her father and fearful for her life and safety by her uncle's and father's persecutors, Catherine fled Honduras with her sisters. In early August 2016, at the age of 13 years old, Catherine entered the United States as an unaccompanied alien child.[17] Catherine later applied for asylum after reuniting with her mother.

II. Applicable Law

Under Section 208(b)(1) of the Immigration and Nationality Act ("INA"), the Attorney General is authorized to grant asylum to any refugee who is unable or unwilling to return to her 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."[18]

To establish eligibility for asylum on the basis of past persecution, an applicant must show: an incident or incidents that rise to the level of persecution; perpetrated on account of one of the statutorily protected grounds (race, religion, nationality, membership in a particular social group, or political opinion); and committed by the government or forces the government is either unable or unwilling to control.[19] All harm must be considered cumulatively to determine whether it constitutes persecution. At least "one central reason" for the persecution must be one of the protected grounds.[20] An applicant who has established past persecution on account of one of the protected grounds is entitled to a presumption that she has a well-founded fear of

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[16] *See* id., at ¶ 13.
[17] *See* id., at ¶ 2.
[18] 8 U.S.C. § 1101(a)(42)(A).
[19] *See Gao v. Ashcroft*, 299 F.3d 266, 271–72 (3d Cir. 2002) (citing *Navas v. INS*, 217 F.3d 646, 655–56 (9th Cir. 2000)), *superseded by statute on other grounds*, 8 U.S.C. § 1158(b)(1)(B)(iii).
[20] INA § 208(b)(1)(B)(i); *Matter of J-B-N- & S-M-*, 24 I&N Dec. 208, 211(BIA 2007).

persecution on the same basis.[21] If the applicant can show past persecution on account of one of the five enumerated grounds, there is a rebuttable presumption of a well-founded fear of future persecution.[22] Moreover, where past persecution is particularly severe, asylum can be granted on humanitarian grounds.[23]

Persecution "encompasses a variety of forms of adverse treatment, including non-life threatening violence and physical abuse, or non-physical forms of harm such as the deliberate imposition of a substantial economic disadvantage."[24] Persecution may include psychological or emotional harm.[25] Given that repeated physical and emotional abuse is traumatic and has persistent impacts on a child,[26] child abuse is persecution of an "atrocious" nature.[27]

A "particular social group" consists of people who share "common characteristics that members of the group cannot change, or should not be required to change because such characteristics are fundamental to their individual identities."[28] The Board of Immigration Appeals has clarified that the particular social group need also be "socially distinct" and particularly defined.[29]

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[21] 8 CFR § 208.13(b)(1).

[22] *See* 8 C.F.R. § 208.13(b)(1) (2012); *Matter of Chen*, 20 I&N Dec. 16, 18 (BIA 1989).

[23] *See* 8 C.F.R. § 208.13(b)(1)(iii); *Matter of Chen*, 20 I&N Dec. at 19.

[24] *Ivanishvili v. U.S. Dep't of Justice*, 433 F.3d 332, 342 (2d Cir. 2006).

[25] *See Ouk v. Gonzales*, 464 F.3d 108, 111 (1st Cir. 2006); *Mashiri v. Ashcroft*, 383 F.3d 1112, 1120 (9th Cir. 2004).

[26] *See* Penelope K. Trickett & Catherine McBride-Change, *The Developmental Impact of Different Forms of Child Abuse and Neglect*, 15 Developmental Rev. 311 (1995); Robert F. Anda et. al., *The Enduring Effects of Abuse and Related Adverse Experience in Childhood*, 256 Eur. Archives of Psychiatry & Clinical Neuroscience 174 (2006) ("Childhood maltreatment has been linked to a variety of changes in brain structure and function and stress-responsive neurobiological systems."); Joan McCord, *A Forty Year Perspective on Effects of Child Abuse and Neglect*, 7 Child Abuse and Neglect 266 (1983).

[27] *See Matter of S-A-K- & H-A-H-*, 24 I&N Dec. 464, 465-66.

[28] *Matter of Acosta*, 19 I. & N. Dec. 211, 233 (BIA 1985).

[29] *See Matter of M-E-V-G-*, 26 I. & N. Dec. 227 (BIA 2014) and *Matter of W-G-R-*, 26 I. & N. Dec. 208 (BIA 2014); *but see Cece v. Holder*, 733 F.3d 662 (7th Cir. 2013); *Valdiviezo-Galdamez v. Att'y Gen.*, 663 F.3d 582, 608 (3d Cir. 2011).

III. Legal Analysis: Catherine's Eligibility for Asylum

A. Assessing Catherine's asylum claim as an unaccompanied alien child

United States and international law consider children's asylum claims distinctly from adult asylum claims, given the uniquely vulnerable status of children in society and their developmentally distinct nature.[30] A child's asylum claim cannot be analyzed as an adult's, and must be considered from that specific child's perspective, which may not be as cognitively or emotionally sophisticated as a typical adult.[31]

With Catherine, her asylum claim must be considered from a child-specific perspective, as she was a child throughout the abuse she suffered in her native Honduras, upon her entry into the United States, and when she filed for asylum. The trauma Catherine suffered at the hands of her father and the threat posed by her uncle's and father's persecutors as well as her fear of being forced to return to Honduras, must be considered from her perspective as a child.

B. Catherine Suffered Past Persecution

Catherine's father frequently beat her throughout her childhood, causing her bruises and bleeding.[32] Catherine and her sisters were forced to do virtually all of the household's chores,

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[30] *See* Guidelines for Children's Asylum Claims, U.S. Department of Justice, Immigration and Naturalization Service, Office of International Affairs, File 120/11.26, December 1, 1998 ["U.S. Guidelines"]; *Guidelines on International Protection: Child Asylum Claims under Articles 1(A)2 and 1(F) of the 1951 Convention and/or 1967 Protocol relating to the Status of Refugees*, United Nations High Commissioner for Refugees, HCR/GIP/09/08, December 22, 2009 ["UNHCR 2009 Guidelines"]; Guidelines and Procedures in Dealing with Unaccompanied Children Seeking Asylum, Office of United Nations High Commissioner for Refugees Geneva, February 1, 1997 ["UNHCR 1997 Guidelines"]; Field Handbook for the Implementation of UNHCR BID Guidelines, United Nations High Commissioner for Refugees, November 2011; International Committee of the Red Cross, *Inter-agency Guiding Principles on Unaccompanied and Separated Children*, 2004, available at http://www.unicef.org/protection/IAG_UASCs.pdf.

[31] *See* United Nations Committee on the Rights of the Child, General Comment. No. 6 (2005): *Treatment of Unaccompanied and Separated Children Outside Their Country of Origin*, CRC/GC/2005/6 Sept. 2005 (noting that the refugee definition "must be interpreted in an age and gender sensitive manner, taking into account the particular motives for, and forms and manifestations of, persecution experienced by children."); *see also Kholyavskiy v. Mukasey*, 540 F.3d 555 (7th Cir. 2008); *Jorge-Tzoc v. Gonzales*, 435 F.3d 146 (2nd Cir. 2006); *Hernandez-Ortiz v. Gonzales*, 496 F.3d 1042 (9th Cir. 2007); *Zhang v. Gonzales*, 408 F.3d 1239(9th Cir. 2005).

[32] *See* Exhibit A at ¶ 8.

and when these chores were not done to their father's liking, he often would beat them.[33] Catherine's father treated her as his property by hitting her at will and ordering her to do as he pleased. He also denigrated her, verbally abused her, and made her feel like an unwanted child referring to her as *serote* (piece of shit) and *mierda* (shit).'[34] While Ms. Mother intervened to defend Catherine and her sisters from her father's beatings, Catherine's mother was regularly subjected to abuse herself, and Mr. Father would retaliate against her when she did intervene. While Ms. Mother attempted to shield Catherine and her other daughters from abuse, this protection was only so effective. When Catherine was 12 years old, Ms. Mother left for the United States. Subsequent to their mother's departure from the household, and without any familial protection whatsoever, Catherine's father abused her and her sisters more frequently and more severely.[35]

The last memory Catherine has of her father is when a man arrived to their home notifying her father that her uncle had been killed.[36] Catherine's father left the home and his daughters. Shortly after, Catherine heard that the men that had killed her uncle were looking for "the daughters of *Joe* (Mr. Father)."[37] Terrified and knowing that she was unsafe, Catherine and her sisters sought temporary shelter at the home of a local pastor.[38] From there, Catherine and her sisters fled Honduras for the United States with the help of their mother's friend. Catherine had no effective familial protection from her father during his constant abuse of her and her

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[33] *See* id., at ¶ 12.
[34] *See* id., at ¶ 11.
[35] *See* id., at ¶ 7-12.
[36] *See* id., at ¶ 13.
[37] *See* id., at ¶ 13.
[38] *See* id., at ¶¶ 14.

family, but also no familial protection from the men that sought to harm her because she was her father's daughter.

Suffering child abuse to the point she feared death at the hands of her father, witnessing the abuse of her mother by her father, witnessing the abuse of her sisters by her father, and the fear of death at the hands of her uncle's and father's persecutors together, cumulatively, these rise to the level of persecution, especially in light of Catherine's age and the stage of development at the time she suffered these harms.

C. One Central Reason Catherine Was Persecuted Was Her Membership in the Particular Social Group Comprised of Honduran Children Perceived of as Property by Virtue of their Position Within the Family

One central reason for Catherine's persecution was her membership in the particular social group comprised of Honduran children perceived of as property by virtue of their position within the family. Catherine's situation is analogous to the domestic violence victim in *Matter of L-R-*, in which the Department of Homeland Security determined that "Mexican women who are viewed as property by virtue of their positions within a domestic relationship" met the requirements to establish asylum and, in particular, a qualifying particular social group. *See* Supplemental Brief of Department of Homeland Security, *In re L.R.* (B.I.A. Apr. 13, 2009) at 14. In that case, DHS critically noted "how the [victim's] abuser and her society perceive her role within the domestic relationship"[39] and that due to "economic, social, physical or other constraints," it was impossible for a victim to relieve herself of her subordinate status in the relationship.[40]

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[39] As the DHS noted in its brief in *Matter of R-A-*, "[e]vidence that the abuser uses violence to enforce power and control over the applicant because of the social status that the applicant has within the family relationship is highly relevant to determining the persecutor's motive." *See* Department of Homeland Security's Position on Respondent's Eligibility for Relief, *In re Alvarado-Pena* (U.S. Dep't of Justice Feb. 19, 2004) at 35.

[40] Id. at 16.

Catherine is a Honduran child perceived of as property by her father by virtue of her position within her family. Catherine had no choice as to her family or in being repeatedly abused by her father. Catherine's father believes in Catherine's subordinate status and his perception is reinforced by Honduran societal norms. As one expert notes, "It is my opinion that in Honduras, children are not treated as people with rights but as the property of their parents, and, by extension, the broader community of adults in general."[41]

The persecutor in Catherine's case was her father. He regularly ordered her to do his bidding, abused her at will, and targeted her for this precisely because she is *his* daughter and thus understood to be *his* property. Catherine's father did not abuse just anyone, he abused and threatened Catherine, his other daughters, and his wife. He targeted their vulnerability as his immediate family members because he considered them *his* property.[42]

Honduran children in Catherine's situation are socially distinct and particular. Honduran children are under the age of legal majority, and are perceived of as distinct because of their nationality, age, dependency on others, and lack of full legal rights. Disturbingly, child abuse and domestic violence is common in Honduras,[43] and Honduran children are often subject to physical, emotional, and sexual abuse.[44] Child abuse is rarely reported and, despite statutory rights,[45] the predominant cultural belief is that "children are not treated as people with rights but as the property of their parents."[46]

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[41] *See* Declaration of Dr. Ubaldo Herrera Coello, Exhibit D at ¶ 2.

[42] *See* Exhibit A at ¶¶ 5-12; *see also* Declaration of Claudia Herrmannsdorfer, Exhibit E at ¶ 25.

[43] *See* United States Department of State, Bureau of Democracy, Human Rights and Labor, Country Reports on Human Rights Practices for 2015: Honduras, available at: http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm?year=2015&dlid=253023, attached as Exhibit C.

[44] *See* Exhibit D at ¶¶ 2, 11- 12.

[45] *See* id., at ¶¶45-47, 55-58, 62, 65, 70 (for a review of the Honduran government's failure to protect children from child abuse and other violence).

[46] *See* id., at ¶ 2.

Further, female children in the societal patriarchal structure in Honduras are especially vulnerable leading to a high incidence of abuse at home, at school and in society.[47]

> As one expert notes, "Female children face double discrimination due to their status as children and their gender. They tend to be subjected to higher rates of the abuses mentioned above, especially sexual violence, due to gender norms and a pervasive culture of machismo and sexism throughout the country. Since the time of colonization, men have held greater power in society and have occupied a higher status than women. Women, like children, are not considered equal citizens; they are seen merely as objects to help men achieve their wants and objectives. As a result, violence against women and girls is not condemned as a socially unacceptable behavior, as it should be, but is instead tolerated and condoned by society."[48]

Catherine's credible testimony and supporting evidence demonstrate that she is a member of the particular social group of Honduran children perceived of as property by virtue of their position within the family, and that she was persecuted as a result of her membership.

D. One Central Reason Catherine was Persecuted Was Her Membership in the Particular Social Group Comprised of Honduran Children Without Effective Familial Protection

A central reason for Catherine's persecution by her father was her membership in the particular social group comprised of Honduran children without effective familial protection. Catherine's nationality and status as a child are immutable characteristics. Her lack of effective familial protection and the fact that she was abused and exploited by her father were not traits within Catherine's ability to change or choose. Furthermore, as child labor exploitation is common in Honduras, her father could harm and threaten Catherine with impunity. As with other children in Honduras without familial protection, Catherine was easy prey for her father.

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[47] *See* id., at ¶¶22-24.
[48] *See* Exhibit D at ¶23.

Additionally, in Honduras, violence against women and girls is rampant, and child abuse, rape, and sex trafficking are extremely serious problems.[49] Patriarchal attitudes and widespread discrimination against women, combined with the fact that the Honduran government does not adequately protect women and girls, has led to a culture of impunity with regards to violence against women and girls and femicides.[50] International organizations consistently report that the systemic subjugation of Honduran women and children fuels an ongoing pattern of gender violence, abuse, and killings.[51] Given this, Honduran girls and young women without familial protection are a clearly socially distinct and particularly defined group in Honduran society.

E. One Central Reason Catherine Was Persecuted Was Her Membership in the Particular Social Group Comprised of Children of Joe Father

A central reason Catherine was persecuted was her membership in the particular social group comprised of children of Joe Father. Catherine's status as a child is an immutable characteristic at the time the men persecuting her family killed her uncle and sought to harm her father and his children. These same men sought to harm Catherine because she was the daughter of Mr. Father.

Here, the motive to harm Catherine is none other than her status as her father's child. As the BIA noted in *Matter of L-E-A-*, "It is clear that nexus would be established on family membership where a persecutor is seeking to harm the family members because of an animus against the family itself."[52] Catherine's biological relationship to her father is not only a central reason, it is *the* reason the men who killed her uncle and are after her father seek to harm her.

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[49] *See* Situation of Human Rights in Honduras, Exhibit J at ¶110. *See also* Exhibit C; *see also* Exhibit D at ¶23-24.
[50] *See* Exhibit E at ¶¶ 37 and 43.
[51] *See* id., at ¶¶ 34, 43, 49, and 64. *See also* Exhibit D at ¶ 58; *see also* World Vision Report, Children more Vulnerable than ever to Violence, Exploitation in Central America, Pushing Thousands to flee to U.S., Exhibit H; Special Rapporteur on violence against women finalized country mission to Honduras, Exhibit I; and Exhibit J at ¶110.
[52] *See*, *Matter of L-E-A-*, I&N Dec. 40 (BIA 2017).

Fearful for her safety, not having any family to protect her, and knowing that local law enforcement authorities in her country were unable to protect her from her father or her uncle and father's persecutors, Catherine fled to the United States.

F. Another Central Reason Catherine Was Persecuted Was Her Political Opinion

Another central reason for Catherine's persecution was her actual or imputed political opinion. Specifically, Catherine possessed or was imputed to possess a political opinion that Honduran children have rights and deserve effective protection during their childhood.[53]

For an opinion to qualify as "political," it need not pertain to a particular political group, and may be expressed through actions or words.[54] The applicant need not consider herself an activist or dissident, or "couch [her] resistance in terms of a particular ideology."[55] The applicant must demonstrate, "through some evidence, either direct or circumstantial, that the persecutor knew of the applicant's political opinion and has or likely will persecute the applicant because of it."[56] For example, courts have recognized that a woman's resistance to male domination and oppression can constitute an expression of political opinion.[57]

In the instant case, Catherine, expressed her political opinion by resisting her father's abuse against her sisters,[58] and she repeatedly asserted her political opinion every time that she defended her sisters.

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[53] In the alternative, we propose that Catherine holds the political opinion that she, as a Honduran girl or young woman, has rights to her bodily integrity.

[54] *See Chang v. INS*, 119 F.3d 1055, 1093 (3d Cir. 1997), superseded by statute on other grounds as stated in *Li v. Attorney General*, 633 F.3d 136 (3d Cir. 2011).

[55] Id. at 1063.

[56] Id.

[57] *See, e.g.*, *Lazo-Majano v. INS*, 813 F.2d 1432, 1435 (9th Cir. 1987) (granting asylum to woman who asserted her political opinion by failing to accept without rebellion her persecutor's belief that a man has the right to dominate), overruled on other grounds, *Fisher v. INS*, 79 F.3d 955, 963 (9th Cir. 1996).

[58] *See* Exhibit A at ¶ 10.

G. The Honduran Government is Unable or Unwilling to Protect Catherine

The Honduran government is unable or unwilling to protect Catherine from her persecutors. Her persecutors were her own father and men that wanted to harm her because of her biological relationship to her father. The country conditions evidence indicates that the Honduran government is unable or unwilling to prevent either child abuse or control criminal actors seeking to harm children.[59]

H. Presumption of a Well-Founded Fear of Future Persecution

Having suffered past persecution on account of a protected ground, Catherine is entitled to the regulatory presumption that she has a well-founded fear of future persecution on the same basis as her original claim. *See* 8 CFR § 208.13(b)(1). There has been no fundamental change in circumstances in Honduras. To the contrary, country conditions evidence indicates that the abuse of girls or young women lacking familial protection, child abuse and exploitation and gang violence are endemic in Honduras, and unprotected children and youth like Catherine continue to face significant danger there.

Catherine cannot safely relocate within Honduras. As an initial matter, there is no safe place where she could relocate. In addition, as Catherine remains a young, vulnerable Honduran girl without significant resources, it is not reasonable to expect her to relocate on her own.

I. Even if the Presumption of a Well-Founded Fear Has Been Rebutted, Catherine is Entitled to a Discretionary Grant of Humanitarian Asylum

Even if the presumption that Catherine has a well-founded fear of persecution on the same basis as her original claim were rebutted, she warrants a discretionary grant of asylum. *See* 8 CFR § 208.13(b)(1)(iii). Catherine has demonstrated that she has compelling reasons for not

[59] *See* Exhibit I; Exhibit J at ¶ 110; Exhibit E at ¶¶ 64, 71, and 82; Exhibit D at ¶¶22-44, and 47-70.

wanting to return to Honduras due to the severity of her past persecution. In addition to witnessing domestic violence perpetrated by her father against those in her household, Catherine was brutally abused by her father. She remains traumatized by the physical beatings and verbal and emotional abuse by the mother. She also fears the men that killed her uncle and reportedly were seeking her out. Considered cumulatively, the harm she suffered was sufficiently severe so as to warrant a discretionary grant of asylum even in the absence of a well-founded fear.

IV. Conclusion

As discussed above, Catherine has demonstrated that she is statutorily eligible for asylum. She is not subject to any of the mandatory bars to asylum, and there are no adverse discretionary factors present in her case. She has demonstrated past persecution on account of several protected grounds, including membership in the particular social groups comprised of Honduran children who are perceived of as property by virtue of their position in the family; Honduran children without effective familial protection; and, children of Joe Father. Catherine was also persecuted because of her political opinion that Honduran children have human rights and deserve effective protection from abusive parents during their childhood. Additionally, Catherine fears the men who killed her uncle and who she believes may seek to kill her for being her father's child. Catherine has suffered significant trauma, and she has a well-founded fear of future persecution on the same bases. Therefore, it is respectfully requested that her application for asylum be approved.

Dated:

Respectfully submitted,

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