U.S. Citizenship and Immigration Services Vermont Service Center, VAWA Unit 75 Lower Weldon Street St. Albans, VT 05479-001

Re: Application for T Nonimmigrant Status for (A#

Dear USCIS Officer:

Please find enclosed an application for T Nonimmigrant Status filed on behalf of our client citizen and victim of a severe form of sex trafficking pursuant to the Trafficking Victims Protection Act (TVPA). We request that all information relating to this application remain confidential because of the nature of this human trafficking case.

I. DOCUMENTS ENCLOSED WITH THIS APPLICATION

(principal)

- Form G-28, Notice of Appearance of Attorney;
- Form I-914, Application for T Nonimmigrant Status for
- Form I-912, Request for Fee Waiver and Supporting Documents:¹
- Form I-192 of _____, Application for Advance Permission to Enter as a Nonimmigrant; and
- Index of Evidence and Supporting Documents.

(child)

• Form I-914, Supplement A of daughter,
Application for Family Member of T-1 Recipient.

¹ Please note that fee waivers for T visa applications are permissible pursuant to 8 C.F.R. 103.7(c)(3)(xviii).

II. SUMMARY OF ELIGIBILITY FOR T NONIMMIGRANT STATUS

We request that I-914 Application for T Nonimmigrant Status be approved on the following statutory grounds:
 is physically present in the United States on account of trafficking in persons; is a victim of a severe form of trafficking in persons; would suffer extreme hardship involving unusual and severe harm upon removal; and has complied with all reasonable requests for assistance in the investigation and prosecution of acts of trafficking in persons.
As described more fully in affidavit at Exhibit 1, is a victim of a severe form of trafficking within the meaning of the TVPA. In husband at the time tricked into coming to the United States to sightsee, but she subsequently learned that he was in fact fleeing from loan sharks involved in organized crime. She learned from her family members in that loan sharks were violently threatening them over nonpayment of the debt and searching for both and her husband. In now ex-husband abandoned her in the United States, leaving her shackled to his exorbitant gambling debts and extremely vulnerable to her traffickers' tactics of manipulation and coercion. In was was tricked by a so-called friend into handing over her savings to pay for legitimate massage classes. In reality, the friend trafficked her into a massage parlor where she was forced to provide sexual services to customers. She was subjected to constant surveillance, prevented from leaving the massage parlor, and threatened with deportation and arrest if she attempted to reject customer demands for sexual services. Her traffickers also photographed her passport and threatened to harm her family in failed to comply.
was not freed from the control of her traffickers until she was arrested by the New York Police Department in the of After her arrest, she came into contact with Sanctuary for Families and other nonprofit service providers dedicated to assisting survivors of gender-based violence. In hopes of bringing her traffickers to justice, asked her attorneys to assist her in reporting her experiences to the Federal Bureau of Investigation ("FBI"). In met in person with FBI and multiple times and recounted all details of her trafficking experiences to the best of her recollection. In addition, she authorized her attorneys to provide any other follow-up information requested by the FBI. See Exhibit 4, Affidavit of Neither the FBI nor any other law enforcement agency has made any other requests for assistance, but remains eager to cooperate with future requests in any investigation or prosecution of her traffickers.

would suffer extreme hardship due to her personal circumstances, ongoing symptoms of trauma, and likelihood of social ostracism and discrimination. See 8 C.F.R. 214.11(i)(2). First, faces violent retaliation from her exhusband's loan sharks for nonpayment of her ex-husband's gambling debts. In loan sharks have a history of targeting family members with violence in order to force debt repayment, with mpunity from local police. See Exhibits 19-21. These loan sharks have already threatened family in order to pressure them for money and information regarding the whereabouts of and her ex-husband.	
Second, is unable to access mental health counseling and other urgently needed support services in She has experienced complex and long-term trauma due to her childhood sexual abuse, her domestic violence during her marriages, and her trafficking experiences in the United States. See Exhibit 9, Letter of Case Manager To help her continue her journey to recovery, plans to continue receiving counseling by On the other hand, if were forced to return to she would struggle to find assistance in she weak and largely nonexistent mental health infrastructure. See Exhibits 14-17. Millions of people suffer from mental health issues in yet less than 6% of these sufferers receive treatment. See Exhibit 15. The ack of access is compounded by the extreme stigma attached to mental health problems.	
case, this stigma is exacerbated by the causes of her trauma. Sex is a taboo subject in and she would face social ostracism and potentially even persecution if she attempted to seek help openly as a victim of sex trafficking. has been consistently scored as a Tier 3 country by the Department of State Trafficking in Persons Report, meaning that it fails to meet even minimal standards to combat trafficking and assist victims. <i>See</i> Exhibit 18. In contrast, in the United States has been able to take steps to bring her traffickers to justice by reporting her experiences to the FBI.	
In conclusion, based on the enclosed Form I-914 and the attached supporting documents, we respectfully request that application for T-1 Nonimmigrant Status and her daughter's application for T-3 Nonimmigrant Status be granted. If you have any questions, please do not nesitate to contact me by phone at by email at the or by regular mail at the or provided the status of the statu	
Sincerely,	
Sanctuary for Families	

UNITED STATES DEPARTMENT OF HOMELAND SECURITY UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES

Affidavit describing "yes and "unclear" responses to questions on Application for T Nonimmigrant Status on Form I-914	AFFIDAVIT OF A#
STATE OF NEW YORK)) ss.:	
COUNTY OF NEW YORK I, pursuant to 28 USC §1746, d correct:	eclare that the following is true and
I was born I am submitting this affidavit in s Nonimmigrant Status on Form I-914 batrafficking. I am submitting this affidav Form I-914.	support of my application for my T sed on my status as a victim of human
2. With respect to Part B, Other Names Use of my name that appears on certain certificate of disposition from	ed, is an incorrect transliteration of government documents, including my Criminal Court.
federal law enforcement authorities on experience. I met with agents from the The first meeting occurred on	nt B, Declaration of Law Enforcement roons. I authorized my attorney to contact to report my trafficking rederal Bureau of Investigation two times. and the second meeting occurred have not reached out to request additional
	arrested for any reason, whether I have ne or offense, whether I have been placed ative program, and whether I have ever ted, charged, and have been in jail two
	traffickers' control and being trafficked lew York police officers who charged me ge. The case was referred to the

	in	of New	York and l	nas been
ordered dismissed and sealed.		-		

On I I was arrested under the charge of performing massage without a license in New York. However, this charge was dropped and I was never prosecuted.

- 5. With respect to Part D, Question 2(a), I have answered "No" in response to if I have engaged in prostitution. While I was under my traffickers' control, they coerced me into providing commercial sexual services against my will. Therefore, I do not view myself as having engaged in prostitution.
- 6. With respect to Part D, Question 8(a), I have answered "yes" as to whether I have ever been present or nearby when someone was intentionally killed, tortured, beaten, or injured that person being myself. I was beaten by my stepfather when I was a child. I was also abused by my ex-husband in In addition, customers at the massage parlor where I was trafficked frequently used violence against me, such as hitting me, pulling my hair, and strangling me, if I refused their demands.
- 7. With respect to Part D, Question 8(c), I have answered "yes" as to whether I have ever been present when any person was in any way compelled to engage in any kind of sexual contact—that person being myself. I was sexually assaulted as a child by a neighbor. Later in life, my first husband would have sex with me against my will during our marriage. In addition, my traffickers coerced me into engaging in sexual contact with customers while I was under their control. I was frequently sexually assaulted by customers at the massage parlor.
- 8. With respect to Part D, Question 16, I answered "no" as to whether I have ever by fraud or willful misrepresentation of a material fact sought to procure a visa or any other immigration benefit. My ex-husband prepared our applications for U.S. visas without my assistance and I am unsure of the content of those applications. To my knowledge, there were no misrepresentations.

[SEE FOLLOWING PAGE FOR SIGNATURE]

	Dated:
	New York, NY
Sworn to and subscribed to before me this day of 20	
Notary Public	
I, declare that I am competent to trans	slate English into and that I
have read and translated this affidavit to	
SIGNED:	
Sworn to and subscribed to before me this day of 20	

UNITED STATES DEPARTMENT OF HOMELAND SECURITY UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES

Affidavit in support of Application for T Nonimmigrant Status on Form I-914	AFFIDAVIT OF A#
STATE OF NEW YORK)) ss.: COUNTY OF NEW YORK)	
I, pursuant to 28 USC §174 following is true and correct:	16, declare under penalty of perjury that the
support of my application for T No.	m a citizen of where I was born on I. I am submitting this affidavit in nimmigrant Status on Form I-914. I am as based on being a victim of human
services to customers at a massage deliberately tricked me out of all of be legitimate massage classes. Instepenniless and completely financiall parlor, my boss and coworkers refuthrough constant monitoring by videustomer demands for sex, and three police. During this time, I was beat customers. I have reported my traff	ked and pressured me into providing sexual parlor against my will. One of my traffickers my savings as "tuition" for what I believed to ead, because of the fraud, I was rendered y dependent on my traffickers. At the massage sed to let me leave and ensured compliance leo camera, pressuring me to succumb to eatening me with deportation if I called the en and violently sexually assaulted by ticking experience to the federal authorities and my investigation they seek to pursue.
	nces I suffered at the hands of my traffickers, ent, and the extreme hardship I would suffer if
	with my mother, step-father, childhood. We were poor, and we often barely

5. Because I was not biologically related to my stepfather, we had a very bad relationship. When I was little, I would often fight with my step-siblings. I had a very sensitive personality and was rather introverted. Whenever the smallest thing happened, I would become upset. But then my step-father would begin beating

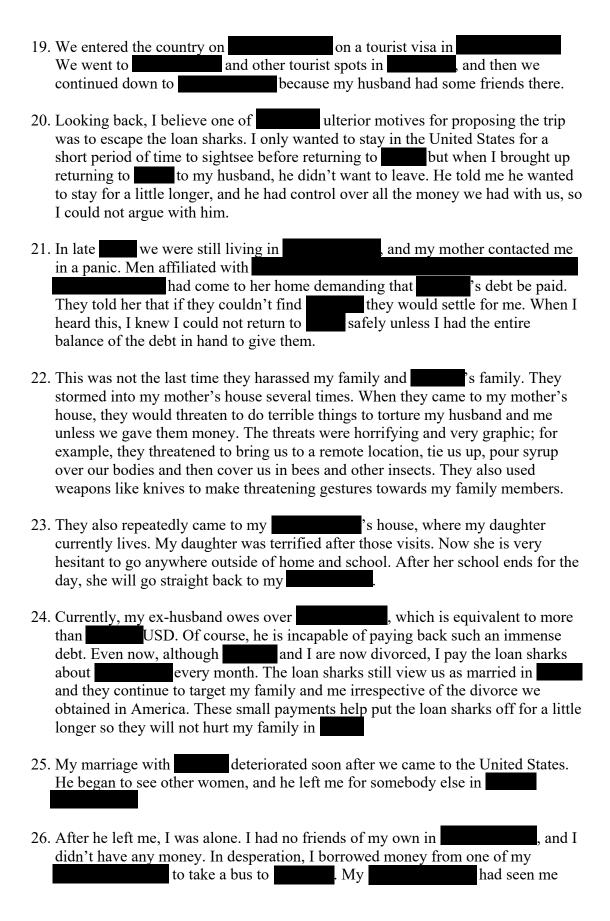
like I could not find any love or warmth in that household. 6. While I was in school, during approximately , I was sexually assaulted by a male neighbor. He was a migrant worker who lived nearby with his family. He would talk with me on my way to and from school. Eventually, he offered to take me to a park. At the park, he raped me. Because I was so young, I had no concept of what sex even was. All I knew was that I felt violated and ashamed. I never told my family about what happened. 7. The sexual assault was traumatizing for me. I had very low self-confidence after the attack, and combined with my unhappy home life, I believe I was very vulnerable when I met my first husband, . at years of age. We met at a right after I had graduated from and after only a few months, we decided to get married. His mother was very kind and warm towards me, and I was very naive because of my young age. Even though there were some parts of spersonality I did not like and he did not treat me very well, I impulsively decided to stop going to school and marry him. I believed I would finally be part of a loving household. 8. My parents also supported the marriage because his family members were in the . His grandfather was even the department. 9. After our marriage, however, things only became worse and worse. I became pregnant, and when I was months along, we discovered the child was a girl during an ultrasound. Due to . My husband's family forced me to get a late-term abortion. One of the worst moments of my life was my lifeless baby lying next to me. 10. My husband's bad qualities also became more and more apparent. He loved to go out gambling and drinking. He would not come back home until late at night. When he returned home, he would often force me to have sex with him even if I did not want to do so. I remember many nights when I was crying while having sex with him. I later realized he was carousing with other women and exposing me to sexually transmitted diseases. 11. Finally, in Jasked for a divorce. He became infuriated. I had never seen him like this before. He grabbed a knife and sliced across my cheek, then locked me in the house. I was imprisoned there for three days and three nights. In those moments, I felt defeated with my entire body. I didn't try to leave and go to the hospital. I simply didn't feel like I had the strength to do anything.

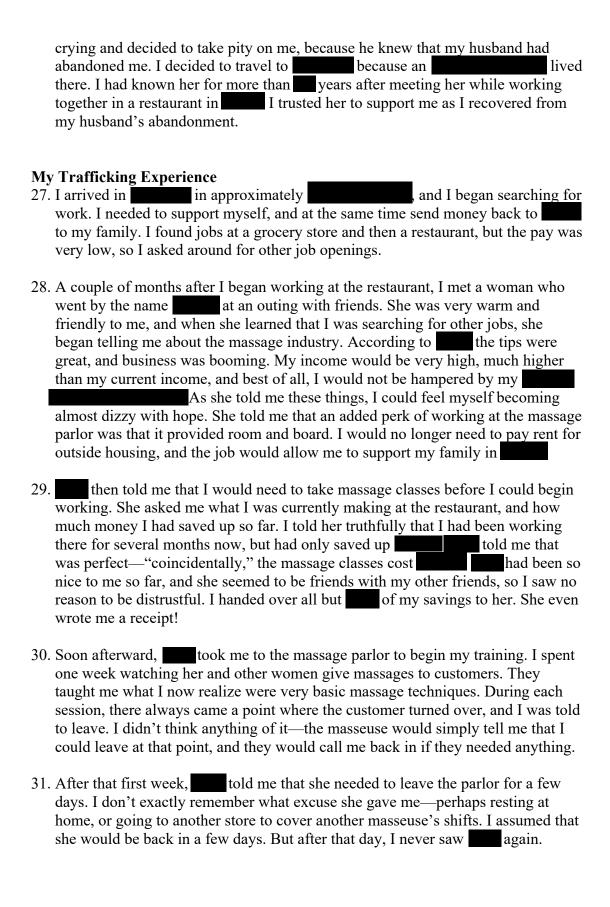
12. My husband began locking me into the house regularly, for two or three days at a time, every time I brought up divorce again. He would scream at me and threaten to kill my entire family if I left him. I was terrified that he would truly carry out

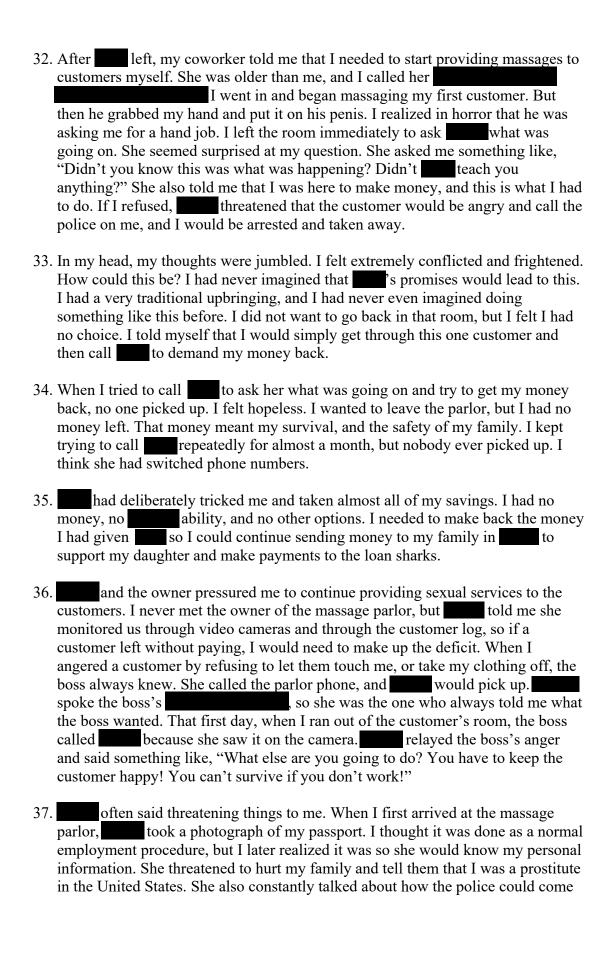
me. He used a stick to beat my step-siblings and me, often leaving bruises. It felt

Eventually, after a few months, I stopped asking him for a divorce. 13. Around this time, I also discovered I was pregnant. This time, I was pregnant with a boy, so I was able to carry him to term. My son, was born on I thought that after my son was born, might become more responsible and loving. But he did not try to find a steady job. He would not even take care of our son. I had to entrust my son with my mother and go out to work to support us. I travelled to the surrounding cities and worked in different restaurants, sending money back to support our son. 14. At the end of I was finally able to obtain a divorce from I was terrified to bring up divorce to him again because of his past reactions, so I deliberately asked my to accompany me. agreed to the divorce, and I was able to leave him for good. He demanded that our son stay with him, however. His family has not allowed me to see my son in person ever since, but I have managed to keep in touch with my son online. My Second Husband's Targeting by Loan Sharks, and Our Journey to the U.S. 15. In A mutual friend introduced us. We had a wonderful relationship at first, and we married in year. 16. Soon after we got married, however, I discovered that he was a heavy gambler. He gambled wildly and couldn't seem to stop himself from losing more and more money. He could not borrow money from regular lenders for these gambling debts, so he turned to dangerous underground lenders. These loan sharks had a copy of his personal identification card, so they could easily track down his family information if he failed to pay the money back. At that time, however, I had no idea how deep his debts truly ran. 17. In I I had my second child, a daughter named I was allowed to have a second child because had no children. She currently lives with my in and I am applying for her as a derivative family member in conjunction with this application. 18. As the years went by, my husband began to gamble more and more. He stayed out late at night and sometimes would not even come home. I was angry and hurt by his behavior, and we had many arguments. After a particularly bad argument, in , my husband brought up the idea of going to the United States on vacation to help us relax and re-connect. I happily agreed, and he told me he would take care of all the visa and travel arrangements.

this threat, especially because his family was so powerful in our community.







- and arrest me if an unhappy customer decided to call them. Hearing these threats made me feel anxious and upset all the time. I felt very withdrawn and isolated.
- 38. Customers paid a fee of \$60 an hour, but I could keep only the tips that they provided. Each day, I needed to service approximately three to six customers. These customers were often very violent and forceful, and they pressured me to do more than what we agreed. I have been strangled multiple times by violent customers.
- 39. One of my first few customers became angry with me because I did not want to have sex with him. He pushed me off the massage bed, and I slammed my elbow against the wall. The surrounding area on my elbow became discolored and extremely swollen. I went to for help afterward, but she didn't seem to care at all. I asked her to let me go see a doctor and get some medicine, but she told me that I was not allowed to leave the massage parlor. I was shocked. told me that it was just one of the rules of working in the massage parlor.
- 40. But after about a week, my arm was still not healing, so I begged to let me at least purchase some medicine from the store. It was only a block away. If finally agreed to let me go, but she required me to leave all of my belongings in the parlor, including my purse. She gave me thirty dollars in cash and let me go. I think she did not let me take anything because she was worried I would use this chance to escape. I couldn't go anywhere without my passport or wallet, and she knew that. This was the only time she let me leave the massage parlor during the months that I was there.
- 41. Another time, a customer came in and demanded a hand job. I began to give him a hand job, but then he demanded to put his penis in between my thighs. I reluctantly agreed because I thought it would make him leave faster. But without warning he pushed me over violently and shoved my shoulders against the bed, and then penetrated me without a condom. I shouted "No," repeatedly, and called out to I tried to struggle, but I could not get free. Finally I was able to push him out, and he demanded a refund. It is hard for me to remember exactly what happened because I was in such a panic. I remember that did not have much of a reaction. She did not seem concerned at all, and she treated the incident as normal.
- 42. I was too afraid to call the police because of what had told me about being arrested and deported. I was afraid that I would be deported, penniless, and be forced to face the loan sharks without any money to pay them. I felt so much regret and self-loathing. I could not go home to yet I didn't even know English to work properly in America. Somehow I needed to make money to keep my family safe. I just didn't know what to do.

	In It was arrested by the police at the massage parlor. The arrest was a very frightening experience, but because of the arrest, I was able to escape from the massage parlor and find other work.
	After this arrest, I was transferred to the and they connected me to Sanctuary for Families. I did not know that there were organizations out there that could help women like me. They told me that I was eligible for T nonimmigrant status, and they began helping me prepare to apply. Sanctuary for Families also helped me begin counseling. I have struggled with depression and anxiety after being trafficked, and these services have helped me begin to recover.
	ope <u>ration with Law E</u> nforcement
	On, I authorized my lawyer to report my trafficking experience to the New York State Division of Criminal Justice Services. On Mr. Carl J. Boykin, Director of Human Trafficking at the Division of Criminal Justice Services, confirmed in a letter that I am a victim of human trafficking under New York State Penal Law § 230.34.
	In addition, I have met with federal law enforcement agents to report my trafficking experience to them, and my lawyer has been in contact with them to provide any other information they might need.
	On I met with at the Federal Bureau of Investigation offices in New York. They interviewed me for approximately three hours, and I answered all of their questions to the best of my ability.
	On I met with a second time at the FBI offices in New York. This meeting took approximately two hours. They asked me many follow-up questions, and I gave them as much information as I could remember.
	I have authorized my lawyer to comply with any requests for additional information from law enforcement. I remain eager to cooperate with them, and I very much hope my traffickers are brought to justice for what they did.
50.	I hope that I can remain in the United States because I would suffer extreme hardship if forced to return to The majority of my ex-husband's debt is still unpaid, and the loan sharks harassed and threatened my family multiple times searching for me. I fear that if I return without the money to pay back the debt, they will seriously hurt or even kill me. There is truly nowhere you can run, and no one

will help you, including the police, many of whom are corrupt and cooperate with loan sharks. Going back is a sure death sentence for me.

- 51. Because of my trafficking experience, I also would not be able to find the support I need in is still extremely traditional and conservative when it comes to sex, especially in the countryside. I grew up in a very traditional household, and because of this, I have never been able to tell my family about my childhood sexual abuse. If my family had any idea about what happened to me in the United States, they would not even let me enter the front door. They would be furious and ashamed because to them, I have disgraced our ancestors. In society, I would be discriminated against and condemned even though I am a victim. In contrast, in the United States, I have received supportive counseling to help deal with the lingering trauma from my trafficking experience. If I were returned to I have no doubt that I would not be able to receive this kind of support to help me heal.
- 52. Part of this healing process has also been the opportunity to report my experiences to law enforcement in the United States. I very much hope that the FBI can investigate my traffickers and hold them accountable for their actions. If I am returned to I would lose the opportunity to assist in any future investigations and seek justice for what happened to me.
- 53. I very much hope I can remain in the United States where I am safe and can continue to recover and rebuild my life.

[SEE FOLLOWING PAGE FOR SIGNATURE]

Wherefore, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.
Sworn to and subscribed to before me this day of 20
Notary Public
I,, certify that I am competent to translate English into and that I have read and translated this affidavit to
Sworn to and subscribed to before me this day of 20
Notary Public

INDEX OF SUPPORTING DOCUMENTS FOR THE T NONIMMIGRANT STATUS APPLICATION OF (A#

			D	ocument relates	to:	
EXHIBIT #	Document	Victim of a Severe Form of Trafficking	Present in the United States on Account of Trafficking	Cooperation with Law Enforcement	Extreme Hardship of a Severe and Unusual Nature	Alien Information
1.	Affidavit of describing her experiences as a victim of a severe form of trafficking, her presence in the United States on account of trafficking, her cooperation with law enforcement, and the extreme hardship she would face if removed	X	X	X	X	X
2.	Affidavit of providing additional information in response to questions on Form I-914	X	X			X
3.	Affidavit of providing additional information in response to questions on Form I-192	X	X	X	X	X
4.	Attorney Affidavit of attesting to cooperation with law enforcement agents, including copies of email correspondence with the Federal Bureau of Investigation	Х	Х	X		
5.	Copy of biographic pages f the passport of		X			X

			Document relates to:				
EXHIBIT #	Document	Victim of a Severe Form of Trafficking	Present in the United States on Account of Trafficking	Cooperation with Law Enforcement	Extreme Hardship of a Severe and Unusual Nature	Alien Information	
6.	Copy of birth certificate of with certified English translation					X	
7.	Certificates of Disposition from Criminal Court showing that all charges in relation to her arrests have been dismissed and sealed					X	
8.	Letter from New York State Division of Criminal Justice Services to New York State Office of Temporary Disability and Assistance, Notice of Confirmation as a Human Trafficking Victim in New York State	X		X			
9.	Letter of Support from former Case Manager at Sanctuary for Families	X	X		X	X	
10.	Polaris Project, June 1, 2018, "Human trafficking in massage parlors: a deeply manipulated sense of choice."	X					
11.	Polaris Project, January 2018, "Human Trafficking in Illicit Massage Businesses: Executive Summary."	X					

			Document relates to:			
EXHIBIT #	Document	Victim of a Severe Form of Trafficking	Present in the United States on Account of Trafficking	Cooperation with Law Enforcement	Extreme Hardship of a Severe and Unusual Nature	Alien Information
12.	National Human Trafficking Resource Center Fact Sheet: Fake Massage Businesses	X				
13.	Polaris Project Fact Sheet: Massage Parlors in the United States	X				
14.	2017 World Health Organization ("WHO") Mental Health Atlas Profile for with 2017 WHO Mental Health Atlas Profile for United States for comparison				X	
15.	Sarah Johnson, "Millions of people with mental illnesses in and going untreated, study finds," <i>The Guardian</i> (May 18, 2016).				X	
16.	I-Ting Shelly Lin, "The Mental Healthcare Industry in Briefing (June 12, 2018).				X	
17.	Johan Nylander, mental health care system is lacking," <i>CNN</i> (May 6, 2014).				X	
18.	2018 Department of State Trafficking in Persons Report on indicating Tier 3 Classification				X	

			Document relates to:			
EXHIBIT #	Document	Victim of a Severe Form of Trafficking	Present in the United States on Account of Trafficking	Cooperation with Law Enforcement	Extreme Hardship of a Severe and Unusual Nature	Alien Information
19.	Zoe Loe, "Loan shark gets 14 years for raping victim who couldn't pay," Morning Post (Dec. 12, 2018).				X	
20.	"Killing draws attention to struggling counties plagued by debt violence," <i>Global Times</i> (Mar. 28, 2016).				X	
21.	"How debt collectors go to work," Global Times (June 20, 2016).				X	