

imprisoned for an unrelated offense for a time, but returned in the summer of 2015, when his stalking escalated. He would wait until E's father left their house, then try to break in. When he saw E on the street, he stopped her and showed her his gun threateningly. In December 2015, he and another gang member stopped E on the street and said her time to decide was up, and that he would kill her if she didn't become his girlfriend. They both pointed their guns at E to prove they were serious. Terrified, E fled El Salvador. **An attorney licensed in any state** is needed to help E file an asylum claim with the **Arlington Asylum Office**. E's next Master Calendar Hearing in Immigration Court is in **July 2016**. E turns eighteen on **November 2016**.

Life in Home Country:

E was born to a poor family in San Sensuntepeque, Cabañas, El Salvador. Despite both of her parents working, her family always struggled to make ends meet. To make matters worse, the street corner outside their house became a well-known MS-13 gang hang out spot, with sometimes as many as twenty gang members sitting outside their home for hours at a time. Because of this, E and her family could not simply come and go as they pleased—the gang always knew if their whereabouts.

As E grew older, she began to attract the attention of several of the gang members. One of the gang leaders—E never learned his name—particularly fancied her, and would harass her every time she left her house. The harassment began in 2015, when he asked E to be his girlfriend and she said, "Maybe later." Answering "yes" or "no" would have been a lose-lose situation for E. As she explained, girlfriends of gang members do not last long in El Salvador, and are often killed by rival gang members to get back at their boyfriends, or are even killed by their boyfriends when they want a new girlfriend. And the gang leader insinuated that if E said "no" he would kill her on the spot. E was forced to continuously put off his advances, always knowing that he would be back again. It was exhausting, and E eventually dropped out of school to hide inside her house.

Around the end of 2015, the gang member was arrested and thrown in jail (E does not know why he was imprisoned). With him gone, MS-13 didn't bother E as much anymore, and she hoped everything had been resolved. She even felt safe enough to leave her house and begin working as a cleaning lady. But in the summer of 2016, the gang member was released from prison, and he went right back to stalking E—this time with even greater intensity. Whereas before the gang member seemed a little playful, he now regularly surrounded her with other gang members, and displayed her his gun when he asked her to be his girlfriend. He would wait outside E's house until he saw her father leave to go to work and then try to force his way inside, banging on the door. Another time, the gang member dressed up in a Salvadoran soldier's uniform and tried to convince E's sister she needed to open the door because he was there on official government business. E's sister luckily kept the door shut—she knew that MS-13 in her area sometimes dressed up in soldiers' uniforms when they were going to go on killing sprees in town.

In December 2015, E was walking down the street when the gang member and another member came out of nowhere and cornered her. They both made her watch as they cleaned their guns, and the head gang member asked E for a kiss. When she didn't kiss him, he pointed his gun at her and said her time was up, that she had to be his girlfriend or he would kill her.

Comment [K1]: A good case summary gives a quick overview of how the child qualifies for relief. Specifically, it quickly tells the reader: where the child is from; what happened to the child (what kind of violence they suffered) in their home country; what specifically made them leave their home country; and what kind of relief they potentially qualify for. NOTE: This section does not focus on the child's journey to the US.

Comment [K2]: The first paragraph should establish where the child is from, their general socioeconomic situation, and what their basic situation was while growing up (including who they lived with, if they went to school, etc.).

Comment [K3]: The next two to three paragraphs should focus on the things in the child's life that could qualify them for SIJS or Asylum.

If the child might qualify for asylum (as the child in this example does), we need to establish a pattern and timeline of specific instances when the child was threatened, how they were threatened, where they were threatened, why they were threatened, and who did the threatening. We need to know if any weapons were involved and if they were ever physically harmed. As you can see, this example focuses on explaining in detail how she was threatened, how many times, who did it, and why. The more detail the better!

The other possible form of relief is SIJS. If one or both parents have abandoned, abused, or neglected the child, the child might qualify for SIJS. We need to establish a pattern and timeline of abandonment, abuse, or neglect with specific examples and in-depth detail. We also need to know if the parent(s) also harmed any other children or their spouse, had confrontations with neighbors, were in trouble with the police, or abused drugs or alcohol—basically, do they have a history of violence and how did this impact the child?

KEEP IN MIND that in order to find an avenue of relief for a child, we must establish what happened to the child IN THEIR HOME COUNTRY, not just on their journey to the US.

Then, luckily, he left. Terrified, E [REDACTED] ran home and barricaded herself in her house. As soon as her family could scrape together enough money, they sent her to the US.

Comment [K4]: The last paragraph should focus on the incident that forced the child to leave and come to the US. What was one specific instance that was the breaking point? What happened that forced them to give up everything they have ever known for a dangerous trip northward? When specifically did they finally leave?

Trip to US:

E [REDACTED] traveled with a guide to the United States. She does not report any abuse during her journey or at the hands of U.S. Border Patrol. E [REDACTED] crossed through the United States border on February [REDACTED], 20[REDACTED] and was released from the shelter to her aunt in Manassas, Virginia on April [REDACTED], 2016.

Comment [K5]: Anything that happened to the child during their journey should only go in this section, not the one above. Usually 2-3 sentences is enough to do the job. More information is needed if the child was abused during their journey, kidnapped, or if US immigration were responsible for some kind of harm to the child.

Current Living Situation:

E [REDACTED] now lives with her aunt M [REDACTED], who is a naturalized U.S. citizen. They have a good relationship, and E [REDACTED] feels comfortable and safe residing in Virginia.

Other Important Information:

After E [REDACTED] left, MS-13 gang members continued to ask E [REDACTED]'s older sister about her whereabouts. When they decided what E [REDACTED]'s sister said was true—that Evelin had gone to the U.S.—they started targeting her instead.

E [REDACTED]'s aunt M [REDACTED] has gone to Manassas Park High School three times to try to enroll E [REDACTED] in school, but they keep denying her. They say that E [REDACTED] is no longer eligible to enroll in school because summer vacations are almost here, and that she will be too old for next school year (she will be [REDACTED]). E [REDACTED]'s aunt is furious but does not know how to proceed.

Comment [K6]: Anything that does not fit into the narrative above, but you still feel is important, should go here. Usually it is only 2-3 sentences at most.

RECOMMENDATIONS FOR RELIEF*

Comment [K7]: This is usually filled in by the KIND Pro Bono Attorney before placement, so there is no need to fill out this section unless you would like to.

ASYLUM

Past Persecution:

E [REDACTED] was targeted by a local gang leader repeatedly for approximately a year and a half. He threatened to kill her multiple times, even pointing a gun at her. He tried to force himself inside her house and even dressed like a Salvadoran soldier to try to convince her to open the door.

Fear of Future Persecution:

The gang member told E [REDACTED] that her time to decide if she was going to be his girlfriend was up, and he would kill her if she did not give him an answer.

On Account of: *(name possible PSG if applicable)*

Salvadoran girls who are marked as a “girlfriend” by MS-13 and seen as property of gang members.

Government Action or Inaction:

E [REDACTED] has never reported the gang member's harassment for fear of retaliation, but the Salvadoran government has a history of being unable or unwilling to control gang violence and, especially, violence against women.

Relevant Deadlines: *(1 year filing deadline for asylum, date of reunification)*

Even though she is a UAC, E [REDACTED] should file for asylum by February [REDACTED], 20[REDACTED], which is one year after her date of entry.