



via email

October 29, 2020

Mr. Michael Dougherty
Ombudsman
Office of the Citizenship and Immigration Services Ombudsman
U.S. Department of Homeland Security
Mail Stop 0180
Washington, D.C. 20528

**RE: SYSTEMIC IMPLEMENTATION ISSUES AT USCIS WITH THE LIBERIAN
REFUGEE IMMIGRATION FAIRNESS (LRIF) PROGRAM**

Dear Ombudsman Dougherty:

We write today on behalf of the Catholic Legal Immigration Network, Inc. (CLINIC) to thank you and your team for the “Overview of the Liberian Refugee Immigration Fairness Program” webinar on Sept. 29, 2020. We also appreciate the time and effort put forth by your staff in meeting with our Director of Advocacy and your office’s assistance to USCIS customers and their legal representatives in resolving case issues. To that end, we write today to elaborate on the issues previously discussed and to seek resolution on several systemic implementation issues with the LRIF program. Specifically, we respectfully ask that the Ombudsman consider recommending that:

- 1. USCIS Should Implement More Efficient Processing Procedures**
- 2. USCIS Should Clarify and Reduce the Burden Associated with Unduly Restrictive Evidentiary Requirements**
- 3. USCIS Should Immediately Implement a Robust Outreach and Education Program to Reach as Many Potential Applicants as Possible Before the Deadline**

This letter goes into further detail regarding specific actionable items that USCIS can implement to accomplish the above recommendations. The adoption of these recommendations is particularly urgent as the deadline for LRIF applications ends on Dec. 20, 2020, closing the door to this opportunity for lawful permanent residency and the promise of full integration and U.S. citizenship. Please see the appendices to this letter for copies of redacted RFEs supporting the recommendations in this letter.

CLINIC’s work is guided by its Catholic identity and mission to welcome the stranger (Matthew 25:43) and thereby promote the rights and dignity of immigrants. CLINIC achieves its mission by serving and representing the nation’s largest network of nonprofit immigrant legal services

organizations. The following issues were tracked through CLINIC's affiliate network and partners who serve the Liberian community. Notably, as content to the below recommendations, a study by African Communities Together and the CLINIC-led Temporary Protected Status (TPS) Working Group, supported by research by the Center for Migration Studies, found that approximately 10,300 people may be eligible for LRIF.¹ During the Ombudsman's webinar, USCIS reported that 4,000 or less people would be eligible, which is not supported by the data.

I. State of Play Regarding LRIF Implementation at USCIS

Congress enacted LRIF on Dec. 20, 2019, with LRIF becoming effective that same day. Under the law, applicants must apply by Dec. 20, 2020. Rather than issuing implementing regulations, subject to a public notice and comment period, USCIS instead chose to issue guidance to the field by way of an update to its Policy Manual on April 7, 2020, more than three months into the twelve-month period.² While stakeholders were able to submit comments to the policy guidance, the process for commenting on Policy Manual updates is not public or uniform and, since there is no stakeholder engagement or procedural clarity, it is unclear as to how USCIS reviews, considers, and incorporates stakeholder comments to policy guidance. To date, USCIS failed to make or even acknowledge *any* changes—including CLINIC's or any other stakeholder recommendations—to the Policy Manual's section on LRIF since closing the comment period.

The delayed release of the USCIS Policy Manual guidance led to a significant gap between the effective date of the law and the ability for eligible LRIF applicants to submit their applications. The effect of this gap was a void in vital information needed by potential applicants and their legal representatives to make informed decisions on eligibility, preparation of applications, and collection of necessary evidentiary documentation. Based upon information we received from our network and partners, this delay in information correspondingly led to a delay in filings. By the time USCIS released the guidance to the public, our country was at the height of the pandemic outbreak and shelter in place orders, making legal representation and application preparation nearly impossible for a critical mass of potential applicants.

As reported by USCIS during the Sept. 29 webinar, USCIS has only received approximately 2,000 LRIF applications. We also understand that USCIS has only approved a tiny fraction of LRIF cases, with the first approval not coming until September 2020. USCIS consistently refuses to issue specific data sets regarding LRIF and family member applications and thus we rely on anecdotal evidence from our established network and partners to monitor implementation. This evidence has overwhelmingly indicated a troublesome trend in the disruption of adjudications via the issuance of Requests for Evidence (RFE), unnecessary and burdensome requests that merit review and attention from the Ombudsman. Furthermore, the case delays and RFEs are extremely concerning given the imminent Dec 20, 2020, deadline for the LRIF—RFEs risk leading to applicants leading to denials late in the application period, substantially reducing the time available for those applicants to reapply after curing the underlying issue that led to a denial.

¹ Donald Kerwin and Mike Nicholson, *The Liberian Refugee Immigration Fairness Program: Estimates of the Potentially Eligible*, Center for Migration Studies (June 12, 2020), <https://cmsny.org/the-liberian-refugee-immigration-fairness-program-estimates-of-the-potentially-eligible/>.

² Policy Alert - Liberian Refugee Immigration Fairness, U.S. Dep't of Homeland Sec., U.S. Cit. & Immigr. Servs., (Apr. 7, 2020), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20200407-LRIF.pdf>.

II. USCIS Should Implement More Efficient Processing Procedures

USCIS has opted to process LRIF cases through Field Offices, which indicates USCIS intends to interview most, if not all, applicants for LRIF and disperse adjudications to numerous adjudicating officers across the country. When Field Offices adjudicate cases, they are initially processed and then warehoused at the National Benefits Center. USCIS' decision to utilize Field Offices to adjudicate LRIF applications is extremely problematic as a single service center with dedicated, trained adjudicators would be substantially more effective in uniformly, correctly, and efficiently adjudicating and approving applications. The abundance of problematic, inconsistent, and legally incorrect RFEs referenced in this letter (see below) demonstrates that the concerns over these implementation choices by USCIS are fully justified. Moreover, the use of in-person interviews for applicants is not only not required by the underlying statute establishing LRIF, but also serves to unnecessarily delay adjudications, creates additional barriers for applicants, and risks the life and safety of applicants amidst a global pandemic.

USCIS has not fully reopened its offices as of the date of this letter.³ The agency currently faces a historic budget crisis and has begun to furlough contractors,⁴ exacerbating existing delays, particularly for LRIF applicants.⁵ While USCIS avoided furloughing nearly 70 percent of its staff, that delay came at “severe operational cost that will increase backlogs and wait times across the board, with no guarantee [to] avoid future furloughs.”⁶ LRIF applicants concurrently face an abundance of COVID-19–related obstacles, including financial inability to pay filing fees, limited or no access to representation, and health-related problems from COVID-19 itself.

In light of the above, CLINIC urges the Ombudsman to issue recommendations to USCIS to:

- 1. Adjudicate all applications at a single, centralized service center;**
- 2. Only require in-person interviews for LRIF applicants when there are genuine issues of fact or national security, instead of a blanket requirement for nearly, if not all, applicants; and**
- 3. Consider applications submitted after the deadline as timely submitted if USCIS had denied a previous application from that applicant before the deadline.**

³ *USCIS Response to COVID-19*, U.S. Dep't of Homeland Sec., U.S. Cit. & Immigr. Servs., (Aug. 6, 2020), <https://www.uscis.gov/about-us/uscis-response-to-covid-19>.

⁴ Daniel C. Vock, *Immigration Agency Cuts of 800 Kansas City Jobs Expected to Trigger Backlogs, Delays Nationwide*, Kansas Reflector (Sept. 10, 2020), <https://kansasreflector.com/2020/09/10/immigration-agency-cuts-of-800-kansas-city-jobs-expected-to-trigger-backlogs-delays-nationwide/>.

⁵ Electronic Letter from U.S. Dep't of Homeland Sec. to Stakeholders on Ombudsman's Alert: Card Production Delays at USCIS (July 21, 2020), available at <https://www.aila.org/infonet/cis-ombudsman-provides-update-on-card-production>.

⁶ *USCIS Averts Furlough of Nearly 70% of Workforce*, U.S. Dep't of Homeland Sec., U.S. Cit. & Immigr. Servs., (Aug. 25, 2020), <https://www.uscis.gov/news/news-releases/uscis-averts-furlough-of-nearly-70-of-workforce>.

III. Clarify and Reduce the Burden Associated with Evidentiary Requirements

The USCIS Policy Manual, USCIS website, and RFE boilerplate language suggest that applicants must present either an unexpired passport or certificate of naturalization to establish nationality and fail to reference alternative, acceptable forms of documentary evidence.⁷ For example, both the Policy Manual⁸ and website⁹ indicate that, to demonstrate Liberian nationality, an applicant must submit an “Unexpired Liberian passport; or Liberian certificate of naturalization.” RFEs 1, 2, 3, 5, 7, 8, 9, and 10 also contain identical language. Importantly, on the LRIF I-485 Special Instructions,¹⁰ Policy Manual,¹¹ and website,¹² USCIS indicates that acceptable evidence is “not limited to” a passport or certificate of naturalization website. USCIS, in its Policy Manual, website, and boilerplate RFE text, fails to indicate that there are other forms of acceptable evidence, particularly those forms of evidence that are covered in Form I-495 Instructions. This omission is particularly devastating because applicants may be unaware that they have alternative forms of evidence they may submit (including secondary evidence that they readily have available) because all of USCIS public-facing guidance fails to clearly specify the acceptance of these other forms of documentation.

In the Temporary Protected Status context, USCIS accepted a broad range of evidence of nationality, with the relevant Federal Register notice stating that:

Such documents may include a copy of your passport if available, other documentation issued by the Government of Liberia showing your nationality (e.g., national identity card, official travel documentation issued by the Liberian Government), and/or your birth certificate with English translation accompanied by photo identification. USCIS will also consider certain forms of secondary evidence supporting your Liberian nationality.¹³

We recommend that USCIS adopt the following boilerplate language in its Policy Manual, website, and evidentiary-related RFEs to applicants are fully informed regarding alternative forms of documentation they can provide, language taken verbatim from the Form I-485 instructions:

If you are unable to submit the required primary evidence (for example, a birth certificate or marriage certificate), you may provide secondary evidence (for example, church or school records) instead if you can explain why the primary evidence is unavailable. If you are unable to submit secondary evidence, you may submit two or more affidavits, sworn to or affirmed by individuals who are not

⁷ U.S. Dep’t of Homeland Sec., U.S. Cit. & Immigr. Servs., Policy Manual, Chapter 5 - Liberian Refugee Immigration Fairness (Oct. 15, 2020), <https://www.uscis.gov/policy-manual/volume-7-part-p-chapter-5> [hereinafter LRIF Policy Manual]; *Liberian Refugee Immigration Fairness*, U.S. Dep’t of Homeland Sec., U.S. Cit. & Immigr. Servs., (Aug. 12, 2020), <https://www.uscis.gov/green-card/green-card-eligibility/liberian-refugee-immigration-fairness>.

⁸ LRIF Policy Manual, *supra* note 7.

⁹ *Liberian Refugee Immigration Fairness*, *supra* note 7.

¹⁰ *Special Instructions for Liberian Refugee Immigration Fairness Applicants*, U.S. Dep’t of Homeland Sec., U.S. Cit. & Immigra. Servs., (Apr. 8, 2020), <https://www.uscis.gov/green-card/green-card-eligibility/liberian-refugee-immigration-fairness>.

¹¹ LRIF Policy Manual, *supra* note 7.

¹² *Liberian Refugee Immigration Fairness*, *supra* note 7.

¹³ Designation of Liberia for Temporary Protected Status, 79 Fed. Reg. 69,502, 69,502 (Nov. 11, 2014).

parties to the immigration benefit sought and who have direct personal knowledge of the event and circumstances. You must also explain why primary and secondary evidence are unavailable.

Importantly, when USCIS receives an initial application that contains acceptable secondary evidence (e.g., an expired Liberian passport), **we recommend that USCIS accept this evidence instead of issuing an RFE asking for an accompanying explanation.** The ongoing pandemic provides general grounds as to why Liberian nationals cannot generally submit valid passports and to RFE an application on the grounds that applicants must reiterate what USCIS already knows is inefficient and problematic. **Secondary evidence submitted initially with the application should be treated as sufficient prima facie and should not require an RFE.**

USCIS is also implementing problematic continuous presence requirements that are inconsistent with its policies in other, similar adjudications (e.g., DACA, Haitian Refugee Immigration Fairness Act (HRIFA), and NACARA). Out of the ten example RFEs we received, approximately seven include issues related to continuous presence (essentially all RFEs except 5, 6, and 9). This indicates that USCIS may be implementing a much higher evidentiary standard when it comes to LRIF applicants. We urge USCIS to take a measured and reasonable approach as to the amount of documentation an applicant must provide to establish continuous physical presence as was required for DACA applicants:

Q31: To prove my continuous residence in the United States since June 15, 2007, must I provide evidence documenting my presence for every day, or every month, of that period?

A31: To meet the continuous residence guideline, you must submit documentation that shows you have been living in the United States from June 15, 2007, up until the time of your request. You should provide documentation to account for as much of the period as reasonably possible, but there is no requirement that every day or month of that period be specifically accounted for through direct evidence.

It is helpful to USCIS if you can submit evidence of your residence during at least each year of the period. USCIS will review the documentation in its totality to determine whether it is more likely than not that you were continuously residing in the United States for the period since June 15, 2007. Gaps in the documentation as to certain periods may raise doubts as to your continued residence if, for example, the gaps are lengthy or the record otherwise indicates that you may have been outside the United States for a period of time that was not brief, casual or innocent.

If gaps in your documentation raise questions, USCIS may issue a Request for Evidence to allow you to submit additional documentation that supports your claimed continuous residence.

Affidavits may be submitted to explain a gap in the documentation demonstrating that you meet the five-year continuous residence requirement. If you submit affidavits related to the continuous residence requirement, you must submit two or more affidavits, sworn to or affirmed by people other than yourself who have direct personal knowledge of the events and circumstances during the period as to which there is a gap in the

documentation. Affidavits may only be used to explain gaps in your continuous residence; they cannot be used as evidence that you meet the entire five-year continuous residence requirement.¹⁴

In the alternative, USCIS may look to the standard set forth in the NACARA regulation:

By regulation, the Department is hereby providing that a NACARA applicant may demonstrate continuity of physical presence in the United States through the submission of one or more documents issued by any governmental or non-governmental authority. Such documentation must bear the name of the applicant, have been dated at the time it was issued, and bear the signature of the issuing authority. In some cases, a single document may suffice to establish continuity for the entire post-December 1, 1995, period, while in other cases the alien may need to submit a number of documents. For example, a college transcript or an employment record may show that an applicant attended school or worked in the United States throughout the entire post-December 1, 1995, period. On the other hand, an applicant would need to submit a number of monthly rent receipts or electric bills to establish the same continuity of presence. While the Department neither requires nor wants the applicant to submit documentation to show presence on every single day since December 1, 1995, there should be no significant chronological gaps in the documentation, either. **Generally, a gap of 3 months or less in documentation is not considered significant.** Furthermore, if the applicant is aware of documents already contained in his or her Immigration and Naturalization Service (Service) file that establish physical presence, he or she may merely list those documents, giving the type and date of the document. (emphasis added)¹⁵

We ask that the Ombudsman recommend USCIS implement reasonable continuous presence standards akin to that in DACA, HRIFA, and NACARA and only require a single piece of evidence for every six months or, at most, every quarter. Current and former DED and TPS holders should generally have a presumption of satisfying continuous presence requirements.

IV. USCIS Should Immediately Implement a Robust Outreach and Education Program to Reach as Many Potential Applicants as Possible Before the Deadline

There are approximately 10,300 individuals who are eligible for relief under LRIF and, as discussed above, USCIS' outreach, community, and stakeholder engagements have failed to fully reach this population—especially in light that only 2,000 individuals submitted applications¹⁶ The tardy release of the Policy Manual, ongoing global pandemic, and forthcoming deadline all make strong arguments for USCIS to engage in substantial and material forms of outreach to maximize

¹⁴ *Frequently Asked Questions*, U.S. Dep't of Homeland Sec., U.S. Cit. & Immigr. Servs. (Mar. 8, 2018), <https://www.uscis.gov/archive/frequently-asked-questions>.

¹⁵ Adjustment of Status for Certain Nationals of Nicaragua and Cuba, 63 Fed. Reg. 27,823, 27,823–34 (May 21, 1998).

¹⁶ Donald Kerwin & Mike Nicholson, *The Liberian Refugee Immigration Fairness Program: Estimates of the Potentially Eligible*, Ctr. for Migr. Studies (June 12, 2020), <https://cmsny.org/the-liberian-refugee-immigration-fairness-program-estimates-of-the-potentially-eligible/>.

the number of individuals who apply for relief. Thus, we urge the Ombudsman recommend USCIS:

- 1. Collaborate with the Liberian government to ensure that its consulates can educate and share information regarding secondary forms of evidence with Liberian nationals.**
- 2. Send mailed paper notices to all current and former Liberian DED and TPS holders sharing information regarding LRIF and the potential they may be available for this form of relief.**
- 3. Hold monthly stakeholder and community engagements to provide updates on application numbers, answer questions, and collect information regarding the efforts of non-profits to identify and assist individuals in applying.**
- 4. Transmit regular monthly communications through appropriate USCIS channels reminding stakeholders of the availability of LRIF and forthcoming deadline.**

V. Conclusion

LRIF is a historic and vital program enacted by Congress to stabilize deeply rooted families and establish a roadmap to citizenship for longtime Liberian nationals. We fear that, without intervention by the Ombudsman, the program will fail, not only contravening Congressional intent but also directly leading to dire human consequences, especially during these extraordinary times. Thank you for your consideration of the above. We are at your disposal to discuss these details further and to assist in any way possible. Please contact CLINIC's Advocacy Director, Jill Marie Bussey, at jbussey@cliniclegal.org or (240) 353-5208.

Sincerely,

A handwritten signature in blue ink that reads "Anna Marie Gallagher". The signature is written in a cursive, flowing style.

Anna Marie Gallagher
Executive Director

APPENDICES

APPENDIX - RFE 1

July 31, 2020

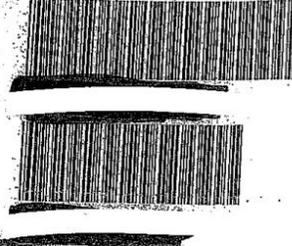
MONICA TAY BELEJ
CATHOLIC CHARITIES OF SE MI
76 WILLIAMS ST
PONTIAC, MI 48341

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

RE [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status



REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On April 17, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.
- Submit evidence that you were physically present in the United States for a continuous period from Nov. 20, 2014, until the date you filed your Form I-485 based on the Liberian Refugee Immigration Fairness (LRIF) law. This required period of physical presence will be considered "continuous" despite one or more absences from the United States for one or more periods that totaled 180 days or less. You may submit as many documents as necessary to establish continuous physical presence since Nov. 20, 2014. Examples include, but are not limited to:
 - A copy of passport pages with nonimmigrant visa, admission, or parole stamps;
 - Form I-94, Arrival/Departure Record;
 - Income tax records;
 - Mortgage deeds or leases;
 - Insurance premiums and policies;
 - Utility bills;

- Birth, marriage, and death certificates for immediate family members;
- Medical records;
- Bank records;
- School records;
- All types of receipts that contain identifying information about you;
- Census records;
- Social Security records;
- Employment records;
- Military records;
- Draft records;
- Car registrations; and
- Union membership records.

When You Need To Do It

You must send the requested information by mail to the address shown below by October 25, 2020.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Please include a copy of ALL pages of this letter with your response.

Submit your response with requested document(s), information, etc. to this address:

Regular Mail	Express Mail or Courier Deliveries
U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
 Director
 Officer: LA-0711

APPENDIX - RFE 2

July 31, 2020

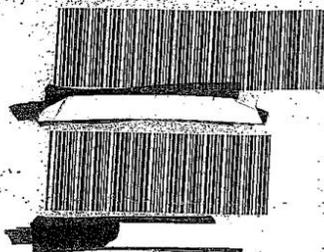
MONICA TAY BELEJ
CATHOLIC CHARITIES OF SOUTHEAS
76 WILLIAMS ST
PONTIAC, MI 48341

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status



REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On April 17, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.
- Submit evidence that you were physically present in the United States for a continuous period from Nov. 20, 2014, until the date you filed your Form I-485 based on the Liberian Refugee Immigration Fairness (LRIF) law. This required period of physical presence will be considered "continuous" despite one or more absences from the United States for one or more periods that totaled 180 days or less. You may submit as many documents as necessary to establish continuous physical presence since Nov. 20, 2014. Examples include, but are not limited to:
 - A copy of passport pages with nonimmigrant visa, admission, or parole stamps;
 - Form I-94, Arrival/Departure Record;
 - Income tax records;
 - Mortgage deeds or leases;
 - Insurance premiums and policies;
 - Utility bills;

- Birth, marriage, and death certificates for immediate family members;
- Medical records;
- Bank records;
- School records;
- All types of receipts that contain identifying information about you;
- Census records;
- Social Security records;
- Employment records;
- Military records;
- Draft records;
- Car registrations; and
- Union membership records.

When You Need To Do It

You must send the requested information by mail to the address shown below by October 25, 2020.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Please include a copy of ALL pages of this letter with your response.

Submit your response with requested document(s), information, etc. to this address:

Regular Mail	Express Mail or Courier Deliveries
U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
 Director
 Officer: LA-0711

APPENDIX - RFE 3

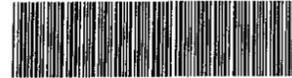
August 5, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

[REDACTED]
[REDACTED] SERVICES
[REDACTED]
[REDACTED]



RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status



REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On February 25, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.

When You Need To Do It

You must send the requested information by mail to the address shown below by September 19, 2020.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.



We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

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Regular Mail	Express Mail or Courier Deliveries
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PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
Director
Officer: LA-0481



APPENDIX - RFE 4

June 23, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



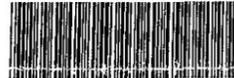
U.S. Citizenship
and Immigration
Services

[REDACTED]



[REDACTED]

I-485, Application to Register Permanent Residence or Adjust Status



[REDACTED]

REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On February 25, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of all arrivals to and departures from the United States before Nov. 20, 2014, until the date you filed this application. Provide any evidence showing residence in the United States from the date(s) you arrived and established residence until the date you filed this application. If we approve your application, the date of lawful permanent residence will be recorded as either the earliest arrival date in the United States from which you can establish you have been a resident in the United States, or Nov. 20, 2014 (if you cannot establish an earlier arrival date).

When You Need To Do It

You must send the requested information by mail to the address shown below by September 18, 2020.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.



If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

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PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
Director
Officer: LA-0481



APPENDIX - RFE 5

July 28, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

MARGARET WALSH RUDMANN
CATHOLIC CHARITIES ILS
201 E DIAMOND AVE FLR 3
GAITHERSBURG, MD 20877

[REDACTED]

RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status

[REDACTED]

REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On May 26, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.

When You Need To Do It

You must send the requested information by mail to the address shown below within 87 days.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Please include a copy of ALL pages of this letter with your response.

Submit your response with requested document(s), information, etc. to this address:

Regular Mail	Express Mail or Courier Deliveries
U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
Director
Officer: LA-1829

APPENDIX - RFE 6

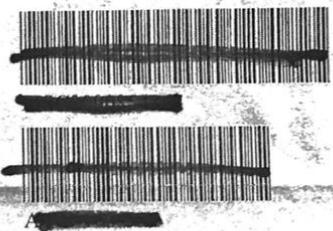
June 1, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

[REDACTED]



RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status

REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]:

Why We Are Writing You

On February 24, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence that you were physically present in the United States for a continuous period from Nov. 20, 2014, until the date you filed your Form I-485 based on the Liberian Refugee Immigration Fairness (LRIF) law. This required period of physical presence will be considered "continuous" despite one or more absences from the United States for one or more periods that totaled 180 days or less. You may submit as many documents as necessary to establish continuous physical presence since Nov. 20, 2014. Examples include, but are not limited

to:

- A copy of passport pages with nonimmigrant visa, admission, or parole stamps;
- Form I-94, Arrival/Departure Record;
- Income tax records;
- Mortgage deeds or leases;
- Insurance premiums and policies;
- Utility bills;
- Birth, marriage, and death certificates for immediate family members;
- Medical records;
- Bank records;
- School records;
- All types of receipts that contain identifying information about you;

- Census records;
- Social Security records;
- Employment records;
- Military records;
- Draft records;
- Car registrations; and
- Union membership records.

When You Need To Do It

You must send the requested information by mail to the address shown below by August 27, 2020.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Please include a copy of ALL pages of this letter with your response.

Submit your response with requested document(s), information, etc. to this address:

Regular Mail	Express Mail or Courier Deliveries
U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
 Director
 Officer: LA0832



APPENDIX - RFE 7

August 4, 2020

JILL HWANG
CATHOLIC CHARITIES
275 WEST BROADWAY
SOUTH BOSTON, MA 02127

RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services



[REDACTED]



[REDACTED]

REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]:

Why We Are Writing You

On February 14, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.
- Submit evidence of all arrivals to and departures from the United States before Nov. 20, 2014, until the date you filed this application. Provide any evidence showing residence in the United States from the date(s) you arrived and established residence until the date you filed this application. If we approve your application, the date of lawful permanent residence will be recorded as either the earliest arrival date in the United States from which you can establish you have been a resident in the United States, or Nov. 20, 2014 (if you cannot establish an earlier arrival date).

When You Need To Do It

You must send the requested information by mail to the address shown below within 87 days.



You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Please include a copy of ALL pages of this letter with your response.

Submit your response with requested document(s), information, etc. to this address:

Regular Mail	Express Mail or Courier Deliveries
U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
Director
Officer: LA-1829

APPENDIX - RFE 8

May 21, 2020

[REDACTED]

RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status



U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002

U.S. Citizenship
and Immigration
Services



REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On January 21, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.

When You Need To Do It

You must send the requested information by mail to the address shown below by August 16, 2020.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

APPENDIX - RFE 9

June 16, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

[REDACTED]



[REDACTED]



[REDACTED]

I-485, Application to Register Permanent Residence or Adjust Status

REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On February 25, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit a copy of the birth certificate or other primary birth record issued by the appropriate civil authority for the applicant, [REDACTED]. USCIS will only accept a long-form birth certificate which lists at least one parent. If the document is in a language other than English, you must submit a copy of the foreign language document and a completed English translation.

If the birth certificate or other primary birth record is not available, you must submit acceptable secondary evidence AND a letter from the government or other authority. Examples of acceptable secondary evidence may include, but is not limited to; church or school records, listing your parents' names and your date of birth; hospital records of your birth; or other official records indicating a country and record of birth.

Title 8 Code of Federal Regulations, Section 103.2(b)(2)(ii) states:

“Where a record does not exist, the applicant or petitioner must submit an original written statement on government letterhead establishing this from the relevant government or other authority. The statement must indicate the reason the record does not exist, and indicate whether similar records for the time and place are available.”

It must contain one of the following:

- A legible seal
- A legible stamp
- A signature with a title containing the words: secretary, registrar or births and deaths

If the document is in a language other than English, you must submit a copy of the foreign language document and a complete English translation. For more information on birth records, see visa reciprocity and civil documents at <https://travel.state.gov>.

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.
- Submit evidence that you were physically present in the United States for a continuous period from Nov. 20, 2014, until the date you filed your Form I-485 based on the Liberian Refugee Immigration Fairness (LRIF) law. This required period of physical presence will be considered "continuous" despite one or more absences from the United States for one or more periods that totaled 180 days or less. You may submit as many documents as necessary to establish continuous physical presence since Nov. 20, 2014. Examples include, but are not limited to:
 - A copy of passport pages with nonimmigrant visa, admission, or parole stamps;
 - Form I-94, Arrival/Departure Record;
 - Income tax records;
 - Mortgage deeds or leases;
 - Insurance premiums and policies;
 - Utility bills;
 - Birth, marriage, and death certificates for immediate family members;
 - Medical records;
 - Bank records;
 - School records;
 - All types of receipts that contain identifying information about you;
 - Census records;
 - Social Security records;
 - Employment records;
 - Military records;
 - Draft records;
 - Car registrations; and
 - Union membership records.

When You Need To Do It

You must send the requested information by mail to the address shown below within 87 days.

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.

We strongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Please include a copy of ALL pages of this letter with your response.

Submit your response with requested document(s), information, etc. to this address:

Regular Mail	Express Mail or Courier Deliveries
U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
Director
Officer: LA-1829

APPENDIX - RFE 10

June 15, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Benefits Center
P.O. Box 648004
Lee's Summit, MO 64002



U.S. Citizenship
and Immigration
Services

[REDACTED]
CATHOLIC SOCIAL SERVICES
227 N 18TH STREET
PHILADELPHIA, PA 19103



RE: [REDACTED]
I-485, Application to Register Permanent Residence or Adjust Status



REQUEST FOR EVIDENCE (FORM I-485)

Dear [REDACTED]

Why We Are Writing You

On February 24, 2020, you submitted your Form I-485. We are writing to inform you that we need more information from you to make a decision on your case. Please read this letter carefully and follow all of the instructions below.

What You Need To Do

You must provide the following information in order for us to make a final decision on your case. **Please include a copy of ALL pages of this letter with your response.**

- Submit evidence of Liberian nationality. Examples include, but are not limited to:
 - Unexpired Liberian passport; or
 - Liberian certificate of naturalization.

When You Need To Do It

You must send the requested information by mail to the address shown below by [REDACTED]

You must submit all of the requested evidence at one time. If you submit only part of the evidence, we will make a decision based on the evidence that you submit. We will not consider any evidence that is submitted after the due date. If you do not respond to this request by the date shown above, we will deny your case.

If you submit a document in any language other than English, you must provide: (1) a copy of the original document in its foreign language; and (2) a full English translation of the document. The translator must certify that the translation is complete and accurate, and that he or she is competent to translate from the foreign language to English.



ongly recommend you keep a copy of all documents that you submit to USCIS in response to this request.

Submit your response with requested document(s), information, etc. to this address:

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U.S. Department of Homeland Security	USCIS, Attention: Adjustment of Status
PO Box 648004	850 NW Chipman Rd
Lee's Summit, MO 64002	Lee's Summit, MO 64063

Please do not forget to include a copy of ALL pages of this letter with your response.

Sincerely,



Terri A. Robinson
Director
Officer: LA0122