

June 2, 2009

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Service
Vermont Service Center
75 Lower Welden Street
St. Albans, VT 05479

Re: PETITION FOR U NONIMMIGRANT STATUS

Applicant: Jane Doe

Dear Sir or Madam:

I am writing on behalf of my client Jane Doe. Ms. Doe's I-918 application for U-1 Nonimmigrant Status, along with supporting documentation, is enclosed.

As a child, Ms. Doe was the direct victim of abusive sexual contact; incest; rape; and sexual assault by her aunt's boyfriend. The New York City Administration for Children's Services ("ACS") investigated these crimes. Ms. Doe assisted ACS in the investigation of these crimes.

Ms. Doe Was the Victim of Three U-Qualifying Crimes

Ms. Doe is a native and citizen of Liberia. When she was six years old, her parents sent her on her own to the U.S. to live with her aunt. As the attached I-918 Supplement B shows, Ms. Doe was, from the time she was seven years old, the victim of abusive sexual conduct; domestic violence; incest; rape; and sexual assault at the hands of her aunt's live-in boyfriend. The Administration for Children's Services, Division of Child Protection, carried out an investigation of these crimes, which fall under New York Penal Law Section 130.35 (rape in the first degree); 130.75 (Course of sexual conduct against a child in the first degree), and 255.25 (Incest).

Ms. Doe Suffered Substantial Physical or Mental Abuse as a Result of the Qualifying Crimes

Ms. Doe was subjected to sexual abuse at the hands of an adult in her household when she was a young child. As she explains in her detailed declaration, she has been suffering the mental effects of this abuse ever since. She was extremely uncomfortable talking about what had happened to her when she was a child. She

retreated into herself for years after the abuse, and did not feel comfortable talking to anyone about what had happened to her. As she says “that stuff that happened with John shut me in, I was like a hermit, I didn’t already answer questions.” Doe Declaration, Ex A, ¶ 11.

Ms. Doe has also had a history of abusive relationships with men; she now believes that she got into abusive relationships because of the abuse she suffered as a child. Abraham Jones, the father of her daughter Lucy, beat and abused her so that she had to flee her home; she and Lucy lived in domestic violence shelters for several years, and Ms. Doe got an Order of Protection against him from Family Court in New York City. Ms. Doe says that “I realized that my abusive relationships with men were connected with what had happened to me as a child – that was the only thing I knew, that was the only way I knew to get someone to love me, just giving my body up. . . I realized that this was why I had been in bad relationships, what had happened when John abused me.” Doe Decl ¶ 18.

Ms. Doe is currently seeing a counselor to help her deal with the after-effects of the abuse she suffered as a child, and the domestic abuse she suffered as a young adult. Her counselor, a clinical Social Worker, has submitted a letter attesting to the lingering effects on Ms. Doe of the abuse she suffered as a child. She explains that the sexual abuse Ms. Doe was the victim of is extremely damaging, especially to a young child, and that Ms. Doe is still struggling to overcome the feelings of shame, isolation, and depression engendered by that abuse. Her counselor sees a direct connection between Ms. Doe’s abusive relationships with men as an adult, and the harm she suffered as a child. Strong Declaration, Ex. F, ¶¶ 3-8. Letters from counselors at the domestic violence shelters she has stayed in further confirm that she continues to suffer the after-effects of the crimes perpetrated on her as a child. Ramirez Letter, Ex. E, and Dray Letter, Ex. G.

Ms. Doe Was Helpful to Law Enforcement

The I-918B signed by the Administration for Children’s Services of New York attests to the fact that Ms. Doe was helpful to law enforcement in the investigation of the above-named crimes against her.

DOCUMENTS IN SUPPORT OF APPLICATION

In support of Ms. Doe’s application for U status, we enclose the following documents:

- G-28 signed by Ms. Doe
- I-918 signed by Ms. Doe
- I-918, Supplement B

- \$80.00 biometrics fee
- Two photographs of Ms. Doe for her Employment Authorization Document
- Exhibits in support of Ms. Doe's application:
 - A. Declaration of Jane Doe;
 - B. Liberian birth certificate of Jane Doe;
 - C. Liberian passport of Jane Doe;
 - D. Copy of I-94 of Jane Doe, showing admission to U.S. on August 3, 1992;
 - E. Letter from G. Ramirez, Specialist/Counselor at Urban Women's Safe Haven, dated January 12, 2007;
 - F. Letter from Letitia Strong, Clinical Social Worker at Safe Horizon, dated July 18, 2009;
 - G. Letter from Doreen Dray, Supervising Social Worker at Safe Horizon, dated April 13, 2008;
 - H. Temporary Order of Protection, Family Court of New York, ordering Abraham Jones to refrain from assault and other criminal offenses against Jane Doe and Lucy Jones, dated January 26, 2007.

If you have questions about this application, please contact me at (718) 268-1972 or at jguilfoyle@cliniclegal.org.

Sincerely,

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