



AMERICAN
IMMIGRATION
LAWYERS
ASSOCIATION

CENTER FOR
Gender & Refugee
STUDIES

September 23, 2014

The Honorable Judge Quynh Vu Bain
Immigration Court
1901 South Bell Street, Suite 200
Arlington, VA 22202

Re: Case Information Withheld

Letter of Amici Curiae, American Immigration Lawyers Association and the
Center for Gender & Refugee Studies

Dear Honorable Judge Bain:

In *Matter of A-R-C-G-*, 26 I&N Dec. 388 (BIA 2014), the Board of Immigration Appeals held that “married Guatemalan women who are unable to leave their relationship” is a legally cognizable social group on which asylum can be granted. In this case, the court is asked to apply *Matter of A-R-C-G-* to Ms. Respondent’s claim and determine if “married Honduran women who are unable to leave their relationship” satisfies the *A-R-C-G-* framework. The court has requested additional expert testimony to help it resolve this question.

I.

In this letter, the American Immigration Lawyers Association and the Center for Gender and Refugee Studies proffers an analysis of *A-R-C-G-* to assist the immigration court in applying the *A-R-C-G-* framework to this case.¹ Using the facts

¹ AILA and CGRS are particularly well suited to assist the court because we have a recognized expertise on asylum law and have an interest in fair and consistent application of the legal precedent established in *A-R-C-G-*. Between 2011 and 2012 the BIA asked AILA to file amicus briefs in *A-R-C-G-* and six other cases involving Central American respondents claiming asylum based on domestic violence from Guatemala, El Salvador, and Honduras to “specifically and comprehensively address the issue of whether domestic violence can, in some instances, form the basis of an asylum or withholding of removal claim.” CGRS has played a central role in the development of law and policy related to gender-based asylum claims. AILA and CGRS filed amicus briefs in *Matter of A-R-C-G-*. In *Matter of A-R-C-G-*, 26 I&N Dec. at 388, the BIA largely tracked the position of AILA and CGRS, recognizing these claims as valid bases for asylum protection. AILA and CGRS have appeared

here as illustrative of claims involving past persecution based on domestic violence, we explain that there are four questions that will guide the application of *Matter of A-R-C-G-*.

- A. Does the harm inflicted on a respondent constitute persecution?
- B. Does the record support the cognizability of a gender-defined social group of “Honduran married women who are unable to leave their relationship”?
- C. Was the persecution inflicted on account of a respondent’s membership in her gender-defined particular social group?
- D. At the time the persecution occurred, was the Honduran government unable or unwilling to protect the respondent?

If these questions are affirmative, the well-known regulations governing claims of past persecution are triggered. 8 C.F.R. § 1208.13(b)(1).²

II.

We address each of the questions below.³

before the BIA and the federal circuit courts numerous times over the years on important questions of asylum law.

² The government can rebut the past persecution presumption by showing changed circumstances or reasonable relocation alternatives. However, even if rebutted, a grant of humanitarian asylum may be appropriate if the asylum seeker establishes “compelling reasons for being unwilling or unable to return to the country arising out of the severity of the past persecution,” or “a reasonable possibility that he or she may suffer other serious harm upon removal to that country.” 8 C.F.R. § 1208.13(b)(1)(iii). The atrocious nature of harm suffered in many domestic violence cases (e.g., physical, sexual and psychological torment) and the circumstances women survivors may face upon removal to their home country (e.g., ostracism, homelessness, inability to find work, and lack of mental health services) may justify a grant of humanitarian asylum. *See A-R-C-G-*, 26 I&N Dec. at 395 (instructing that the immigration judge may consider humanitarian asylum if reached).

³ As a matter of long-standing practice of the Association, AILA takes no position on the merits of Ms. Respondent’s claim. We refer to Ms. Respondent’s claim as illustrative in explaining how *Matter of A-R-C-G-* ought to be implemented in the immigration courts.

A. Persecution

Does the physical, sexual, and psychological abuse suffered by a respondent at the hands of her husband rise to the level of persecution? This is the first question the immigration court must address. In making this determination, the record speaks for itself: Ms. Respondent testified that her husband, over the course of the two years before she escaped, raped her repeatedly at gun point, often shooting the gun in her direction and threatening to kill her. She also testified that he hit her with a broom, which caused her to require stitches and left a scar on her face and arm, and pushed her into barbed wire. Moreover, he regularly insulted her, calling her “stupid” and a “bitch.” In addressing persecution, the immigration judge must weigh each incident individually and cumulatively. *See, e.g., Ritonga v. Holder*, 633 F.3d 971, 975 (CA10 2011) (recognizing that “cumulative effects of multiple incidents may constitute persecution”); *Vatulev v. Ashcroft*, 354 F.3d 1207, 1210 (CA10 2003) (recognizing that nonphysical harm, such as threats, may constitute persecution); *Zubeda v. Ashcroft*, 333 F.3d 463, 472–73 (CA3 2003) (highlighting the psychologically “scarring effects” of rape and noting that rape has been “recognized under the law of nations as torture” and “can constitute sufficient persecution to support a claim for asylum”); *Hassan v. Gonzales*, 484 F.3d 513, 519 n.2 (CA8 2007) (recognizing that rape and other violence against women constitute persecution); *see also Matter of S-A-*, 22 I&N Dec. 1328, 1335 (BIA 2000) (recognizing domestic violence at the hands of the applicant’s father as persecution); U.N. High Commissioner for Refugees, Guidelines on International Protection: Gender-Related Persecution within the context of Article 1A(2) of the 1951 Convention and/or its 1967 Protocol relating to the Status of Refugees, ¶ 9, U.N. Doc. HCR/GIP/02/01 (May 7, 2002) (recognizing domestic violence against women as a form of persecution).

B. Protected Ground

Does the record support the cognizability of the social group defined by gender, nationality and relationship status, “Honduran married women who are unable to leave their relationship”? In *Matter of A-R-C-G-*, the BIA explained that the three key elements of social group formation – immutability, particularity, and social distinction – can be applied to women whose claims for protection are based on

domestic violence.⁴ These key elements are determined by reference to the social, legal and cultural context of the country in question and the respondent's particular experience. *See A-R-C-G-*, 26 I&N Dec. at 393; *see also Matter of M-E-V-G-*, 26 I&N Dec. 227, 244 (BIA 2014). In this case, the key elements support a finding of a social group in Honduras defined by gender, nationality and relationship status.⁵

1. Immutability

Immutability analysis focuses on whether the defining characteristics of the social group can or could change. For some characteristics, change “would be virtually impossible to do” because the defining characteristic is innate. *Matter of M-E-V-G-*, 26 I&N Dec. at 237. Other characteristics are immutable “because the basis of the affiliation is fundamental to the members’ identities or consciences” and the applicant should not be required to change it or cannot change it even if she wanted to. *Id.* at 237-38; *see also Matter of W-G-R-*, 26 I&N Dec. 208, 213 (BIA 2014) (“The critical requirement is that the defining characteristic of the group must be something that either cannot be changed or that the group members should not be required to change in order to avoid persecution.”).

Gender and nationality have been found on several occasions by the U.S. Courts of Appeals and the BIA to be immutable characteristics that may define a social group. *See, e.g., Cece v. Holder*, 773 F.3d 662 (CA7 2013) (en banc) (recognizing gender plus nationality as defining a social group); *Bah v. Mukasey*, 529 F.3d 99, 112 (CA2 2008) (same); *Mohammed v. Gonzales*, 400 F.3d 785, 797 (CA9 2005) (same); *Matter of Kasinga*, 21 I&N Dec. 357 (BIA 1996) (same); *Matter of Acosta*, 19 I&N Dec. 211 (BIA 1985) (recognizing sex as an innate characteristic). The same analysis should be applied by the immigration court in this case.

With respect to marital status, a characteristic that further defines Ms. Respondent's social group, the BIA explained in *A-R-C-G-* that it may be immutable “where the individual is unable to leave the relationship.” 26 I&N Dec. at 393. To

⁴ By arguing for clear and consistent application of the social distinction and particularity requirements herein, AILA does not concede that these requirements are a reasonable interpretation of the statute entitled to deference by the federal courts.

⁵ The record also supports alternative social groups, for example, defined by gender and nationality alone, but these groups are not discussed in detail here.

determine whether the individual (and group members) can leave a relationship, the immigration court should consider the societal and cultural context of Honduras and the personal experience of the applicant. *Id.*; see also DHS's Supplemental Brief, *Matter of L-R-* (BIA Apr. 13, 2009) (arguing that marital status may be immutable where economic, social, physical or other constraints make it so and/or where the abuser would not recognize separation or divorce as ending the relationship).

This record contains the type of evidence the BIA has held the immigration court should rely on in evaluating immutability of non-innate characteristics such as Ms. Respondent's own experience as well as objective, country information. For example, Ms. Respondent testified that she attempted to leave her husband after the abuse started by moving to another city in Honduras. However, her husband tracked her down and insulted and raped her. Ms. Respondent testified that her husband believed he had the "right" to have sexual relations with her as he pleased, demonstrating that he did not recognize the end of their relationship even if physically separated because the relationship existed on his terms. Moreover, further demonstrating the immutability of their marital status, Ms. Respondent testified that when her husband found that she was planning to go to the United States, he said that if she took their daughters, he would kill her. He also threatened to kill her if she ever called the police, and that the police would not help even if she reported his abuse. Her church, Ms. Respondent testified, does not support divorce – though, even if she had sought and obtained divorce, the record shows that her husband would not have recognized the divorce as ending his right to abuse her. Ms. Respondent's experience as a married woman is supported by the ample country conditions in the record demonstrating the physical, economic and social factors that constrain Honduran women from being able to leave domestic relationships. See, e.g., Exh. 2, Country Conditions Evidence; Exh. 3, Declaration of Claudia Hermannsdorfer.

2. Particularity

The BIA has explained that the particularity requirement chiefly addresses the question of "delineation" or the need to place "outer limits" on the definition of a social group. *W-G-R-*, 26 I&N Dec. at 214. The analysis focuses on whether a group is "defined by characteristics that provide a clear bench mark for determining who falls within the group," and whether "the terms used to describe the group have commonly accepted definitions in the society of which the group is a part." *M-E-V-G-*, 26 I&N Dec. at 239.

The BIA's particularity analysis in *A-R-C-G-* should apply in case's like Ms. Respondent's, given the similar social group presented that is defined by the terms "women," "married," and "unable to leave the relationship." 26 I&N Dec. at 393. The BIA held that "[i]n some circumstances, the terms can combine to create a group with discrete and definable boundaries." *Id.* For example, the BIA pointed to a 2008 U.S. State Department report documenting sexual violence against women as a widespread social problem in Guatemala. *Id.* (citing Bureau of Human Rights, Democracy, and Labor, U.S. Dep't of State, Guatemala Country Reports on Human Rights Practices—2008 (Feb. 25, 2009)). The BIA highlighted the report as evidence of Guatemalan "societal expectations about gender and subordination, as well as legal constraints regarding divorce and separation." *Id.* This documentation of social expectations and constraints showed that the term "unable to leave the relationship" would also have a commonly accepted definition with respect to married women in Guatemalan society. *Id.* The BIA also noted that the applicant's personal testimony about her own unsuccessful efforts to leave her abusive domestic relationship should be counted as "significant" additional evidence about sociological conditions in Guatemala that are also relevant to the analysis of particularity. *Id.*

Here, "married Honduran women who are unable to leave their relationship" consists of terms with commonly accepted definitions in Honduran society. There can be little question "married" and "women," have broadly accepted meanings in Honduras and that, here too as in *A-R-C-G-*, these terms combine with "unable to leave the relationship" to form a social group with particularity when the available sociological evidence is considered. *See, e.g.,* Exh. 2, Country Conditions Evidence (providing background on subordination of women in Honduras and high rates of violence perpetrated against them); Exh. 3, Hermannsdorfer Decl., at 10 (stating that "Honduran men believe that they can abuse and rape their wives with impunity because these women 'belong' to them and, like pieces of property, the men can do what they wish with a woman").

Seeking police protection (or not) is a question of fact that relates to particularity, because it can show that within the relevant society there is a clear sense as to who is a member of the group. However, respondents like Ms. Respondent are *not* required to seek police protection in order to establish particularity. When the evidence in the record explains that the police and others in the justice system regularly dismiss married women's complaints as private matters and exhibit bias and discrimination against women who are victims of gender-based violence and

domestic violence in particular, then seeking police protection only to have it refused is superfluous, unnecessary evidence.⁶ See, e.g., Exh. 3, Hermannsdorfer Decl., at 11 (noting that “police believe that women are second-class citizens who must conform to their partners’ or parents’ commands,” that “Honduran police ignore threats made against women, treating them as nothing more than the product of over-excited emotions,” and that “the authorities consider violence against women to be unimportant”). The court can fill the gap in the record with country conditions evidence and expert testimony regarding police response in similar circumstances to evaluate how the police would have responded if the applicant had reported.

3. Social Distinction

The singular question in assessing whether a particular group is socially distinct is: is the group perceived as a group by society? See *Matter of M-E-V-G-*, 26 I&N Dec. at 240. In other words, “[d]oes the society make meaningful distinctions based on the common immutable characteristics” of the defined group? See *Matter of A-R-C-G-*, 26 I&N Dec. at 394. in its 2009 brief, DHS took the position that social visibility can be shown by proof of differential or worse treatment of group members, which is supported by the BIA’s recent social group decisions).

The BIA has recognized that a range of evidence can be consulted to make this determination, including ample background country conditions evidence pointing to high rates of domestic violence in the country and the culture of “machismo.” *Id.* Distinction can be shown by proof of differential or worse treatment of group members. See, e.g., DHS Supplemental Brief, *Matter of L-R-*, *supra*; *Matter of M-E-V-G-*, 26 I&N Dec. 243, 238 n.12 (noting that “upon their maltreatment, it is possible that [people] would experience a sense of ‘group,’” though “self-awareness is not a requirement for the group’s existence”).

Like the record evidence in *A-R-C-G-* regarding Guatemalan society, the evidence submitted in this case supports a finding of distinction given high rates of violence against women in Honduras, the machismo that permeates Honduran culture, and the differential treatment women receive in the form of lack of protection, for

⁶ It would be illogical to require applicants to report persecution in order to establish particularity of a particular social group, when applicants are not required to report persecution in order to prove that the state is unable or unwilling to protect them.

example. *See, e.g.*, Exh. 2, Tab 6A, 2013 Department of State Report (stating that “[v]iolence against women and impunity for perpetrators continued to be a serious problem” and that specifically “[d]omestic violence continued to be widespread”); Tab 6G, Report of the UN Special Rapporteur on Violence against Women (expressing concern for the “high levels of domestic violence, femicide and sexual violence” against women in Honduras); Exh. 3, Hermannsdorfer Decl., at 10, (stating that “[t]he culture of *machismo* pervades Honduras” and “teaches that women are property of their intimate partners or fathers, that women are second-class citizens, and that women are to be dealt with as seen fit by the masculine sectors of society”).

The legal context in Honduras is also an excellent example of how a society makes distinctions by enacting laws, rules, or programs aimed at members of the defined social group and, further, whether (or how) those laws are enforced. *See A-R-C-G*, 26 I&N Dec. at 394 (recognizing whether “the country has criminal laws designed to protect domestic abuse victims” and whether “those laws are effectively enforced” as evidence of distinction); *see also* *Henriquez-Rivas v. Holder*, 707 F.3d 1081, 1092 (CA9 2013) (en banc) (noting that “[i]t is difficult to imagine better evidence that a society recognizes a particular class of individuals as uniquely vulnerable, because of their group perception by [their persecutors], than that a special . . . protection law has been tailored to its characteristics”). In 1997, Honduras enacted the Law against Domestic Violence that “establishes a mechanism for a battered woman to obtain a protective order against an abuser.” Exh. 3, Hermannsdorfer Decl., at 20. The Criminal Code also includes an article on intrafamilial violence which “create[s] criminal penalties for violence or assault carried out against persons in a familial relationship” like marriage. *Id.* at 25. Most recently, Honduras enacted a law categorizing femicide (the gender-motivated killing of women) as a crime under the Penal Code. *See, e.g.*, Exh. 2, Tab 6G, Report of the UN Special Rapporteur on Violence against Women. Many killings of women in Honduras have been attributed to killings by intimate partners including husbands. *See, e.g.*, Exh. 2, Tabs 6D and 6E, Canadian Immigration and Refugee Board Reports (citing to studies of high percentage of crimes against women as the result of family violence); *see also* Exh. 3, Hermannsdorfer Decl., at 14 (“the leading cause of femicides in Honduras is the widespread prevalence of domestic or intrafamilial violence”).

C. Nexus

Next, the immigration court asks whether the persecution was inflicted on account of her membership in the particular social group. The applicant need only show

that her membership in the protected group was “one central reason” for the persecution and this can be shown through the submission of direct or circumstantial evidence. *See* 8 U.S.C. § 1158(b)(1)(B)(i); *INS v. Elias-Zacarias*, 502 U.S. 478 (2002); Asylum and Withholding Definitions, 65 Fed. Reg. 76588, Preamble (proposed Dec. 7, 2000) (hereafter Proposed Regulations).

Direct evidence of the persecutor’s motives may include comments the abuser made about the victim’s status or inability to leave the relationship. It could also include comments that he has the right to abuse her because of their relationship and her status in it. For example, in this case, direct evidence would include Ms. Respondent’s testimony that her husband began to abuse her after she confronted him regarding an affair with another woman. She also testified that he called her a “bitch” and asserted control over her, threatening to kill her if she left, and that he thought it was his right to have sex with her whenever he wanted as his wife.

Circumstantial evidence may include country conditions information regarding societal acceptance of domestic violence, impunity for domestic violence, and lack of protection for victims of domestic violence as well as acceptance of and impunity for violence against women in general. *See, e.g.*, Proposed Regulations at 76,593 (evidence of “patterns of violence [that] are (1) supported by the legal system or social norms in the country in question, and (2) reflect a prevalent belief within society, or within relevant segments of society” is relevant to determining whether the persecution is “on account of” a protected characteristic); Asylum Officer Basic Training Course, *Female Asylum Applicants and Gender-Related Claims*, 26 (Mar. 12, 2009) (hereafter AOBTC, *Female Asylum Applicants*) (same). The record evidence here, as described above, shows acceptance in Honduran society of domestic violence that may embolden an abuser, like Ms. Respondent’s husband, and reinforce his belief that abuse of women within a marital relationship is acceptable and a central reason for persecution. *See, e.g.*, Exh. 2, Country Conditions Evidence (demonstrating increasingly high rates of domestic violence and other violence against women that is committed with impunity); Exh. 3, Hermannsdorfer Decl., at 10 (noting that “[d]omestic violence is accepted and common throughout Honduras” because of beliefs of Honduran men “that they can abuse and rape their wives with impunity because these women ‘belong’ to them” and that “[f]ar too often, the direct result of this societal acceptance of violence against women is murder”); *see also* Exh. 2, Declaration of Nancy K. D. Lemon, at 3 (stating that “[g]ender is one – if not *the* – primary motivating factor for domestic violence,” which is supported by “[s]tatistics, comparative cross-cultural studies of domestic violence, and behaviors exhibited by male batterers [that] show that

disparities between the socially or culturally constructed roles assigned to women and those assigned to men are at the root of domestic violence”).

D. Unable or Unwilling

At the time the persecution occurred, was the Honduran government unable or unwilling to protect the respondent?

It is basic asylum law that an applicant qualifies for relief if she is a victim of persecution inflicted by non-state actors who the government is either “unable or unwilling to control.” See, e.g., *Matter of McMullen*, 17 I&N Dec 542, 544 (BIA 1980) (emphasis added); *Batalova v. Ashcroft*, 355 F.3d 1246, 1253 (CA10 2004). In *A-R-C-G-* the BIA affirms this same test applies to women who are victims of domestic violence amounting to persecution. 26 I&N Dec. at 395. In other words, an otherwise qualified applicant like Ms. Respondent who has established past persecution on account of a protected ground, and shows “the Government was unable or unwilling to control her husband,” is entitled to a rebuttable presumption that she has a well-founded fear of future persecution in Honduras. *Id.*

The correct test for the unable or unwilling requirement is whether a State takes measures that reduce the risk of persecution to below the well-founded fear threshold (i.e., 1 in 10 chance of persecution). See, e.g., AOBTC, Female Asylum Applicants, at 25; see also Proposed Regulations (asking whether the government takes reasonable steps to control the infliction of harm or suffering and whether applicant has reasonable access to the existing state protection). Although whether a victim reported her abuse to government authorities and the ensuing response may be relevant and considered by the immigration judge, the BIA has clearly held that an applicant is not required to report her abuse to establish the inability or unwillingness of her government to control her abuser. In *Matter of S-A-*, the Board held that a woman who faced severe domestic abuse at the hands of her father was entitled to asylum regardless of the fact she did not approach the Moroccan police, where the available country conditions evidence reflected that few women make such reports “because the judicial procedure is skewed against them,” and that “in Moroccan society, such action would not only be unproductive but potentially dangerous.” 22 I. & N. Dec. at 1332-33. The DHS and federal courts agree that reporting is not required if it would be futile or potentially dangerous.⁷

⁷ See AOBTC, Female Asylum Applicants, at 25 (“[A]n applicant may establish that state protection is unavailable even when she did not actually seek protection. For

Matter of S-A- and the Courts of Appeals instruct that in cases like that of Ms. Respondent, *for the sake of the applicant's safety* the “unable and unwilling to control requirement” can *and should* be established with alternative evidence of country conditions. Just as in *A-R-C-G-*, it is evident here that reporting abuse to ineffective or indifferent police carries a genuine risk of escalating, potentially fatal retaliatory abuse. 26 I&N Dec. at 389 (acknowledging the applicant’s credible testimony that her husband, in addition to subjecting her to “repugnant” abuse, “threatened respondent with death” if she called the police). Here, Ms. Respondent testified that she did not report her husband’s abuse to the police because she feared he would make good on his threats to kill her for doing so and her belief that the police would do nothing to protect her. The country conditions in the record are striking in their uniformity that it would have been futile for an applicant like Ms. Respondent to report the violence because police rarely respond and even if they do respond, the response does not lead to protection, but rather, places women in more danger for retaliation from her abuser as well as mistreatment or discrimination by the very authorities there to protect. *See, e.g.*, Exh. 2, Tab 6G, Report of the UN Special Rapporteur on Violence against Women (calling on the government “to address the culture of widespread impunity for crimes against women and girls” and citing reports of a “95 percent impunity rate for sexual violence and femicide crimes”); Exh. 3, Hermannsdorfer Decl., at 15 (“In Honduras, where law enforcement authorities do not interject themselves into the home and the culture approves the subjugation of women, domestic violence too often escalates until the woman ends up murdered by her partner.”).

example, the evidence may indicate that the applicant would not have received assistance if she had sought it ... [or] that seeking protection would have placed an applicant at even greater risk of persecution.”); *see also, e.g.*, *Ornelas-Chavez v. Gonzales*, 458 F.3d 1052, 1058 (CA9 2006) (noting there is nothing in the Refugee Act or implementing regulations requiring that an applicant seeking relief based on private persecution must have reported that persecution to the authorities); *Fiadjoe v. Att’y Gen.*, 411 F.3d 135, 161-62 (CA3 2005) (reversing the BIA’s denial of asylum where the record indicated it would have been futile for applicant to report abuse to the police); *Lopez v. Att’y Gen.*, 504 F.3d 1341, 1345 (CA11 2007) (holding that an applicant need not have reported persecution to the authorities if she “convincingly demonstrates that those authorities would have been unable or unwilling to protect her, and for that reason she could not rely on them”).

III.

The BIA's decision in *Matter of A-R-C-G-* provides a framework for addressing claims of asylum where the persecution is based on domestic violence. As we illustrated and explained using Ms. Respondent's case as an example, the application of the *A-R-C-G-* framework to past persecution claims is a straightforward matter. When properly applied, it is plain that women fleeing persecution based on domestic violence at the hands of their intimate partners can be eligible for asylum and where the record supports it, should be found to qualify for protection.

Respectfully submitted,

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