



*Submitted via USCIS online portal*

USCIS Chicago Asylum Office  
**ATTN: OAR/OAW**  
181 W. Madison St. Unit 30000  
Chicago IL, 60602

RE: I-589 Package Submission  
**Principal Applicant:** M [REDACTED] (#A2 [REDACTED])

Derivatives/Riders: [REDACTED]

Dear Officer:

On behalf of himself and derivatives, the above-named principal applicant submits his I-589 form, and attendant G-28 form identifying the undersigned as counsel, through USCIS's online filing system. In support of that application, please find further attached the following materials, organized pursuant to USCIS's online submission categories:

**A. "Cover Letter"**

- This cover letter

**B. "Written Statement"**

- Sworn declaration by principal applicant in support of asylum application

**C. "Specific Claim of Eligibility"**

- Letter from Taliban threatening Mr. [REDACTED] because of his work supporting U.S. and NATO's goals while employed by Supreme Group in Afghanistan WITH translation AND certificate of translation
- Employment letter from [REDACTED] Group
- [REDACTED]
- Employment certificate from contractor [REDACTED]



- Corroborating declaration by principal applicant's U.S. Citizen brother, A [REDACTED], who previously was employed by the U.S. embassy in Afghanistan
- A [REDACTED]'s Minnesota Driver's License

#### **D. "Personal Identification"**

- Complete copy of principal applicant's passport
- Principal applicant's I-94 indicating OAR Parole status through [REDACTED], 2023
- Copy of principal applicant's EAD
- Copy of principal applicant's social security card
- Copy of principal applicant's Afghanistan ID ("Tazkira")

#### **E. "Family Identification"**

- Letter from United States Department of Defense identifying family unit relationships and indicating [REDACTED] was personally at risk.

##### **E.1: Dependent: D [REDACTED]**

- D [REDACTED]'s I-94 (demonstrating OAR parole status)
- Copy of [REDACTED]'s EAD
- Copy of [REDACTED] Social Security Card
- Copy of [REDACTED] Tazkira

##### **E.2: Dependent: F [REDACTED]**

- F [REDACTED]'s I-94 (demonstrating OAR parole status)
- Copy of F [REDACTED]'s EAD
- Copy of F [REDACTED]'s Social Security Card
- Copy of F [REDACTED]'s Tazkira

##### **E.3: Dependent: F [REDACTED] I [REDACTED]**

- [REDACTED]'s I-94 (demonstrating OAR parole status)
- Copy of [REDACTED]'s EAD
- Copy of F [REDACTED] Social Security Card
- Copy of F [REDACTED] Tazkira

#### **F. "General Country Conditions"**

- Additional supporting documents WITH Index

#### **G. "Criminal History"**

- No documents

#### **H. "Additional Information"**

- Clarifications to online I-589 form.

Additionally, M [REDACTED], through undersigned counsel, averrs the following:

**In addition to suffering past persecution and having a well-founded fear of future persecution on account of his political opinions (and those imputed to him) in support of a free and democratic Afghanistan (such his support for the U.S. and NATO, manifested in his past work for companies that facilitated NATO goals in Afghanistan), and his support for the Islamic Republic of Afghanistan), and his on account of his non-fundamentalist religious faith, Mr. [REDACTED] suffered past persecution and faces a reasonable possibility of future persecution on account of membership in particular social groups including, *inter alia*: (1) former employees of U.S. contractors in Afghanistan; (2) former employees of [REDACTED]; (3) immediate relatives of [REDACTED];<sup>1</sup> (4) immediate relatives of [REDACTED]**

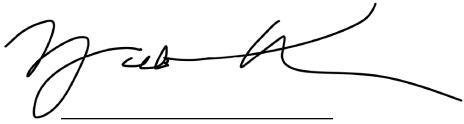
When considering a refugee's explicitly articulated particular social groups in the course of an adjudication, "immigration adjudicators have an affirmative duty to assist and work with applicants to ensure that asylum... is granted to those who qualify for such protection based on their individual circumstances." *Quintero v. Garland*, 998 F.3d 612, 626 (4th Cir. 2021).

The nexus to persecution, and cognizability, of each of the above protected grounds, is demonstrated by Mr. [REDACTED] testimony, record evidence, and precedent.<sup>2</sup>

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<sup>1</sup> See, e.g., *Diaz de Gomez v. Wilkinson*, 987 F.3d 359, 363–64 (4th Cir. 2021) ("[W]e have held that a person's nuclear family qualifies as a protected particular social group . . . . [I]mportantly, [an applicant is] not required to prove that her family ties were 'the central reason or even a dominant central reason' for the persecution, but only needed to show that her family membership was 'more than an incidental, tangential, superficial, or subordinate reason.'" (cleaned up) (emphasis original); *Gonzalez Ruano v. Barr*, 922 F.3d 346, 353 (7th Cir. 2019) (Recognizing a social group comprised of the applicant's "wife's immediate family" was cognizable) ("[W]e and other circuits have recognized that membership in a nuclear family can satisfy the social group requirement."); *Rivas v. Sessions*, 899 F.3d 537, 542 (8th Cir. 2018) ("Members of an immediate family may constitute a particular social group." (Quoting *Matter of L-E-A-*, 27 I. & N. Dec. 40, 42 (BIA 2017) ('Immediate relatives of X' PSG recognized as cognizable))).

<sup>2</sup> See *Cece v. Holder*, 733 F.3d 662, 669 (7th Cir. 2013) (*en banc*) (Adopting the *Acosta* test defining a cognizable PSG as a group a persons united by a shared, immutable characteristic someone cannot or should not have to change); *id.* at 670 ("Sometimes the characteristic is immutable because a shared past experience or status has imparted some knowledge or labeling that cannot be undone").



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Date