***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:** **xxx XXX** (#AXXXXXXXXX)

Derivatives/Riders: xxx XXX (#AXXXXXXXXX)

 xx XXX (#AXXXXXXXXX)

 xx XXX (#AXXXXXXXXX)

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”**

* XXX
* XXX

**D. “Personal Identification”**

* Complete copy of principal applicant’s passport
* Principal applicant’s I-94 indicating XXX status through XXXXXX, 202X
* XX

**E. “Family Identification”**

 **E.1: Dependent: XXX XXX**

* XXX XXX’s I-94 (demonstrating XXX status)
* XXXXXX

**E.2: Dependent: XXX XXX**

* XXX XXX’s I-94 (demonstrating XXX status)
* XXXX

**E.3: Dependent: XXX XXXX**

* XXX XXXX’s I-94 (demonstrating XXX status)
* XXX

**F. “General Country Conditions”**

* Additional supporting documents WITH Index

**G. “Criminal History”**

* No documents

**H. “Additional Information”**

* Clarifications to online I-589 form.

Additionally, XXX, through undersigned counsel, averrs the following:

COVER LETTER TEXT

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 XXX XXX’s testimony, record evidence, and precedent.[[1]](#footnote-1)

XXX, 20XX

[[attorney name]] Date

Applicant’s Attorney

[Address]]

1. *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”). [↑](#footnote-ref-1)