



## APPEALING ASYLUM DENIALS AFTER *MATTER OF A-B* AUGUST 23, 2018




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## INTRODUCTIONS

- Rena Cutlip-Mason
  - Tahirih Chief of Programs
- Julie Carpenter
  - Tahirih Senior Litigation Counsel
- Lynn Pearson
  - Tahirih Atlanta Staff Attorney
- Hillary Scholten
  - Michigan Immigrant Rights Center Staff Attorney and former BIA Staff Attorney




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## LEARNING OBJECTIVES

- UNDERSTANDING THE APPELLATE STRUCTURE FOR IMMIGRATION CASES
- PLANNING AHEAD FOR POSSIBLE APPEAL
- EFFECTIVE BRIEFING BEFORE THE BOARD OF IMMIGRATION APPEALS
- APPEALING TO THE FEDERAL CIRCUIT COURT




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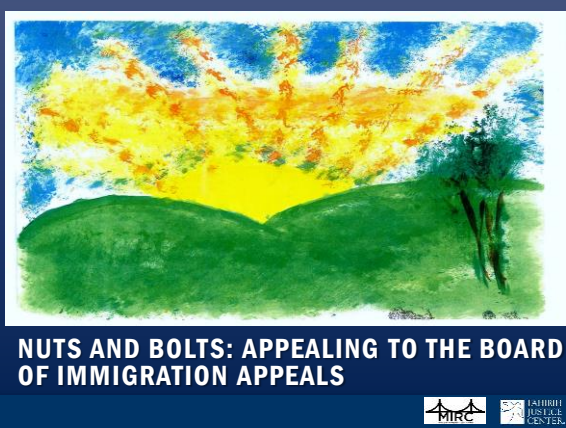
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## FILING AN APPEAL WITH THE BIA

- If IJ denies asylum claim, you will need to file an appeal in Board of Immigration Appeals, the highest administrative immigration court
- Pointers for making sure your appeal is properly and timely filed
- BIA Practice Manual
  - included in webinar materials & available online




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## PLANNING AHEAD FOR APPEAL

- Make your record before immigration judge
  - ICYMI Tahirih Webinar: Presenting your Case and Making your Record in Court
- Articulate all your particular social groups
  - W-Y-C- & H-O-B-, 27 I&N Dec.189 (BIA 2018)
- Take notes throughout hearing, especially oral rulings
- Think ahead to how you might frame appellate issues
- If denied, motion for reconsideration not required before appeal




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## NO MAILBOX RULE! NO E-FILE!

- ALL filings must be received at the BIA in Falls Church, VA by the due date.
- Use a delivery service that provides tracking/proof of delivery.
- Same-day courier services in case of emergency.
- E-filing cometh...someday...




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## NOTICE OF APPEAL

- Must be received 30 days after decision
  - If oral decision, 30 days from date of hearing
  - If written decision, 30 days from date of the order
- Form EOIR-26 Notice of Appeal from a Decision of an Immigration Judge
- Form EOIR-27 & Filing Fee (or fee waiver)
- EOIR-26 Question 6: "Please state the reason(s) for this appeal...You are not limited to the space provided below..."

**!** WARNING: You must clearly explain the specific facts and law on which you base your appeal of the Immigration Judge's decision. The Board may summarily dismiss your appeal if it cannot tell from this Notice of Appeal, or any statements attached to this Notice of Appeal, why you are appealing.

- Need not be long and detailed, just sufficiently articulate the claims you will be raising in your brief.




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## NOTICE OF APPEAL

6. State in detail the reason(s) for this appeal. Please refer to the General Instructions at item F for further guidance. You are not limited to the space provided below; use more sheets of paper if necessary. Write your name(s) and "A" number(s) on every sheet.

Ms. [REDACTED] is seeking to appeal the Immigration Judge's decision based on errors of law as well as mixed errors of law and fact. The Immigration Judge erred in requiring corroborating evidence and not providing Ms. [REDACTED] with further opportunity to provide corroboration, especially given that there were technical issues in obtaining testimony from Ms. [REDACTED]'s mother in [REDACTED]. While the Immigration Judge found Ms. [REDACTED] suffered past persecution based on sexual assault, the Immigration Judge erred in finding that death threats by her neighbor that were accompanied by attacks on Ms. [REDACTED]'s family members and attempts to prevent religious worship at Ms. [REDACTED]'s home was not sufficient to meet the standard for past persecution. The Immigration Judge also erred in finding that there was no nexus for the particular social group of "family members of [REDACTED]" and was wrong in deciding that religion was not a motivation given the nature of persecution suffered and threats associated with worship. The Immigration Judge also erred in finding that [REDACTED] women without male protection was not a particular social group because Ms. [REDACTED] could have gotten married or hired male protection and that she did not have a reasonable fear of future persecution. The Immigration Judge was incorrect in finding that the [REDACTED] government met its obligation to protect Ms. [REDACTED]. Furthermore, the Immigration Judge erred in applying the standard and burden for reasonable internal relocation.

(Attach additional sheets if necessary)




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## NOTICE OF APPEAL

- Form EOIR-26: Questions 7 & 8

7. Do you desire oral argument before the Board of Immigration Appeals? ☒ Yes ☐ No
8. Do you intend to file a separate written brief or statement after filing this Notice of Appeal? ☒ Yes ☐ No

**WARNING:** If you mark "Yes" in item #7, you should also include in your statement above why you believe your case warrants review by a three-member panel. The Board ordinarily will not grant a request for oral argument unless you also file a brief.

If you mark "Yes" in item #8, you will be expected to file a written brief or statement after you receive a briefing schedule from the Board. The Board may summarily dismiss your appeal if you do not file a brief or statement within the time set in the briefing schedule.




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## NOTICE OF APPEAL

- Three-judge panel needed to reverse IJ!
- Grounds for three-judge panel VERY broad:
  - The need to settle inconsistencies among the rulings of different immigration judges
  - The need to establish a precedent construing the meaning of laws, regulations, or procedures
  - The need to review a decision by an Immigration Judge or DHS that is **not in conformity with the law or with applicable precedents**
  - The need to resolve a case or controversy of major national import
  - The need to review a **clearly erroneous factual determination by an Immigration Judge**
  - The need to reverse the decision of an Immigration Judge or DHS in a final order, other than nondiscretionary dispositions.
- More important to argue for in brief than NOA




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## APPEAL BRIEF

- Briefing Schedule
  - Must be received 21 days from date of briefing schedule notice. In non-detained cases, DHS has 21 days from your filing date.
  - Notice will accompany the transcript
- Extensions
  - BIA policy to grant one 21-day extension if "requested in a timely fashion."
  - Must be requested by existing due date
  - BIA policy NOT to grant additional extensions
- Reply Brief
  - Must file a motion requesting authorization and explaining "surprise" in DHS brief




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## APPEAL BRIEF

- Approximately 25 pages
- One copy to BIA, one to DHS (no appendix, TOA, TOC)
- Lots of Style Rules—refer to manual or use sample brief
- Recommended Content:
  - A concise statement of facts and procedural history of the case
  - A statement of issues presented for review
  - The standard of review
  - A summary of the argument
  - The argument
  - A short conclusion stating the precise relief or remedy sought




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## MOTIONS & OTHER PLEADINGS

- Motion to Remand/Reopen
  - Mechanisms for presenting new evidence
  - *Matter of Coelho*, 20 I. & N. Dec. 464 (BIA 1992)
  - Must be material, not previously available, outcome determinative
  - If granted, jurisdiction reverts to the IJ
  - Remand can be filed anytime during pendency; Reopen within 90 days of decision
- Motion to Expedite
  - Must show irreparable harm or other good cause
- Motion to Reconsider
  - For errors of law or fact or change in the law
  - Must be filed within 30 days of decision
- Amicus Briefs
  - No special permission, same rules/deadline as main Brief
  - Amici must file an EOIR-27 notice of appearance.




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## OTHER RESOURCES

- Consult with your mentor attorney
- Familiarize yourself BIA Practice Manual
- Contact the BIA
  - Automated Case Info: 800-898-7180
  - Clerk's Office: 703-605-1007
  - Emergency Stay Line: 703-306-0093
  - Website: <https://www.justice.gov/eoir/board-of-immigration-appeals>
  - ALL Filings:
    - Board of Immigration Appeals
    - Office of the Chief Clerk
    - 5107 Leesburg Pike, Suite 2000
    - Falls Church, VA 22041




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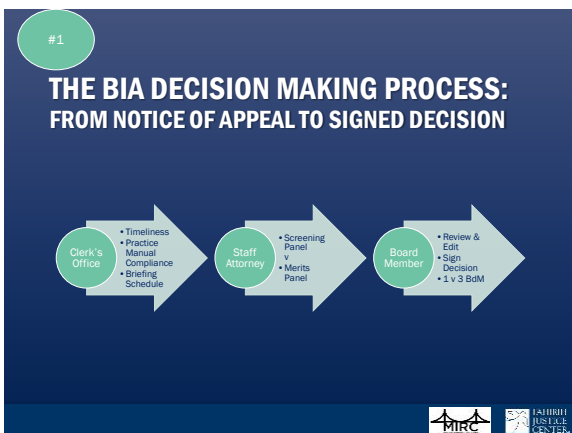
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#1

## WRITING FOR THE BIA

- Clear, direct statements of *relevant facts*
- Clear, direct statements of *relevant law*
  - DO NOT use overly long statements of basic legal underpinnings that are generally applicable
  - DO concisely summarize the law *most relevant* to your argument
- Bullet points, headings, and summaries are great
- Use a well-organized Table of Contents (with summaries)
- **CLEARLY STATE YOUR DESIRED OUTCOME:** Remand or outright reversal
- Proofread, proofread, proofread with an eye towards making your case as clear and straightforward as possible




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#2

## STANDARDS OF REVIEW

*The Board reviews factual and credibility determinations only to determine whether the immigration judge's finding was **clearly erroneous**. The Board reviews all other issues—including questions of law, discretion, and judgment—**de novo**.*

8 C.F.R. 1003.1(d)(3)(i).

- Findings of fact and credibility determinations: Clear Error
- All other issues: De Novo




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#2

## STANDARDS OF REVIEW: CLEAR ERROR

- Question of fact: One that does not involve determining what the law is.
- Examples:
  - Persecutor's motive. *Matter of N-M-*, 25 I&N Dec. 526, 532 (BIA 2011)
  - Whether an applicant knowingly and deliberately fabricated elements of an asylum claim. *Matter of Y-L-*, 24 I&N Dec. 151, 159 (BIA 2007).
- A determination is only "clearly erroneous" if, "although there is evidence to support it, the reviewing Board member or panel is left with the definite and firm conviction that a mistake has been committed." *Matter of R-S-H-*, 23 I&N Dec. 629, 637 (BIA 2003) (quoting *United States v. United States Gypsum Co.*, 333 U.S. 364, 395 (1948)).




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## STANDARDS OF REVIEW: DE NOVO (QUESTIONS OF LAW)

Question of Law: One that the law can authoritatively answer.

- Example:

- Whether a group is a "particular social group" for purposes of asylum and withholding.  
*Matter of A-R-G-C-*, 26 I&N Dec. 388, 390 (BIA 2014).

*Board's ruling may be based on a completely new decision, entirely up to what the Board Member or panel decides anew.*




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#2

## STANDARDS OF REVIEW: DE NOVO (DISCRETION)

Discretion: an "exercise of judgment by a judge or court based on what is fair under the circumstances."

- Examples:

- Whether to grant: adjustment of status, cancellation of removal, asylum (kind of), etc.

*Determining whether to grant an application as a matter of discretion requires balancing positive and negative equities.*




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## STANDARD OF REVIEW: MIXED QUESTIONS OF LAW & FACT (AND MIXED UP QUESTIONS OF FACT AND LAW)

Examples:

- Whether a fabrication on an asylum application was "material." *Matter of Y-L-*, 24 I&N Dec. 151, 159 (BIA 2007).
- Future fear of persecution:
  - *Matter of ZZO-*, 26 I&N Dec. 586 (BIA 2015)
  - An IJ's predictive findings of what may or may not occur in the future are findings of fact (clear error).
  - Whether an asylum applicant has an objectively reasonable fear of persecution based on the events that the Immigration Judge found may occur in the future is a legal determination (de novo).




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## HANDLING NEW EVIDENCE ON APPEAL

"Except for taking administrative notice of commonly known facts such as current events or the contents of official documents, the Board will not engage in fact-finding in the course of deciding appeals..."

8 C.F.R. § 1003.1(d)(3)(iv)




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## KEEP YOUR EYE ON THE CIRCUIT

- BIA is bound to follow the law of the circuit in which a matter arises (but not a federal district court order, unless directed at the BIA specifically)
  - Decisions of other circuit courts may be argued for persuasive authority
- Circuit Courts of Appeal have certain limitations on review of BIA decisions
  - Understand the difference between Circuit Court and BIA Standards of Review
  - Frame as much of your argument as possible as question of law, and not a factual or discretionary dispute




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## BUT DON'T FORGET TO WRITE FOR THE BIA

- BIA loves its own case law best
  - BIA Precedent Chart:
  - <https://www.justice.gov/eoir/bia-precedent-chart>
- Know the practice manual
  - Wonky rules and tricks
  - Ex: Reply briefs only allowed by request, not as a matter of right




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## REVIEW: 5 TIPS FOR SUCCESS AT THE BIA

- Know the BIA decision-making process and write accordingly
- Understand and properly use the BIA standards of review
- Appropriately handle new evidence on appeal
- Keep your eye on your Circuit Court of Appeal
- But don't forget to write for the BIA




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## CONTINUING THE ADVOCACY: PREPARING YOUR CASE FOR FEDERAL CIRCUIT COURT REVIEW




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## PRELIMINARY ESSENTIALS

### Where do I file?

- Circuit court where the IJ "completed the decision" (usually the place of the hearing)

### What do I file?

- Petition for Review.
- Short notice, like a Notice of Appeal
- Sample forms in FRAP forms appendix

### When do I file?

- Received by clerk within 30 days of the date of the final order of removal - this is *jurisdictional*
- If no briefing order, FRAP rules require administrative record within 40 days of service, opening brief 40 days after that




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## COURT OF APPEALS – JURISDICTION

Exclusive jurisdiction to review “a final order of removal,” except for expedited removal orders. 8 USC 1252(g)

➤ **Final order of removal** is an order by the BIA affirming an IJ order of removal or finding of removability.

➤ **Zipper clause** – Any questions of law and fact arising from an order of removal *must* be raised in a petition for review of that order. The zipper clause consolidates or “zips” judicial review of immigration proceedings into one action in the court of appeals.




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## COURTS OF APPEALS – JURISDICTION

### 8 USC 1252 Jurisdictional Bars

➤ Expedited orders of removal

➤ Discretionary Judgments.

➤ Specified discretionary decisions relating to Criminal Inadmissibility Waiver, Fraud or Misrepresentation Waiver, Cancellation of Removal, Voluntary Departure, Adjustment of Status. 1252(a)(2)(b)

➤ Any other discretionary decision “specified in this subchapter” to be in the discretion of the AG or DHS. 1252(a)(2)(b)

➤ Savings Clause

➤ Notwithstanding any other provision, **constitutional claims and questions of law are always subject to judicial review** in a properly filed PFR. 8 USC 1252(a)(2)(D)




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## COURT OF APPEALS – JURISDICTION

### Exhaustion

➤ Court will not hear claims that were not raised below

➤ Exceptions: constitutional challenges, claims that would have been futile, or nationality claims.

➤ **WARNING!** Re-casting a PSG as something entirely different on appeal may be a problem. Check your circuit caselaw




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## SCOPE OF APPELLATE REVIEW

8 USC 1252(b)(4):

- review limited to administrative record
- administrative findings of fact are conclusive unless any reasonable adjudicator would be compelled to conclude to the contrary
- a decision that alien is not eligible for admission is conclusive unless manifestly contrary to law; Attorney General's discretionary judgment whether to grant relief under section 1158(a) of this title shall be conclusive unless manifestly contrary to the law and an abuse of discretion.




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## STANDARD OF REVIEW DEPENDS ON CLAIM

### ➤ Question of law

- De novo review
  - *Chevron/Skidmore* deference when statute is ambiguous
    - But an agency can change its mind
    - If ambiguous, is agency interpretation a "permissible construction of the statute"

### ➤ Question of fact

- Substantial evidence standard
  - "A finding by the IJ is not supported by substantial evidence when any reasonable adjudicator would be compelled to conclude to the contrary based on the evidence in the record." *Bringas-Rodriguez*, 850 F.3d at 1059

### ➤ Abuse of discretion

- Failure to provide reasoned explanation, or failure to consider arguments or evidence is a basis for finding an abuse of discretion in a particular finding.
- "The BIA abuses its discretion when it acts arbitrarily, irrationally, or contrary to the law, and when it fails to provide a reasoned explanation for its actions." *Tadevosyan v. Holder*, 743 F.3d 1250, 1252-53 (9th Cir. 2014).




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## DON'T SHOOT IF YOU HAVE NOT SET UP THE SHOT

Pre-AB?

❗ If your *pre-AB* case was framed with heavy reliance on *A.R.C.G.*, you might seek remand in your direct appeal to the Board to allow you to present other social groups, or other claims for asylum, based on the change in the law

Did BIA address AB in your case?

❗ If not, consider a motion to remand to allow the agency to consider the issue before the Court of Appeals considers this new rule of applicability in your case

Remedy PGO or appeal?

❗ Consider how *Matter of W-Y-C & H-Q-B* holding re "substantially similar" social groups may affect your appeal




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## CIRCUIT COURTS SO FAR ON *MATTER OF AB*

### SOMEWHAT POSITIVE/USEFUL

- *Silvestre-Mendoza v. Sessions*, 729 F.App'x 597 (9th Cir. 7/3/18)
  - Reversing denial when BIA failed to consider gravamen of persecution claim:
    - BIA justified in finding that Silvestre failed to show that "young Guatemalan females who have suffered violence due to female gender" were socially distinct, but BIA should have considered whether "Guatemalan women" is a particular social group since "Guatemalan women" subsumes "young Guatemalan females who have suffered violence due to female gender", and it is the gravamen of Silvestre's persecution claim.
    - Noted that relevance of *Matter of AB* should be decided on remand.
- *Juan-Pedro v. Sessions*, 2018 WL 3202953 (6th Circuit) (6/29/18)
  - Reversing BIA on substantial evidence standard for affirming no nexus when undisputed evidence showing that PSG was one central reason for persecution, even if gang attack was also motivated by "criminal and financial interests"
- *Rosales Justo v. Sessions*, 895 F.3d 154 (1st Cir. 7/16/2018)
  - Reversing BIA for misapplying law requiring that foreign government be unwilling and unable to protect when it looked only at only whether investigation was initiated, not the quality of it; and distinguishing *AB* as a case in which there was evidence that the applicant reached out to police and police provided protective orders




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## CIRCUIT COURTS SO FAR ON *MATTER OF AB*

### SOMEWHAT CONCERNING/NEUTRAL

- *Martinez-Martinez v. Sessions*, 2018 WL 3559205 (6th Cir. 7/24/18)
  - expressing concern that BIA and IJ failed to explain how it concluded that testimony that violence escalated after accusations of drug trafficking creating fear of disclosure would have negated the nexus between proposed social group and the abuse, but affirming on other grounds. Has a "but see" cite to *Matter of AB*
- *Martínez-Pérez v. Sessions*, 897 F.3d 33 (5th Cir. 2018)
  - Notes case in footnote but holds not relevant since issue before the court is frequency of persecution.
- *Lopez v. Sessions*, 2018 WL 3730137 (10th Cir. 8/6/18)
  - Citing *Matter of AB* to support proposition that PSG must be recognizable by society




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## SUBSTANTIVE *MATTER OF AB* ARGUMENTS TO CONSIDER ON APPEAL

- *AB* established no new rule. It is a narrow opinion, the only actual holdings of which were that ARCG was wrongly decided because the Board accepted party concessions and did not explain its reasoning, and that *AB* was wrongly decided because the Board simply referred to ARCG.
- If *AB* is construed to constitute new law, it is not based on a permissible construction of the statute.




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## ARGUMENTS: INTERPRETATION IS NOT PERMISSIBLE

- **Contrary to Statute**
  - For example, in discussion of "persecution," the AG conflate the separate elements of harm, of nexus, and of government inability or unwillingness to protect – all separate elements of the statute which must be analyzed separately under canons of construction.
  - The decision suggests that asylum claims based on particular social groups involving domestic or gang violence must meet a higher standard than other asylum claims based on other social groups or political opinion or religion, but that is contrary to the statute which requires claimants in all groups to meet the same statutory elements.
- **Poor and Illogical reasoning**
  - For example, the suggestion that "most" claimants who are victims of domestic violence will not be able to show nexus because their social groups are supposedly defined by their persecution is illogical (because the "inability to leave" is not persecution) and it ignored the evidence presented in AB.
  - The AG's conclusion that information about stereotypes is not "helpful" is nonsensical absurd in the context of social groups – an existing stereotype may be evidence that those in the country see those so stereotyped as a social group.
- **Inconsistent with caselaw on which the AG relied**
  - Contrary to the AG's refrain that the social group must be independent of the persecution, the statute and circuit court law (including cases cited by the AG) make clear that complete independence is not required – the rule is that a social group cannot be solely defined by the persecution of its members.




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## ARGUMENTS: INTERPRETATION IS NOT PERMISSIBLE

- **Internal Inconsistencies**
  - For example, the AB says several times that it is not concluding that there could never be a successful asylum claim by a victim of domestic violence, but it offers no examples of cases which would be successful and offers no rational means to determine which cases should be successful. It is vague and invites arbitrary decision-making.
- **Legal conclusions from non-evidence-based factual assertions**
  - Much of the AG's opinion was based on factual assertions for which he cited no evidence.
    - First, make clear that those "conclusions" were fact-free and are not legal conclusions.
    - Second, *your* facts can make those conclusions wholly irrelevant. For example:
      - Expert testimony about the dynamics of domestic violence in a particular case defeat the AG's surmise in AB that women stay in relationships only because of the harm to which they are subjected.
      - Expert testimony about country conditions can defeat the AG's baseless conclusion that a social group did not meet social distinction or particularity requirements, as well as nexus.




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## ARGUMENTS: INTERPRETATION IS NOT PERMISSIBLE

- **Failure to adequately explain departure from co-equal agency position and prior precedent**
  - DHS position as evidenced in its brief was that as a matter of statutory interpretation, ARGC was properly decided.
  - *Matter of AB* did not explain how ARCG was substantively wrong – it was a procedural decision that the Board wrongly accepted DHS "concessions" and did not explain its reasoning. But AB does not address the evidence in ARCG or explain why, on the facts before it, the social group there was not cognizable.




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**QUESTIONS?**

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**STAY IN TOUCH FOR UPCOMING PROGRAMS AND JOINING TAHIRIH'S PRO BONO NETWORK**

- Join Tahirih's Pro Bono Network at [www.tahirih.org/get-involved/our-pro-bono-network/join-our-network](http://www.tahirih.org/get-involved/our-pro-bono-network/join-our-network)
- E-mail [justice@tahirih.org](mailto:justice@tahirih.org) for questions or more information about the Pro Bono Network






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**Thank You!**

The recording will be available on the e-library.



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