

January 6, 2009

U.S. Citizenship and Immigration Services
Nebraska Service Center
P.O. Box 87589
Lincoln, NE 68508

Re: Asylum Application of Mary T. Jones A# Unassigned

Dear Officer:

Enclosed please find the above mention client's application for asylum. The following documents are included:

1. Form G-28 Entry of Appearance as Attorney;
2. Form I-589 Application for asylum for Ms. Makoni (original with two copies) with photos attached;
3. Affidavit in support of application for asylum for Ms. Makoni (original with two copies);
4. Three complete copies of Ms. Makoni's passport;

Ms. Jones's asylum application is timely filed. Ms. Jones last arrived in the United States on May 20, 2008 as an F-1 student. As such, she is filing this application within one year of her last arrival in the United States as required by INA § 208(a)(2)(B), 8 U.S.C. § 1158(a)(2)(B). Additionally, Ms. Makoni has been and is currently in valid F-1 status at Dickinson State University. As someone in valid student status, Ms. Makoni would also qualify for an exception to the one-year filing deadline based on extraordinary circumstances. 8 C.F.R. § 208.4(a)(5)(iv).

Jones's claim is articulated in detail in both her I-589 and in her supporting affidavit. Ms. Jones will be submitting additional documentation as necessary to support her claim.

Thank you for your consideration of this claim. We look forward to your acknowledgment of receipt.

Sincerely,



Sam Shephard
Attorney at Law

SSS/enclosures

Cc: Mary Jones

**I-589, Application for Asylum
and for Withholding of Removal**

START HERE - Please type or print in black ink. See the Instructions for information about eligibility and how to complete and file this application. There is NO filing fee for this application.

NOTE: Please check this box if you also want to apply for withholding of removal under the Convention Against Torture. ☒

Part A. I. Information about you.

1. Alien Registration Number(s) (A#s) (If any) None		2. U.S. Social Security Number (If any) 111-11-1111	
3. Complete Last Name JONES	4. First Name Mary	5. Middle Name Theresa	
6. What other names have you used? (Include maiden name and aliases.) None			
7. Residence in the U.S. (Where you physically reside.) Street Number and Name 111 4th Ave		Telephone Number (111) 111-1111	
City Dickinson	State ND	Zip Code 55661	
8. Mailing Address in the U.S. (If different than the address in No. 7) In Care Of (If applicable): Street Number and Name 3000 80th Street N.		Telephone Number () Apt. Number	
City Brooklyn Park	State MN	Zip Code 54454	
9. Gender: <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female		10. Marital Status: <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed	
11. Date of Birth (mm/dd/yyyy) 05/15/1979		12. City and Country of Birth Harare, Zimbabwe	
13. Present Nationality (Citizenship) Zimbabwean	14. Nationality at Birth Zimbabwean	15. Race, Ethnic or Tribal Group Black	16. Religion Christian
17. Check the box, a through c, that applies: a. <input checked="" type="checkbox"/> I have never been in Immigration Court proceedings. b. <input type="checkbox"/> I am now in Immigration Court proceedings. c. <input type="checkbox"/> I am not now in Immigration Court proceedings, but I have been in the past.			
18. Complete 18 a through c. a. When did you last leave your country? (mmm/dd/yyyy) 01/09/2008 b. What is your current I-94 Number, if any? 1234567891 c. Please list each entry into the U.S. beginning with your most recent entry. List date (mm/dd/yyyy), place, and your status for each entry. (Attach additional sheets as needed.) Date 05/20/2008 Place Denver, CO Status F-1 Date Status Expires: D/S Date _____ Place _____ Status _____ Date _____ Place _____ Status _____			
19. What country issued your last passport or travel document? Zimbabwe		20. Passport # AN111111 Travel Document # N/A	
21. Expiration Date (mm/dd/yyyy) 02/12/2013			
22. What is your native language? (Include dialect, if applicable.) English		23. Are you fluent in English? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
24. What other languages do you speak fluently? Shona			
For EOIR use only.		For USCIS use only. Decision:	
Interview Date: _____		Approval Date: _____	
Asylum Officer ID#: _____		Denial Date: _____	
		Referral Date: _____	

Part A. II. Information about your spouse and children.Your spouse. ☒ I am not married. (Skip to **Your children**, below.)

1. Alien Registration Number (A#) (If any)	2. Passport/ID Card No. (If any)	3. Date of Birth (mm/dd/yyyy)	4. U.S. Social Security No. (If any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Maiden Name
9. Date of Marriage (mm/dd/yyyy)	10. Place of Marriage	11. City and Country of Birth	
12. Nationality (Citizenship)	13. Race, Ethnic or Tribal Group	14. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	
15. Is this person in the U.S. ? <input type="checkbox"/> Yes (Complete Blocks 16 to 24.) <input type="checkbox"/> No (Specify location.)			
16. Place of last entry in the U.S.	17. Date of last entry in the U.S. (mm/dd/yyyy)	18. I-94 No. (If any)	19. Status when last admitted (Visa type, if any)
20. What is your spouse's current status?	21. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	22. Is your spouse in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	23. If previously in the U.S., date of previous arrival (mm/dd/yyyy)
24. If in the U.S., is your spouse to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Your children. Please list **all** of your children, regardless of age, location or marital status.☐ I do not have any children. (Skip to **Part A. III., Information about your background.**)☒ I have children. Total number of children: 1

(NOTE: Use Supplement A Form I-589 or attach additional sheets of paper and documentation if you have more than four children.)

1. Alien Registration Number (A#) (If any) None	2. Passport/ID Card No. (If any) None	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security No. (If any) None
5. Complete Last Name Jones	6. First Name Michael	7. Middle Name n/a	8. Date of Birth (mm/dd/yyyy) 03/23/2006
9. City and Country of Birth Masvingo, Zimbabwe	10. Nationality (Citizenship) Zimbabwean	11. Race, Ethnic or Tribal Group Black	12. Gender <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S. ? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input checked="" type="checkbox"/> No (Specify location.) <u>Zimbabwe</u>			
14. Place of last entry in the U.S. N/A	15. Date of last entry in the U.S. (mm/dd/yyyy) N/A	16. I-94 No. (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Part A. II. Information about your spouse and children. (Continued.)

1. Alien Registration Number (A#) (If any)	2. Passport/ID Card No. (If any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security No. (If any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S. ? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location.)			
14. Place of last entry in the U.S.	15. Date of last entry in the U.S. (mm/dd/yyyy)	16. I-94 No. (If any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

1. Alien Registration Number (A#) (If any)	2. Passport/ID Card No. (If any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security No. (If any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location.)			
14. Place of last entry in the U.S.	15. Date of last entry in the U.S. (mm/dd/yyyy)	16. I-94 No. (If any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

1. Alien Registration Number (A#) (If any)	2. Passport/ID Card No. (If any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security No. (If any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S. ? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location.)			
14. Place of last entry in the U.S.	15. Date of last entry in the U.S. (mm/dd/yyyy)	16. I-94 No. (If any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any ? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Part A. III. Information about your background.

1. Please list your last address where you lived before coming to the U.S. If this is not the country where you fear persecution, also list the last address in the country where you fear persecution. (List Address, City/Town, Department, Province, or State and Country.)
(NOTE: Use Supplement B, Form I-589 or additional sheets of paper, if necessary.)

Number and Street (Provide if available)	City/Town	Department, Province or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
MDS School	Masvingo		Zimbabwe	03/2006	01/2008
1111 Block 4E	Highfields		Zimbabwe	03/1988	03/2006

2. Provide the following information about your residences during the past five years. List your present address first.
(NOTE: Use Supplement B, Form I-589 or additional sheets of paper, if necessary.)

Number and Street	City/Town	Department, Province or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
111 4th Avenue	Dickinson	ND	USA	01/2009	present
3000 80th Street N.	Brooklyn Park	MN	USA	10/2008	01/2009
111 5th Avenue	Dickinson	ND	USA	01/2008	10/2008
MDT School	Masvingo		Zimbabwe	03/2006	01/2008
1111 Block 4E	Highfields		Zimbabwe	03/1988	03/2006

3. Provide the following information about your education, beginning with the most recent.
(NOTE: Use Supplement B, Form I-589 or additional sheets of paper, if necessary.)

Name of School	Type of School	Location (Address)	Attended	
			From (Mo/Yr)	To (Mo/Yr)
Dickinson University	University	Dickinson, ND	01/2008	present
V High School	High School (A Level)	Borrowdale, Zimbabwe	01/2005	11/2006
H High School	High School	Glendale, Zimbabwe	01/2001	11/2004
H Primary (Mbizi)	Primary	Highfields, Zimbabwe	01/1993	11/2000

4. Provide the following information about your employment during the past five years. List your present employment first.
(NOTE: Use Supplement B, Form I-589 or additional sheets of paper, if necessary.)

Name and Address of Employer	Your Occupation	Dates	
		From (Mo/Yr)	To (Mo/Yr)
None	None	07/2008	present
Bakery, Dickinson, ND (through work study)	Production	03/2008	06/2008
None	None	03/1988	03/2008

5. Provide the following information about your parents and siblings (brothers and sisters). Check the box if the person is deceased.
(NOTE: Use Supplement B, Form I-589 or additional sheets of paper, if necessary.)

Full Name	City/Town and Country of Birth	Current Location
Mother Meredith Smith	Masvingo, Zimbabwe	<input type="checkbox"/> Deceased Zimbabwe (last known)
Father Michael Jones	Zimbabwe	<input checked="" type="checkbox"/> Deceased
Sibling Evan Jones	Harare, Zimbabwe	<input type="checkbox"/> Deceased South Africa (last known)
Sibling Mary Jones	Harare, Zimbabwe	<input type="checkbox"/> Deceased Zimbabwe (last known)
Sibling Jonathan Jones	Harare, Zimbabwe	<input type="checkbox"/> Deceased Zimbabwe (last known)
Sibling Allison Jones	Harare, Zimbabwe	<input type="checkbox"/> Deceased Zimbabwe (last known)

Part B. Information about your application.

(NOTE: Use Supplement B, Form I-589 or attach additional sheets of paper as needed to complete your responses to the questions contained in Part B.)

When answering the following questions about your asylum or other protection claim (withholding of removal under 241(b)(3) of the INA or withholding of removal under the Convention Against Torture) you should provide a detailed and specific account of the basis of your claim to asylum or other protection. To the best of your ability, provide specific dates, places and descriptions about each event or action described. You should attach documents evidencing the general conditions in the country from which you are seeking asylum or other protection and the specific facts on which you are relying to support your claim. If this documentation is unavailable or you are not providing this documentation with your application, please explain why in your responses to the following questions.

Refer to Instructions, Part 1: Filing Instructions, Section II, "Basis of Eligibility," Parts A - D, Section V, "Completing the Form," Part B, and Section VII, "Additional Evidence That You Should Submit," for more information on completing this section of the form.

1. Why are you applying for asylum or withholding of removal under section 241(b)(3) of the INA, or for withholding of removal under the Convention Against Torture? Check the appropriate box(es) below and then provide detailed answers to questions A and B below:

I am seeking asylum or withholding of removal based on:

- | | |
|--------------------------------------|---|
| <input type="checkbox"/> Race | <input checked="" type="checkbox"/> Political opinion |
| <input type="checkbox"/> Religion | <input checked="" type="checkbox"/> Membership in a particular social group |
| <input type="checkbox"/> Nationality | <input type="checkbox"/> Torture Convention |

- A. Have you, your family, or close friends or colleagues ever experienced harm or mistreatment or threats in the past by anyone?

☐ No ☒ Yes

If "Yes," explain in detail:

- (1) What happened;
- (2) When the harm or mistreatment or threats occurred;
- (3) Who caused the harm or mistreatment or threats; and
- (4) Why you believe the harm or mistreatment or threats occurred.

My father, grandparents, and uncle have all been killed by Zanu-PF agents. My sister was beaten by Zanu-PF agents. I was once detained for three days and beaten by Zanu-PF agents; on another occasion I was taken to a re-education camp for youth who are not supporters of Zanu-PF and I was repeatedly raped over a period of two weeks. All of these incidents were perpetrated by Zanu-PF agents, who work on behalf of the Zimbabwean government. In each case, my family and I were singled out because of our support for the MDC (Movement for Democratic Change) and our opposition to the Zimbabwean government. My father died in March, 2006, my uncle in February 2008 and my grandparents sometime in early 2007. I was jailed first on September, 25 2006 and the second time in April of 2006. My sister was beaten sometime in 2004, but I am not sure of the date. Please see my attached affidavit for additional details.

- B. Do you fear harm or mistreatment if you return to your home country?

☐ No ☒ Yes

If "Yes," explain in detail:

- (1) What harm or mistreatment you fear;
- (2) Who you believe would harm or mistreat you; and
- (3) Why you believe you would or could be harmed or mistreated.

I believe that I would be beaten, raped, jailed, possibly tortured and possibly killed by agents of the Zanu-PF government, including the military or police because of my support of the MDC opposition party, my participation in the group Mazwi, my escape from a government-run military re-education camp where I was repeatedly raped, my family's support of the MDC, and the fact that my grandparents and my uncle were killed by Zanu-PF forces because they helped me hide and escape. Please see my attached affidavit for additional details about these incidents.

Part B. Information about your application. (Continued.)

2. Have you or your family members ever been accused, charged, arrested, detained, interrogated, convicted and sentenced, or imprisoned in any country other than the United States?

☐ No

☒ Yes

If "Yes," explain the circumstances and reasons for the action.

In March of 2006 I was falsely charged by members of the Zanu-PF military with loitering. I was never fined or brought before a Judge, and I do not believe these charges were actually filed. I was detained at the police station for 3 days. I was also imprisoned for three weeks at a military re-education camp in July of 2006. Both of these incidents took place in Zimbabwe. Please see my attached affidavit for additional detail about these incidents.

- 3.A. Have you or your family members ever belonged to or been associated with any organizations or groups in your home country, such as, but not limited to, a political party, student group, labor union, religious organization, military or paramilitary group, civil patrol, guerrilla organization, ethnic group, human rights group, or the press or media?

☐ No

☒ Yes

If "Yes," describe for each person the level of participation, any leadership or other positions held, and the length of time you or your family members were involved in each organization or activity.

My entire family were members of the MDC (Movement for Democratic Change). My parents joined in 1996, my siblings and I joined in 2005. None of us ever held any official position, we were just members.

- B. Do you or your family members continue to participate in any way in these organizations or groups?

☒ No

☐ Yes

If "Yes," describe for each person your or your family members' current level of participation, any leadership or other positions currently held, and the length of time you or your family members have been involved in each organization or group.

I have not been participating in the MDC since I came to the U.S., as I've been focusing on my studies. I don't know about any of my family members' continuing participation.

4. Are you afraid of being subjected to torture in your home country or any other country to which you may be returned?

☐ No

☒ Yes

If "Yes," explain why you are afraid and describe the nature of torture you fear, by whom, and why it would be inflicted.

I believe they would torture me if I returned to Zimbabwe as continuing punishment for my support of the MDC, my family's support of the MDC, and my escape from the re-education camp. I am aware of many torture techniques used by Zanu-PF agents; I was previously tied to a table and beaten on my feet, back and head with a rubber hose by Zanu-PF agents. I was also repeatedly raped by Zanu-PF military members.

Part C. Additional information about your application.

(NOTE: Use Supplement B, Form I-589 or attach additional sheets of paper as needed to complete your responses to the questions contained in Part C.)

1. Have you, your spouse, your child(ren), your parents or your siblings ever applied to the U. S. Government for refugee status, asylum or withholding of removal?

☒ No ☐ Yes

If "Yes," explain the decision and what happened to any status you, your spouse, your child(ren), your parents or your siblings received as a result of that decision. Please indicate whether or not you were included in a parent or spouse's application. If so, please include your parent or spouse's A-number in your response. If you have been denied asylum by an Immigration Judge or the Board of Immigration Appeals, please describe any change(s) in conditions in your country or your own personal circumstances since the date of the denial that may affect your eligibility for asylum.

2. A. After leaving the country from which you are claiming asylum, did you or your spouse or child(ren) who are now in the United States travel through or reside in any other country before entering the United States? ☐ No ☒ Yes

- B. Have you, your spouse, your child(ren) or other family members, such as your parents or siblings, ever applied for or received any lawful status in any country other than the one from which you are now claiming asylum?

☒ No ☐ Yes

If "Yes" to either or both questions (2A and/or 2B), provide for each person the following: the name of each country and the length of stay, the person's status while there, the reasons for leaving, whether or not the person is entitled to return for lawful residence purposes, and whether the person applied for refugee status or for asylum while there, and if not, why he or she did not do so.

I flew through Johannesburg, South Africa and London, England on my way to the United States. These were just stops, and I was not in either country for more than a few hours.

3. Have you, your spouse or your child(ren) ever ordered, incited, assisted or otherwise participated in causing harm or suffering to any person because of his or her race, religion, nationality, membership in a particular social group or belief in a particular political opinion?

☒ No ☐ Yes

If "Yes," describe in detail each such incident and your own, your spouse's or your child(ren)'s involvement.

Part C. Additional information about your application. (Continued.)

4. After you left the country where you were harmed or fear harm, did you return to that country?

☒ No

☐ Yes

If "Yes," describe in detail the circumstances of your visit(s) (for example, the date(s) of the trip(s), the purpose(s) of the trip(s) and the length of time you remained in that country for the visit(s).)

5. Are you filing this application more than one year after your last arrival in the United States?

☒ No

☐ Yes

If "Yes," explain why you did not file within the first year after you arrived. You should be prepared to explain at your interview or hearing why you did not file your asylum application within the first year after you arrived. For guidance in answering this question, see Instructions, Part 1: Filing Instructions, Section V. "Completing the Form," Part C.

6. Have you or any member of your family included in the application ever committed any crime and/or been arrested, charged, convicted and sentenced for any crimes in the United States?

☒ No

☐ Yes

If "Yes," for each instance, specify in your response: what occurred and the circumstances, dates, length of sentence received, location, the duration of the detention or imprisonment, the reason(s) for the detention or conviction, any formal charges that were lodged against you or your relatives included in your application and the reason(s) for release. Attach documents referring to these incidents, if they are available, or an explanation of why documents are not available.

Part D. Your Signature.

I certify, under penalty of perjury under the laws of the United States of America, that this application and the evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(a), provides in part: Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact in any application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, or knowingly presents any such application, affidavit, or other document containing any such false statement or which fails to contain any reasonable basis in law or fact - shall be fined in accordance with this title or imprisoned for up to 25 years. I authorize the release of any information from my immigration record that U.S. Citizenship and Immigration Services (USCIS) needs to determine eligibility for the benefit I am seeking.

Staple your photograph here or the photograph of the family member to be included on the extra copy of the application submitted for that person.

WARNING: Applicants who are in the United States illegally are subject to removal if their asylum or withholding claims are not granted by an asylum officer or an immigration judge. Any information provided in completing this application may be used as a basis for the institution of, or as evidence in, removal proceedings even if the application is later withdrawn. Applicants determined to have knowingly made a frivolous application for asylum will be permanently ineligible for any benefits under the Immigration and Nationality Act. You may not avoid a frivolous finding simply because someone advised you to provide false information in your asylum application. If filing with USCIS, unexcused failure to appear for an appointment to provide biometrics (such as fingerprints) and your biographical information within the time allowed may result in an asylum officer dismissing your asylum application or referring it to an immigration judge. Failure without good cause to provide DHS with biometrics or other biographical information while in removal proceedings may result in your application being found abandoned by the immigration judge. See sections 208(d)(5)(A) and 208(d)(6) of the INA and 8 CFR sections 208.10, 1208.10, 208.20, 1003.47(d) and 1208.20.

Print your complete name.

Mary Theresa Jones

Write your name in your native alphabet.

mary Theresa Jones

Did your spouse, parent or child(ren) assist you in completing this application? ☒ No ☐ Yes (If "Yes," list the name and relationship.)

(Name)

(Relationship)

(Name)

(Relationship)

Did someone other than your spouse, parent or child(ren) prepare this application?

☐ No☒ Yes (If "Yes," complete Part E.)

Asylum applicants may be represented by counsel. Have you been provided with a list of persons who may be available to assist you, at little or no cost, with your asylum claim?

☒ No☐ Yes

Signature of Applicant (The person in Part A.I.)

[Mary T. Jones]

Sign your name so it all appears within the brackets

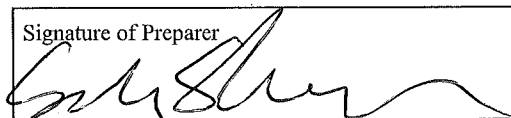
01/06/2009

Date (mm/dd/yyyy)

Part E. Declaration of person preparing form, if other than applicant, spouse, parent or child.

I declare that I have prepared this application at the request of the person named in Part D, that the responses provided are based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language or a language he or she understands for verification before he or she signed the application in my presence. I am aware that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. 1324c and/or criminal penalties under 18 U.S.C. 1546(a).

Signature of Preparer



Print Complete Name of Preparer

Sam Shephard

Daytime Telephone Number

(612) 341-3302

Address of Preparer: Street Number and Name

The Advocates for Human Rights, 650 3rd Avenue S.

Apt. No.

1240

City

Minneapolis

State

MN

Zip Code

55402

Part F. To be completed at asylum interview, if applicable.

NOTE: *You will be asked to complete this Part when you appear for examination before an asylum officer of the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS).*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered _____ to _____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date (mm/dd/yyyy)

Write Your Name in Your Native Alphabet

Signature of asylum officer

Part G. To be completed at removal hearing, if applicable.

NOTE: *You will be asked to complete this Part when you appear before an immigration judge of the U.S. Department of Justice, Executive Office for Immigration Review (EOIR), for a hearing.*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered _____ to _____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date (mm/dd/yyyy)

Write Your Name in Your Native Alphabet

Signature of immigration judge

Supplement A, Form I-589

A # (If available)	Date
Applicant's Name	Applicant's Signature

List all of your children, regardless of age or marital status.
 (NOTE: Use this form and attach additional pages and documentaton as needed, if you have more than four children.)

1. Alien Registration Number (A#) (If any)	2. Passport/ID Card Number (If any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (If any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete blocks 14 to 21.) <input type="checkbox"/> No (Specify location.) _____			
14. Place of last entry in the U.S.	15. Date of last entry in the U.S. (mm/dd/yyyy)	16. I-94 Number (If any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

1. Alien Registration Number (A#) (If any)	2. Passport/ID Card Number (If any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (If any)
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9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete blocks 14 to 21.) <input type="checkbox"/> No (Specify location.) _____			
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21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Supplement B, Form I-589

Additional information about your claim to asylum.

A# (If available)

Date

Applicant's Name

Applicant's Signature

NOTE: Use this as a continuation page for any additional information requested. Please copy and complete as needed.

Part _____

Question _____

JONES, Mary Theresa
A# NUMBER

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Mary Jones)	Affidavit of Applicant
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alone. They told me that in 2006, my father was beaten to death by members of the Zanu-PF militia. These two men, who were soldiers he worked with, claimed they witnessed his beating. I believe that it happened when my father was at work, but we've never known for certain. We did file a report with the police and followed up with them about any investigation of my father's death. However, we never learned anything further and nobody ever found my father's body.

5. A few weeks after my father's death, in the afternoon in 2006 I was walking home from the bus when I suddenly heard footsteps behind me and felt a gun at the back of my head. I heard a voice say "why are you and your family supporting the MDC?" I figured out I had been accosted by five Zanu-PF soldiers because I recognized their uniforms. I do not know how they knew me. One of them forced me down on the ground and held me there, while another continued to hold the gun to my head. The other three soldiers were interrogating me about why my family supported the MDC. They tied my hands behind my back with rope and put me in the back of their truck after a few minutes. The back of the truck was enclosed, without any windows, like an armored truck.
6. I was taken to a police station that was about thirty minutes drive away. The soldiers told the police officers to press charges against me for loitering. I was put into a cell, alone. I did not receive any food while I was in the station cell. Once I begged for water, and the police officer took me to a tap. Two officers held my arms back while one hit me in the head and forced me to drink the water until I choked. After awhile, I was taken back to my cell. I was beaten three times while at the station. Each time I was taken out of my cell to another room. I was tied to a table, where they beat the soles of my feet, my back, and my head, using a rubber hose. I had bruises on my thighs and feet as a result of the beatings. I also had serious headaches because of the beatings to my head. I was

- released when my mom came to the station and paid a fine to get my release three days after I was arrested. I still do not know how she found out where I was. We immediately went home.
7. After my release, I was angry. I was angry about my father's death, and angry about my own detention and beating by the police. I wanted to do something constructive with my anger, so I decided to join a group called Mazwi, which means "voices." I learned about Mazwi from a friend of mine at school. Mazwi is a non-political group of young people in Harare who had been victims of political persecution either directly or indirectly. The group was comprised of about 50 people. The members of Mazwi believed that an individual should be able to choose whether to join or support a political party, and which party to join or support. I attended a few meetings, on Thursdays and Fridays, at people's homes over the course of about two weeks in 2006.
 8. Mazwi members organized a peaceful demonstration on 2006. We decided to hold the demonstration in Chitungwiza, a more rural town near Harare, to avoid any problems with the security forces, military or police. Unfortunately, this strategy did not work. Within a few moments of the start of our demonstration, the Zanu-PF forces appeared. We do not know how they found out, as we had not advertised our demonstration. The demonstration was only comprised of Mazwi members, maybe 50 people, with a few signs bearing slogans about peace and human rights. We were singing and chanting peacefully when the forces appeared. There were maybe 20 of them, and they started throwing teargas, shooting and releasing dogs.
 9. I immediately starting running through the streets, but I was not familiar with Chitungwiza so I didn't know where to go. I saw a trashcan after a few blocks, and I

quickly scrambled into it to hide. I stayed crouched in the trash can for quite awhile, until it got quiet and I was certain it was safe to come out.

10. As I stood up to get out of the trash can, I realized my left foot was sore and bleeding quite a lot. I was wearing sandals that day, so much of my foot was exposed and I saw there was a large cut on top of my foot. I must have caught my foot on a wire or the edge of the can when I was climbing in to hide. Fortunately, I was wearing two t-shirts that day, so I removed the outer shirt and used it as a bandage to wrap around the wound on my foot and stop the bleeding. I also felt as though I had pulled muscles in my legs, as my calves were very sore and it was very hard to walk. Because my foot hurt and was still bleeding, I went to a nearby clinic to get treatment.
11. I walked slowly for about twenty minutes until I found a clinic. When I got to the clinic, the nurse refused to give me treatment. They told me they were instructed by the government not to treat MDC supporters. Most of the clinics are government-run, so unfortunately this is common. I wondered if they had been warned by the Zanu-PF forces about the demonstration from earlier. I also realized that I was wearing my MDC t-shirt, as it was the shirt I had on underneath the shirt I had taken off to use as a bandage. I was clearly identifiable as a member of the MDC. Since I could not get any treatment for my wound, I left the clinic and took a bus home. My mom gave me some medicine and cleaned my wound and it healed up eventually, but I still have a noticeable scar on my foot.
12. I later learned from my friend that many of our Mazwi colleagues were injured when the police forcibly broke up our peaceful demonstration. She even said people might have been killed. She herself was injured, but I'm not sure how seriously.

13. I stayed at home, hiding, after the incident. I was afraid to go outside for any reason, including school. On my birthday, I was home alone when I heard the door open and saw two soldiers come inside. They didn't say anything. I was terrified, and I started crying and asking for my mom. They slapped me in the face and told me to be quiet. They tied my hands behind my back and took me out of the house. I believe they were members of the Green Bombers, because of their uniforms. They had guns with them, but this time did not use them on me. They put me in the back of a windowless armored-style truck, alone. The two soldiers sat up front. We drove for a few hours. When we arrived I found out that I was at a National Youth Reorientation training camp called Dadaya, in Zvishavane.
14. When I first arrived, they shaved my head. All the young men and women at the camp had their heads shaved. Then they gave us uniforms to wear, which consisted of khaki shorts and a shirt. We slept in a big tent, with all the women in one tent and the men in another. We slept on the ground, with blankets to keep warm. We were given little food and water during the training and it was very sporadic. Some days we might get three meals, on other days maybe only one meal.
15. The first week at the camp, I participated in training with other youth recruits. It was basically like a military camp. We would run, jump, and do exercises. We sang Zanu songs and chants. If you stopped running or doing whatever exercise, you were beaten. I was able to keep up, but some people weren't and they were beaten. After I had been there for a week, during an exercise a soldier told me to step aside. He took me over to a different area of the camp.
16. I was taken to a small cell and locked in, alone. The room was empty and bare, except for one small window which provided the only light. I had no bathroom facilities,

running water, or other amenities. I remember that it was night when I was placed in the cell. After I had been alone in the cell for a few hours, I heard footsteps heading toward the room. I felt very afraid.

17. I heard the chains on the door being unlocked. Many soldiers came into my cell; I think there were eight of them. They tore my clothes from me and I quickly realized that they were going to rape me. I tried to fight back, but there were too many of them. There were soldiers holding my hands and my legs to stop me from struggling, while other soldiers climbed on top of me and raped me, repeatedly. I felt so hurt and violated; I had been a virgin before I was raped. Eventually, the soldiers left. I cannot remember how exactly many raped me, but there were many.

18. Soldiers continued to come into my cell the following days. Some days, soldiers would come in more than once a day, almost always multiple soldiers at a time. I have no idea if it was the same men, or different ones. It was so dark in the cell that I could not see very well. I was raped at least daily for the next two weeks.

19. I was locked in the same cell, alone, with little food and water the entire time. When I did get food, it was just small bits of dry cornmeal or beans. The water was always dirty, if I got any. I had no place to go to the bathroom. Eventually, I stopped having to go the bathroom. I felt very weak. I had headaches constantly, and I was always crying. I was very sick at this time. Eventually, soldiers came into the cell, put me on a gurney and took me to a hospital. At this point, I was very weak.

20. Two soldiers rode beside me, and two were up front driving. It was around midday when they left me at the hospital. I was on a bed in a hall with many other patients. I slept a little bit. When I woke up, I realized I needed to escape or I would eventually have to return to the camp. I decided to escape through the bathroom. Usually, hospital

- bathrooms have large windows which can be used as emergency exits. I went to the end of the hall, entered the bathroom, and snuck out the window, which was at ground level. I saw a big blue truck parked nearby and hid in the back, behind the high sides. After a few minutes, I heard the owner come back to the truck and then the truck started moving; he hadn't even noticed I was in the back.
21. The truck drove for a few hours, and then stopped. When the driver got out, I decided to stop hiding and so I stood up. He seemed surprised, but as I explained my situation and told him what had happened to me at Dadaya, he became very sympathetic. He gave me some men's clothing he had with him as I had been wearing a hospital gown over my torn camp clothing. He drove me to a bus station and gave me some money so I could go to Masvingo to stay with my grandparents.
22. It took a few hours by bus for me to reach Masvingo. I went there to stay with my mother's parents (my grandparents) because it was not safe for me in Harare. I was certain the Zanu forces would be looking for me since I had fled the hospital. I arrived in Masvingo at the end of 2006. I remained in Masvingo, with a few brief trips to Harare, until I left Zimbabwe in 2008.
23. After I had been at my grandparents for a few months, I learned that I was pregnant as a result of the rapes I experienced at Dadaya. In 2007 I gave birth to my son Mike at my grandparents' house in rural Masvingo. Mike and I continued to live in Masvingo, with my grandparents.
24. I still felt very angry and traumatized by what had happened to me. I continued to live in fear of the government authorities finding me. I was afraid that I would be jailed again, beaten or raped, or possibly worse or even killed if they did find me, since I had run away from the hospital. I decided that I had to leave Zimbabwe to be safe.

25. In 2007, I had to write my A level exams in order to graduate from school. The only place I could do this was my school in Harare. My uncle Louis Taderera, my mom's only brother, came to Masvingo and drove me back to Harare. I was nervous the entire trip, and lay down beneath blankets in the back of the car each time we went through a checkpoint or near any government officials. I stayed at his house in Marlborough for a few weeks while I did the exams. I only went to school for exams and then back to his house. When I had completed my exams, he drove me back to Masvingo.
26. My uncle then agreed to help me apply to university in the United States, as a way to get out of Zimbabwe. I needed my uncle's help because where I was living in Masvingo, we lacked electricity and phone service and so I couldn't get the applications or complete them very easily. I had to walk into town in order to call my uncle or anyone else. In 2007, my uncle helped me submit an application for a visa to the U.S. Embassy. He also helped me apply to schools, and later that year, I was accepted to Dickinson University in North Dakota.
27. I made another clandestine trip to Harare for my visa appointment at the U.S. Embassy in 2007. I was initially issued a visa to go for Fall Semester 2007, but it was too unsafe and I couldn't leave the country. My family had been under surveillance, including my uncle, and he couldn't risk driving out to Masvingo or taking me to the airport so my enrollment was delayed.
28. In 2008, I made my final trip to Harare. Again, my uncle drove out and picked me up. When it came time for me to depart, I was very scared and nervous. My uncle came to Masvingo to pick me up. I dressed in a disguise, of sorts. I covered my head with a scarf, wore large glasses, and a long, bulky skirt. As we drove from Masvingo to Harare, I lay

down on the car seat, covered in blankets so I would not be visible to the police at road blocks. We made it though to Harare without incident.

29. I went to the U.S. Embassy and got my visa issued, then stayed with my uncle in Marlborough for a few days before I left. We went to the airport, and I went through security at the airport without incident, and boarded an evening flight to Johannesburg, South Africa. I flew from Johannesburg to London, and then to Denver, CO.
30. In 2008, I spoke with my mom. She told me that my grandparents, who I had lived with in Masvingo, had been killed by Zanu-PF supporters. Apparently, Zanu-PF soldiers told my mother in person about her parents' death, and also threatened that I would be killed in the same way if I came back. My mom indicated that my grandparents had been killed because they sheltered me.
31. I also learned that at the end of 2008, after I left, my uncle Louis who helped me escape was jailed and subsequently died. I never learned for sure how he died. My mom also thought he had been jailed for assisting me.
32. I learned that my younger sister Marie was beaten. Marie is also an active member of the MDC. My mom told me about the incident on the phone, but did not give many details because she is afraid the phones are tapped. As a result, Marie fled to South Africa and is currently living there. My mom also told me that our house was burned down.
33. My mom, my son Mike, and my three other siblings have been moving around Zimbabwe because it is too dangerous for them to stay in Harare. I'm not sure where they are now. The last time I was able to talk with my mom was in 2005.
34. I am afraid that if I had to return to Zimbabwe, I would become a victim of the government's oppressive techniques again. The repeated rapes that I suffered were very traumatic, and the idea that I could suffer that harm again, or possibly even worse

torture, is terrifying. I became more convinced of the real threat against me when my grandparents and my uncle were killed because they assisted me. I believe I will be harmed or killed if I return to Zimbabwe because of my family's anti-governmental political beliefs, and my own support of the MDC and Mazwi as well as my escape from the government-run military training camp.

I swear that the above statement is true and correct to the best of my knowledge.

Signed:  Dated: 1/1/2009

Subscribed to and sworn before me this
1 day of Jan, 2009


Notary Public