

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
[CITY, STATE]**

IN THE MATTER OF [REDACTED] (RESPONDENT)	IN REMOVAL PROCEEDINGS A# [REDACTED]
--	--

**DECLARATION OF [REDACTED]
RESPONDENT'S MOTHER**

Introduction

1. My name is [REDACTED], and I am a lawful permanent resident. [REDACTED] is my son, and [REDACTED] and [REDACTED] are my daughters. [REDACTED] has lived with me since 2001 when [REDACTED] and his sisters, [REDACTED] and [REDACTED], came to the United States to live with me.

[REDACTED]'s Early Childhood in Sierra Leone

2. I met [REDACTED], the father of my three children including my son [REDACTED], in 1977 when I was 16 years old. We became a couple when I was 17 years old. Our first child, [REDACTED] was born in [REDACTED] 1978. Our only son, [REDACTED], was born on [REDACTED] 1982. In 1984 our last child, [REDACTED], was born.
3. Although we were never married, [REDACTED] was the most loving partner, and he loved our children more than anything. He would do anything for them. Our life together in Sierra Leone was full of happiness. He let me do whatever I wanted to do. When he worked, I would pick up his paycheck, he would never ask how much he got paid. I would deposit it and pay the children's building. Every morning he would leave money for the children's lunch. We talked often of how we wanted to give our children a better life.
4. For over 12 years, he worked as a security guard at the U.S. Embassy [REDACTED] until the embassy closed in 1997. He would work long hours. Once he got off his day shift at the Embassy, he would go the Ambassador's residence to protect it. He was often away from home. He would be the first to leave in the morning. He would come back late at night to work. Everyone at the Embassy loved him, even the Ambassador. The Ambassador loved [REDACTED] so much, that he invited me to a party at his residence. While [REDACTED] was a security guard, I worked as a nurse.
5. In 1985, when my son [REDACTED] was 5 or 6 years old, I traveled to [REDACTED] to attend my uncle's funeral. Before I went, I talked to [REDACTED] about the possibility of me staying there. We agreed that I should go there to live with the hopes that I would send for the children. We

thought that this was the way we could provide a better life for our kids, including [REDACTED]. While I was away in [REDACTED], I stayed in contact with my children through their father and a neighbor, named [REDACTED]. [REDACTED]'s son [REDACTED] and my son [REDACTED] were really close and went to school together. [REDACTED] loved [REDACTED] as her own daughter and kept her during the day. During this time, my oldest daughter [REDACTED] went to live my cousin [REDACTED] in the [REDACTED].

6. In [REDACTED] 1987, I left [REDACTED] because [REDACTED] fell ill with malaria. While her father told me to stay in [REDACTED], I returned to Sierra Leone when I learned [REDACTED] was hospitalized at [REDACTED]. I remained in Sierra Leone for a year and a half until [REDACTED] was recovered. Before I left [REDACTED], my cousin [REDACTED], invited me to live with her in the United States. I talked this over with [REDACTED], and we agreed that I should go, and once I was settled I would try to bring the children the U.S. when I could. Because [REDACTED] was always working, I worried what would happen to the children if I left. I talked to [REDACTED] and asked her to adopt my children and keep an eye on them. So in the summer of 1989, we started the process to have [REDACTED] adopt my children. We found an attorney and I signed all the papers. The adoption did not become final until some years later.
7. I chose [REDACTED] because my Aunt who lived in front of me, she was sick and her husband had just died. My cousin [REDACTED] lived [REDACTED]. [REDACTED] loved [REDACTED], [REDACTED], and [REDACTED]. Their son [REDACTED] and my [REDACTED] grew up together, they were always in her house. She seemed like the perfect person to adopt my children and to look after their safety while I was away. When she adopted them, she did not have a U.S. green card or any legal U.S. immigration status.
8. In the meantime, [REDACTED] and I made arrangements where she would keep [REDACTED] and [REDACTED] during the day and at night they would return to their father's home to sleep. Although their father did not like the arrangement at first, I thought this would keep my children safe, especially because the war was getting worse in the provinces. My daughter, [REDACTED], continued to live with my cousin [REDACTED], until [REDACTED] and her U.S. Citizen husband left Sierra Leone for the United States. When [REDACTED] left, [REDACTED] went to live with [REDACTED].
9. While I was still in Sierra Leone, I applied for a tourist visa to go the United States. After I applied for the visa, in the summer of 1989, I went to [REDACTED] to visit another cousin, who lived in [REDACTED]. Although, they did not have a home telephone, I continued to stay in contact with my children through telephone calls to their father at the U.S. Embassy or my friend [REDACTED], who had a home telephone. In 1990, [REDACTED], my ex, called me and told me that I had an interview with the U.S. Embassy for the tourist visa. I returned to Sierra Leone in [REDACTED] 1990 for the interview, and after the interview and obtaining the visa I traveled back to [REDACTED] to wait for my cousin [REDACTED] to send me a ticket to the United States. Because the ticket did not come, I reapplied for the tourist visa in [REDACTED] 1991. And on [REDACTED] 1991, I finally came to the United States. [REDACTED] was 9 years old.

My Reunion with [REDACTED]

10. In 1992, the civil war intensified and reached [REDACTED] with the coup ousting the president. It became hard to reach my children and their father. I would call [REDACTED] at the Embassy to talk to him and my friend [REDACTED] who had telephone in her home. But for a couple months, there was no telephone line into Sierra Leone; and if I was lucky to get a line they were not there. My friend [REDACTED] told me "it was hard to get rice and no sellers would come to the market." But she told not to worry about my children because their father would get rice from embassy. I asked [REDACTED] to talk to them and tell them to stay out of streets. It became difficult to speak directly to them. Around this time my cousin [REDACTED] was planning to come to the United States with her U.S. husband. Her husband refused to bring [REDACTED] with them, so I told to [REDACTED] to go to [REDACTED] and [REDACTED]'s home to live.
11. Though the war was intensifying, I felt reassured that their father and [REDACTED] were taking care for children. I would send money for their clothes, school fees, and food, as well as packages with toys, clothes, and other necessities, to my children as often as I could. I made sure that [REDACTED] and [REDACTED] did not have to financially support my children, although [REDACTED] had adopted them. Only after I reunited with my children, I learned that [REDACTED] used my children to do the housework while her children did nothing. [REDACTED] refused to do the chores and would run to my aunt's house, which was opposite their father's home. [REDACTED] and [REDACTED] would dutifully do the housework. To this day, my daughters and son refuse to talk about how horribly [REDACTED] treated them, even though it affected them.
12. In 1997, I applied for Temporary Protected Status (TPS), and continued to renew it until it expired in 2004. In 2008, I received my lawful permanent residence. Before I received my green card, I asked around in my community if there was a way for me to bring my children to the United States. People said no because I did not have a green card or U.S. citizenship. I never went to an immigration lawyer because any extra money I had I sent to Sierra Leone for my children's care.
13. While I was in the United States, I started working at a nursing home owned by [REDACTED]. I worked at this nursing home for 15 years, and during this time [REDACTED] and I became great friends. I only stopped working there because [REDACTED] sold the business and moved to [REDACTED] AZ.
14. When my children traveled to [REDACTED], their father did not come with them because he had three other children with two other women in Sierra Leone. Eventually he died in Sierra Leone; I believed that he had kidney problems because the last time my children saw him over an Internet phone call, his face, stomach, and foot were swollen.
15. Around this time, [REDACTED], [REDACTED]'s husband, applied for the U.S. diversity visa lottery, and he was selected. [REDACTED] told me that her husband had won the lottery, and I was hopeful that I would see my children soon. [REDACTED], [REDACTED], their two biological sons, their adopted daughter [REDACTED], and my three children, traveled to [REDACTED] for the interview at the U.S. Embassy. Instead of bringing my children and Esther into the interview, [REDACTED] and [REDACTED] made them sit on a bench outside the embassy.

16. A couple of days after the interview, I was talking to [REDACTED] on the telephone. My boss and friend [REDACTED] was listening in the background. I mentioned to [REDACTED] that I would need to get the money together to buy their plane tickets to the United States. [REDACTED] confessed that my children did not get a visa like her, [REDACTED], and their two sons. She lied and said that consular officer told them that there were too many children on the application and she should come to the United States first and then applied for them. I didn't believe her and I told her "I paid for their rent in [REDACTED], their visa fees and the medical examination, but why the officer wait until the interview to tell them this." America loves children and adopted children are treated like biological children. If it was good for you and your family to leave Sierra Leone, why would just leave my children there."
17. [REDACTED], who was also the financial sponsor on [REDACTED]' visa application, overheard my angry and frustrated words. She then said "That is a lie, America would not choose biological children over adopted children, and force you to leave adopted children behind. Adopted children get the same rights as biological children. It was because of [REDACTED]'s kids that I was your financial sponsor. [REDACTED] is my best friend. You better bring her kids here or I will call immigration and withdraw my financial sponsor. You better bring these children over here."
18. Luckily, my children and [REDACTED] were listed as refugees with the International Rescue Committee. All of four of them came here as refugees in 2001. Although [REDACTED] wanted my children to live with her in Ohio, I refused to let her have my children, because she almost left my children over in Sierra Leone. My children did not want to live with [REDACTED]; they wanted to be with me.
19. When [REDACTED] came to the United States he was 19 years old. He entered the 10th grade at [REDACTED] High School because he was not at the same grade level as other kids his age. He did well in school his first year, and during the 11th grade, he got A's and B's and even the honor roll once. When he first came to US, he said that he wanted to be a lawyer and take care of me.
20. I never asked any of my children, including [REDACTED], about the war and their life with [REDACTED]. When [REDACTED] became a U.S. citizen, she was no longer in my children's lives. Once we were reunited, I did not want to live in the past. I truly thought if we focused on the future, everything would be ok.

[REDACTED]'s Psychological and Criminal Issues

21. [REDACTED] was no longer the friendly and jovial boy I knew in Sierra Leone. Though he was still friendly, he was now quiet, and had a temper. Even though he is quick to get angry, he has never hurt himself or anyone. [REDACTED] seemed stressed out after we were reunited.
22. Because I hadn't been in [REDACTED]'s life so long, I felt that I could not discipline like a normal mother. When I would push him to do something, he would get upset. He would think that he was already grown up. I was working 4 jobs at time to support them, and I was hardly around. It was hard to keep track of everything.

23. I noticed another change in [REDACTED] during his senior year. He started hanging out with the wrong people. These friends persuade him to leave school. His grades started to go down. His teacher even called me; the teacher said that [REDACTED] was a smart kid but hanging out with the wrong crowd. He told me to talk [REDACTED]. He would go with his friends and drink. One time I smelled alcohol on him and asked him why was drinking. [REDACTED] would tell me that [REDACTED] would leave the school. I talked to him, and luckily he turned things around and graduated.
24. After graduating high school, he started at [REDACTED], Virginia when he was 22 years old. Because he did not have a car, he would take a bus and then the metro to his classes. I could not afford to buy him a car. He often would not go. Instead he would sleep in and invite his friends over. They would smoke marijuana and drink alcohol in my house. [REDACTED] would often catch him and his friends drinking and smoking at home.
25. He quickly dropped out of [REDACTED] and he never told me. He sold the laptop that the school gave him and sold it to a friend. He continued to smoke and drink with his friends at my house, after I would leave for work. So I kicked him out of house the first time. His criminal history is because he hung out with the wrong crowd. He knows now that he needs to do better, so that he fix his life and support his two sons.
26. He continued to act strangely. Every time he would drink or smoke, he would talk to himself. [REDACTED] noticed that he would sing and laugh to himself. He would play loud music in his room. I also noticed him laughing by himself. I had a conversation with him after he came from prison. Even when you are talking to him, he would laugh at things that were not funny. I ask him "why are you always thinking everything is funny?" He said that he was thinking about something. I asked him why he laughed like that. He said "sometimes he would hear people would talking to him in his brain." He heard voices. The other strange thing is that he put the picture of his father in a casket by his bed. And he would often stare at it.
27. Worried about him I took him to [REDACTED] hospital; this was 4 or 5 years ago. After that he did not get any psychological or psychiatric treatment. I did not force him to get treatment. I thought if he let go of the past and pray, God would solve everything.
28. [REDACTED] tells me "You was the most important person in my life, after my kids. I did not know I would do if you were not around. But I am mad at you." He said, "When I came to you, you were not paying attention to me. You paid more attention to [REDACTED] and [REDACTED] than me." I told him that he was wrong. He said "Did you ever ask me how my life way when you were not around. My father did a lot of things for us, but we needed you. He did not talk much about you." When he says these things to me, it just breaks my heart.

The Humanitarian Crisis [REDACTED] Would Suffer if He Returned to Sierra Leone

29. If [REDACTED] had to go to Sierra Leone, I am afraid he would not survive. He has no family in Sierra Leone or [REDACTED]. Because of the civil war, my family was torn apart. I am not sure where my brothers and my stepdaughter are. I went to Sierra Leone in 2010 to search for them, but I could not find them. They could be in [REDACTED] or [REDACTED], but I am not sure. So

there is no one who could help John if he went there. The only family he has there are his half siblings, whom I am financially supporting, because they lost their parents. I pay for their schools, food, and clothing. I hope to adopt them in the future and bring them to the United States.

30. He would have no place to live, because his family home was bombed and is no longer there. Most places are being rebuilt, but someone else owns the land and buildings. He would not have a job, because there are countless people with education with any work. Most people are trading goods in the market. If [REDACTED] went to Sierra Leone, I would have to support him financially.
31. Also he would not get adequate medical or mental health treatment there. People cannot afford to the doctor. Public hospitals cannot take care of people. There are no therapists like in the United States. If a sick person does not have money, he will die. Medical issues are not good over there. Before a doctor starts treatment, the patient has to pay. People with mental illnesses go crazy in the streets until they die. Their families try witch doctors to help their mentally ill family members, but if the witch doctors cannot cure them, the people just go crazy and would walk the street. I am afraid that [REDACTED] would end up that way if he went to back to Sierra Leone. I fear for his life if he has to go Sierra Leone.

The Hardship to Our Family if [REDACTED] Returned to Sierra Leone

32. If [REDACTED] goes to Sierra Leone, his two sons would be devastated. He loves his children more than anything. He is very close to them, especially the oldest one, [REDACTED], who lives in [REDACTED], because he can see him more. The youngest son lives in [REDACTED] VA. He supports them financially whenever he can. Because he is detained, I am supporting them financially, but it is very difficult for me to support everyone I am supporting.
33. [REDACTED] would be devastated if [REDACTED] left. [REDACTED] and [REDACTED] are the closest. If he has any problem, he immediately goes to her. It is the same for [REDACTED]. I would be emotionally devastated if he had to leave. I would be afraid for him. I am afraid that he would hang out with the wrong crowd in Sierra Leone and start stealing because he could not support himself. Stealing in Sierra Leone will get one killed.
34. I would also be affected financially. Because it would be impossible for him to get a job in Sierra Leone, I would have support him. I am current financially supporting so many people right now. Five people besides me live in my home: [REDACTED] and her two children, [REDACTED], and, granddaughter (my stepdaughter's child). [REDACTED] is working and going school, but she lives in my home. [REDACTED] is going school, and she was out of work for a long time. She only recently got a job at [REDACTED]. I pay for most of [REDACTED]'s school fees. And like I said above, I am supporting the three half-siblings of my children in Sierra Leone, as well as [REDACTED]'s children here.
35. I currently work two jobs; I am an LPN and I work at [REDACTED] and [REDACTED]. But I barely make enough to pay my bills and support my family. My house is in foreclosure, but I am working to obtain a loan modification and to reduce my water bill rate.

I put the house in [REDACTED]'s name, just in case anything happens to me. I would save money to become a U.S. citizenship, but I cannot save the money. If [REDACTED] had to return to Sierra Leone, I would be in worst financial straits because I would have to support him fully. Here, I think he will at least have the chance to get a job again and have an income.

36. I hope and pray [REDACTED] is allowed to stay in the United States. He now knows that he must turn his life around, get psychological and psychiatric treatment, and find a job. All he wants to do is support his sons and be a good father. He would do anything so that he could stay with his children. I would gladly invite him into my home and help him get his life together. I would encourage him to get treatment. I feel that all the time apart from John, all those years, I am still making up for that time. I need the opportunity to be close and united to my son in the future and that will only happen will him here in the United States.
37. My son is a good and friendly person. All of our neighbors know him and like him. Before his detention, he would help me with my granddaughter and walk her to the school bus. He deserves a second chance in the United States, because if he returns to Sierra Leone he would suffer and his family here would suffer without him.

Immigration law frequently changes. This sample document is not legal advice or a substitute for independent research, analysis, and investigation into local practices. This document may be jurisdiction-specific or reflect outdated practices or law. CLINIC does not vouch for the accuracy or substance of this document and it is intended rather for illustration.

Under penalty of perjury, I affirm that the information contained within this declaration is true and correct to the best of my ability.

Respectfully Submitted,



Date