**Warren Craig NON-DETAINED**

**Human Rights First**

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**Texas State Bar No.: 24092294**

**Licensed in Texas only**

***Pro bono* counsel for Respondent**

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**LOS ANGELES, CALIFORNIA**

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**In the Matter of: )**

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**)** **File No: A**

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**In Removal Proceedings )**

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**Immigration Judge:**

**Individual Hearing:**

**RESPONDENT’S UPDATED NEXUS STATEMENT**

**In Re:**

**Respondent A#:**

**RESPONDENT’S UPDATED NEXUS STATEMENT**

The Respondent, through *pro bono* counsel at Human Rights First, respectfully submits the updated statement grounds on which he is seeking asylum and withholding of removal.

The Respondent is seeking asylum and withholding of removal on account of the following particular social groups:

1. Belizean individuals who cooperate with law enforcement and whose cooperation is public in nature;
2. Witnesses who testify against gang members in Belize;
3. Belizean individuals who take concrete steps to oppose gangs;
4. Former employees of the Belizean government;
5. Current and former government employees engaged in anti-gang activities in Belize; and
6. Community organizers in Belize.

Additionally, the Respondent is seeking asylum and withholding of removal on account of his actual and imputed political opinion based on his community anti-gang activism as a government employee and mentor of at-risk youth in Belize.

Respectfully Submitted,

Date: March 3, 2023 /s/ Warren Craig

Warren Craig

Supervising Senior Staff Attorney

Human Rights First

**CERTIFICATE OF SERVICE**

**In Re:**

**Respondent A#:**

I, Warren Craig, certify that a true and correct copy of the following, specifically described document(s): **RESPONDENT’S SUPPLEMENTAL DOCUMENTS IN SUPPORT OF FORM I-589 APPLICATION FOR ASYLUM, WITHHOLDING OF REMOVAL, AND CAT PROTECTION, TABS G-H** was properly served on the ICE of the DHS on March 3, 2023, by e-service to:

Department of Homeland Security

ICE

Office of Chief Counsel

606 S. Olive St, 8th Floor

Los Angeles, CA 90014

Date: March 3, 2023 /s/ Warren Craig

Warren Craig

Supervising Senior Staff Attorney

Human Rights First