

February 5, 2015

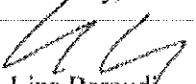
Dear Honorable Judge Gershwin Drain,

I am writing to request leniency from you in the March 12 sentencing of Rasmea Odeh, who I know as a community leader and ally. I am the immigration attorney at the Arab Resource and Organizing Center's Arab American Legal Services in San Francisco, California, and have a long history of community involvement and activism through AROC, its predecessor (the American-Arab Anti-Discrimination Committee of San Francisco), and the Arab Women's Solidarity Association of San Francisco.

As an Arab-American immigration attorney who has assisted hundreds of clients in naturalization applications, all of whom did not speak English as a first language, Ms. Odeh's case has been of great interest to me personally and professionally. Based on first-hand experience, I can represent to the Court that the majority of naturalization applicants misunderstand the question on the application for naturalization relating to prior arrests and convictions – almost all of my clients understand the question as being exclusive to a criminal history in the United States. This is understandable because other immigration applications, such as the application for asylum, specifically ask whether the applicant has a criminal history in “any country other than the United States.” Similarly, the application for adjustment of status (for a green card) asks whether the applicant has a criminal history “in or outside the United States.” As demonstrated by Ms. Odeh's case, it is a common, understandable, and devastating mistake. In fact, since this case, I have been even more diligent in advising clients that, despite its vagueness, the application for naturalization is requesting information about their criminal history outside of the U.S. as well as within.

Your Honor, I have also represented innumerable clients who have suffered torture and severe persecution, including multiple Palestinians who endured indescribable sexual and physical abuse in Israeli prisons based on extremely questionable arrests and convictions within the Israeli judicial system. From my personal experience, I know that interaction with any law enforcement, as well as further incarceration, in the United States re-traumatizes these victims. As I have seen with my own clients, I strongly believe that the isolation Ms. Odeh withstood while incarcerated was a great hardship and may have retriggered her Post Traumatic Stress Disorder. As with other survivors of torture, Ms. Odeh's continued engagement with her community – the people who rely on her – is critical to her emotional well-being. I respectfully urge you to consider allowing her to continue being a productive and respected community leader who has so generously devoted her energy and time to hundreds of Arab and Muslim immigrant and refugee women in Chicago.

Sincerely,


Lina Baroud
Attorney at Law

lina@araborganizing.org

DEFENDANT'S
EXHIBIT
C-34