

Please see Mikey's attached Green Card and Guardianship documents granting Dennis custody of Haoyu.

4. As demonstrated through this Affidavit and attached detailed corroborating evidence, I believe that the instant I-131 establishes:

- There are urgent humanitarian or significant public benefit reasons for me to be in the United States; and
- That I merit a favorable exercise of discretion.

5. As stated by my husband in his attached sworn and notarized Affidavit:

“I have an urgent need for a heart procedure, which will require at least 3 days of hospitalization. I am at risk of dying without this procedure. I have delayed this procedure, because I am the sole caretaker of our five-year-old son, and as a “single parent” without any other support to raise the child, I am concerned that my son will end up in foster care either during my hospitalization, or after, in the event that I do not survive.”

CASE HISTORY

6. My husband and I married in China on April 26, 2019. Please see attached. This is the first and only marriage for each of us. We lived together in China, with Mikey, for nearly two years before we were married.

7. My husband and I filed I-130 petitions for me and my son. My son received his immigrant visa on September 24, 2021. Please see attached.
8. My immigrant visa was denied on December 10, 2019, by the U.S. Consulate in Guangzhou, China, based on the following:
- INA 212(a)(2)(A)(I)[crime involving moral turpitude]
 - INA 212(a)(2)(A)(II)[controlled substance violation]
 - INA 212(A)(2)(C)[controlled substance trafficking]
9. **The Embassy Denial letter, which is attached hereon, also states that no waiver is available for INA 212(a)(2)(C).**
10. The denial letter did state that I may be eligible for a waiver of the first two grounds of inadmissibility and provided information on how to file the I-601 waiver.
11. I filed the I-601 waiver on December 20, 2019. On August 8, 2020, the waiver application was denied, stating that there is no waiver available for INA 212(a)(2)(C), and that I did not qualify for a waiver under INA 212(a)(A)(II).
12. On May 21, 2021, I filed an I-131 Application for Humanitarian Parole with USCIS- Humanitarian Affairs Branch, **pro se, without the benefit of legal counsel.** On July 15, 2021, USCIS denied the request for parole, stating:

“You have failed to establish by a preponderance of evidence that there are urgent humanitarian reasons or significant public benefit reasons that would justify a favorable exercise of parole the beneficiary.

You have failed to establish by a preponderance of evidence that your request warrants a favorable exercise of discretion to parole the beneficiary”

13. The denial indicated that I was entitled to file an I-290B motion to reconsider/reopen, which was done on August 11, 2021.
14. In support of the I-290B, **which I filed pro se, without the benefit of legal counsel**, I submitted substantial new and material evidence of are urgent humanitarian or significant public benefit reasons for me to be in the United States.
15. In November, 2021, Dennis had to move back to the U.S. because of serious and urgent medical issues that could not be properly treated in China (he has serious and complex cardiac problems, outlined below). My son, whom Dennis has been raising as his own son, came with him to the U.S. Dennis and I decided that it was not safe for Mikey to grow up in China, and that the safest place for him was with Dennis in the U.S.
16. On February 4, 2022, USCIS denied the I-290B, stating that the I-290B did not establish new facts (which is not accurate), nor did it

establish that the decision was based on an incorrect application of law or Service policy. Please see attached.

17. The I-290B decision ignored the plethora of new documentation and evidence that establishes:

- the severity of Dennis' medical condition as evidenced by records supplied by his doctors,
- the medical records that demonstrate the real possibility that Dennis will be incapacitated or become deceased due to his medical condition, thereby rendering Mikey to be without a parent in the U.S. (and there is no U.S. family member available in the U.S to care for him which would mean he would end up in foster care at great risk to him and great expense to U.S. taxpayers);
- the serious health impact on Dennis being separated from the care and love of his wife
- the medical evidence from Mikey's pediatrician on the negative impact on his development due to separation from me
- the detailed and credible claim by me that I am a person of good moral character, and that I did not commit the offense described in the records and that I was the victim of an abusive boyfriend, who exploited me, and that I am the victim of a corrupt and abusive totalitarian regime in China.

18. We have now retained Attorney Richard T. Herman to help us better understand the legal requirements of humanitarian parole and to assist us in presenting a new I-131/I-134 application.

**I DID NOT COMMIT THE CRIMINAL
OFFENSE DESCRIBED AND I AM NOT A
DANGER TO THE U.S.**

19. On June 9, 2015, I was convicted of Drug Trafficking 1.16 grams of heroin in Dafang County, China. I was sentenced to 8 months in prison and fined 1000 RMB. On November 19, 2015 I was detained at the Dafang County Detention House in Guizhou Province, and on February 24, 2016, I was released. Please see attached records.

20. Please note that the following is true and accurate:

- I did not commit any criminal offenses related to narcotics in Dafang, or anywhere else. I was set-up by my then-boyfriend, who physically abused me, and stashed drugs in a shoulder bag without my knowledge;
- That my admission to the drug offense in Court in Dafang County was not voluntary, that I was detained for over 12 hours by the Chinese police without food, or contact with family or attorney, while I was pregnant and pressuring me to confess. The Chinese police unlawfully extracted a confession from me, and that without the confession, I was afraid what they would do to me. The Chinese Government is known for longstanding human rights abuses, such as torture, by those detained by the Chinese government.
- Based on this fear, I confessed to a crime that I did not commit. The Chinese Police wrote the

statement and I signed it---- I was not permitted the opportunity to consult a lawyer. After I signed it, I was given a cell phone to call my parents. My parents immediately came to the police station and took me home, while I waited for my court date.

- I was on home surveillance until the baby was one year old. Then I reported to a women's correctional facility and served 3 months before I was released.
- My husband and I have talked with numerous lawyers in China to see whether it is legally possible to file a motion to vacate my coerced guilty plea based on duress or other human rights ground. Despite extensive outreach to law offices, we were unable to locate ANY lawyer in China who would take on this case. They all claimed it was futile, and possibly dangerous, to make a claim that agents of the Chinese government violated my human and legal rights.
- I do not want my son to be raised in a country like China, which tortures and kills its citizens without regard to constitutional rights like those enjoyed in the U.S. It pains me terribly to hear him cry for his mother, but we believe we made the right decision to keep him safe in the U.S.

MY HISTORY WITH ZENG LIN, MY ABUSIVE EX-BOYFRIEND, THE REAL DRUG TRAFFICKER

21. I understand that it is not uncommon for criminals to claim that they are innocent. However, I hope that after you read my detailed story, that you will believe that I am a victim, and not a perpetrator.

22. In October 2013, I worked as a part-time cashier in a hotel in Dafang County, Guizhou Province. It was also my hometown and birthplace. One day, I was eating in a restaurant and met a man named Zeng, Lin. After knowing each other for a while, we fell in love with each other. With the consent of both parents, we cohabited. Two months later, I found that I was pregnant. I resigned from my work and became a housewife.

23. When I was 3 months pregnant, Zeng, Lin changed a lot. He often didn't come home and didn't work. Every time he went out it was for at least 3 days, and sometimes for 12 days. When Zen Lin went out, he would turn off my cell phone every time; blacklisted my parents' phone numbers, including those of my relatives. Every member of my family couldn't find him. I couldn't stand his behavior. I wanted to confront him. But every time I talked with him, he will admit his mistake for being away from home for so long, apologize, or even be angry and hit the wall. If I don't forgive him, he will either threaten to commit suicide, swear, or sometimes hit me.

24. One day, Zeng Lin left for 12 days, and returned home at 8:00 in the morning. I asked him where he had been for so many days. I told him that if the next time you don't come back, I will call the police and tell

the police that you are missing. He was very angry. He said that he was tired and didn't sleep for a few days. I didn't want to ask him anymore, because he had a bad temper. If I kept asking, he would yell at me, and **I worried he would hurt me.**

25. Zeng Lin walked into the bedroom, I closed the door, and I went to the supermarket to buy vegetables. At about noon, I cooked the meal. I went to the bedroom and asked Zeng Lin to get up for dinner. His cell phone rang, and I heard him say, "I haven't slept for a few days. I'm very tired. I'll ask my girlfriend to give it to you later."

26. Zeng Lin hung up the phone. He told me not to eat first, but to go and give a shoulder bag to his friend, and he is going to give you 100 yuan that he borrowed from him.

27. My boyfriend, Zeng, Lin, gave me his cell phone. I didn't argue or ask questions. I didn't want to fight with Zeng, Lin. When I left the house, the cell phone rang and it was Zeng, Lin's friend. He told me where to meet him. When I met him, the boy took a cigarette box out of the shoulder bag, and a black plastic bag that was in the cigarette box. Then the boy put the box back in the shoulder bag and gave the shoulder bag back to me with the 100 yuan my boyfriend lent him.

28. When I turned around to leave and go home, the police confronted me and grabbed my hand and took me to the police car. The police began to get rough with me, and put me in handcuffs. The police took my belongings and searched the shoulder bag. They took the box my boyfriend gave me, his cell phone and my cell phone. I asked the police what is going on and why they are putting me in handcuffs? The police said my boyfriend was selling drugs. The police kept pressuring me to take them to my boyfriend Zeng Lin. The police said I wasn't a target that they wanted my boyfriend. The police told me if I take them to my boyfriend that I would not be arrested. I rode in the police car to where we lived. But Zeng Lin's mother told the police that he had left and didn't know when he would be home.

29. **It was because my boyfriend Zeng, Lin wasn't apprehended that I was taken to the police station and interrogated relentlessly. I was put in confinement. I was not allowed to call my parents, and I was not allowed to have a meal for over 12 hours. I was pregnant and this was extremely hard on me.**

30. I do not know any lawyers, nor do my parents if I was allowed to call. But the police confiscated my cell phone and my boyfriend Zeng Lin's cell phone. **The police would not allow to use the phone in the police**

station. The police were pressuring me to confess. I was not going to confess to something I did not know was taking place. The police insisted that if I confess, that there would not be a severe punishment.

31.I could not take any more of the intense pressure. I was mentally drained, and tired. I gave the police what they wanted. I agreed to everything they were saying to me as the police wrote the report. I was scared of would happen to me if I didn't tell the police what they wanted me to say.

32.After the report I was given my cell phone to call my parents. My parents immediately came to the police station. My parents fought with the police, and at one point my father was almost arrested. The police told my parents to take me home. I left my boyfriend and was living with my parents. I had a court appearance and was sentenced to 8 months in a women's correctional facility, and 1000 yuan fine.

33.I was on home surveillance until my baby was one year old. Then I was to report back to the police department. I reported back when my baby was one year old, and the police took me to the women's correctional facility to serve only 3 months. I was released.

34. I hate my ex-boyfriend Zeng, Lin for doing what he did to me. I had no knowledge of any of this. He used me as a pawn for his secretive illegal life. As far as I'm concerned, he needs to rot in prison for the rest of his life. I know he has ruined my life.

THE RECORD DEMONSTRATES, BEYOND A PREPONDERANCE OF EVIDENCE, THAT THERE ARE URGENT HUMANITARIAN AND SIGNIFICANT PUBLIC BENEFIT REASONS FOR THE ME TO BE IN THE UNITED STATES; AND THAT I MERIT A FAVORABLE EXERCISE OF DISCRETION.

35. In addition to my statement, and In support of the instant I-131/I-134 application for Humanitarian Parole, please find the attached documents which establishes Urgent Humanitarian Need, Significant Public Benefit and Equities Warranting Favorable Exercise of Discretion:

- Sworn and Notarized Affidavit by my husband, attesting to the urgent need for me to be in the U.S. with my son and ailing husband
- February, 2022 Letter from Dr. Wojciech Mazur of Christ Hospital, Heart & Vascular Center:

“Mr. Dennis Geier is currently a patient of mine and is dealing with a **complex medical condition for which he recently had cardiac surgery and is dealing with complications** of procedure. He is also **raising his 5-year-old son and needs assistance with both childcare and medical care.** It is my understanding that his wife is currently in China and working on getting a visa to the United States. If this process can be expedited at all, it would be very beneficiary to my patient and his medical care.”

- January, 2022, Letter from Dr. Vanshipal Puri, MD, Mercy Health:

“Dennis J. Geier 9/20/1954 is noted to be at **high risk for a cardiac event based on symptomatic presentation and medical diagnosis of coronary artery disease.** **It is my recommendation the patient undergoes cardiac catheterization requiring hospitalization at the soonest availability.** **Urgency is deemed necessary in account that the parent is a parental guardian at this time and will need spouse present to assist with care of child during his hospitalization**”

- February, 2022 Letter from Michael S. Yi, MD, The Christ Hospital:

“**Haoyu Zhang was seen in my clinic on 2/21/2022 to establish care. He has been in the country without his biological mother for an extended period due to immigration related barriers. As a pediatrician, I am very concerned this will have a negative impact on the development and mental health of this young child. As such, for those reasons, efficient processing of her immigration is necessary to help healthy development of this child in the long term.**”

- January, 2022 letter from Patrick Owens, Pastor of Fairfield Church of God in Fairfield, Ohio:

“Several years ago, I served as pastor to Dennis Geier It became essential for he and his on to move prior to the wife/mother while awaiting her approval to follow them.

Dennis, himself, had and continues to struggle with health/heart issues that are best treated here in the U.S. with Drs familiar with his health history. Currently his physician feels he has a life-threatening issue and has directed him to go in the hospital for a minimum of 3 days or risk dying. Either scenario leaves him in a position, as a single parent, of not having his spouse and co-parent present to care for their child.

Even under the best circumstance, without his wife present, the child is at risk of entering state custody when he has 2 parents who love him and are capable of providing a safe and loving home environment. ...

While child services is an important service: **1.) Child Services burden would be lightened if this situation and others like it were addressed by expediting helping qualified, willing safe parents jointly parent their children; 2.) The known stress and traumatic impact of unnecessary separation from the family unit of a small child and his parents would be avoided; 3.) the likelihood /risk of a child entering the system and being lost to both parents unnecessarily will be avoided. #3 is a real possibility if dad is hospitalized or dies with the mother present.**

Dennis has put his health and life at risk, awaiting this decision.”

- Dennis’ medical records

- Pictures of my husband, son and myself, and our family together

36. As a result of my husband's medical condition, and separation from me, particularly at this time of need, and with the stress related to being a single parent at age 67 of a young child, who misses his mother terribly, I believe that Dennis is suffering from severe anxiety and depression, panic insomnia, and panic attacks. The stress of this situation, particularly as he is delaying his urgent medical procedure, is overwhelming and causing extreme hardship to him and our son.

37. It is also causing Dennis extreme hardship to think about our five-year old son. Medical evidence suggests that should he stay separated from his mother for any extended time, he would be at risk of the development of separation anxiety disorders, depressive symptomatology, and symptoms of isolation.

38. Furthermore, as outlined above, it is not possible for Dennis to relocate to China. It is also not safe for Mikey to live in Communist China.

39. I believe I am a good person, possessing good moral character and integrity. I would not do anything to bring shame to my family name. Other than the case mentioned above, which I believe to be bogus and

the result of a predatory abusive boyfriend, and a corrupt China government that routinely violates the human rights of its citizens, I have no criminal convictions or arrests.

40. My attorney informs me that without the USCIS exercising its discretionary authority to grant her parole, I will be ineligible to enter the U.S. **forever**.

**My U.S. Citizen Husband and Permanent Resident Minor Son
Will Suffer Extreme Hardship Should I Be Denied
Humanitarian Parole.**

41. The prospect of my permanent bar from entering the U.S. seems an unimaginable outcome and penalty based on the facts documented herein. I recognize that it will result in extreme hardship for husband if I am permanently barred from the United States. More importantly, it will be an extreme hardship for our five year old son. Without humanitarian parole, there is no path forward.

CONCLUSION

42. I believe the record contains substantial evidence of the following corroborating evidence; I believe that the instant I-131 establishes:

- There are **urgent humanitarian or significant public benefit** reasons for the me to be in the United States; and
- That I merit a **favorable exercise of discretion**.

43. Based on the foregoing, I respectfully request that you grant the instant I-131 application for Humanitarian Parole

44. Thank you in advance.

I declare under penalty of perjury that the above declaration is true and correct to the best of my knowledge and recollection.

FURTHER AFFIANT SAYETH NAUGHT.

Executed this 10 day of June, 2022 in Guiyang, Guizhou, China.

Zhang Yi Mei 张业梅
Yi Mei Zhang

Sworn and subscribed before me this 10 day of June, 2022, in Guiyang, Guizhou, China

Zheng Juan 郑娟
Notary Public