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**350-6259**

15th of November, 2013

Honourable Mr. Gary Griffith

Ministry of National Security

Temple Court

321-33 Abercromby Street

Port of Spain

Dear Honourable Minister Gary Griffith

**Re: Consideration of Application to Quash the deportation Orders/ Issue Voluntary Departure Notices of SHUAI FENG WU**

This office has been retained to act on behalf of the above mentioned Chinese national, who has been issued deportation orders following the conclusion of special inquiries conducted at the immigration investigation department #135 Henry Street, Port of Spain on 14th of Novermber, 2013 by Mr.Kenny Seenath , Special Inquiry Officer. This order has b een appealed since under s. 26(5)

Bearing in mind the powers reposed in your office, such an appeal under Section 26(5) can allowed, dismissed or the decision of the Special Inquiry Officer be quashed. Of significant import is the fact that there may exist humanitarian and compassionate factors that warrant special relief pursuant to 28 (1) (b) (ii).

**The History of the Stay of Mr. Shuai Feng Wu.**

Mr. Wu came from republic of China, from #29 Jinlong Village, Guangdong Province, into this Country on 24th of October, 2003 and was given a permit to stay for a period one month, and was extended for a period of Nine months.

He has relatives living in #28 Silver Mills Street, San Juan who agreed to sponsor his stay in Trinidad. He remained in this Country Illegally after the expiration of the certificate of stay granted to him. The reason being of his misinformation that he could obtain a permanent residency status after he stays here for 5 years or more.

He came here with his wife Ke Hong Li. He gave birth to two Children after he came here, namely Sui Qing Wu, who is five years and Yi Dong Wu who is one and half years old. Later his wife left him because of some domestic differences. He brought up the Children with the support of the Trinidadian relatives. He was not employed as he could not get any work permits. His Trinidadian relatives however, did not mind supporting him since he used to help them with the house hold chores. Since he got attached to them so much they did not want him to leave this Country.

He has funds in the Republic in China where he would be able to establish a business in this Country and also would be able to give employment to the nationals of Trinidad and Tobago.

**Reasons for the appeal**

The Immigration Regulations provides under s**28.** (1)

*(b)* in the case of any other person who was not a

resident at the time of the making of the order of

deportation, having regard to—

(i) the existence of reasonable grounds

for believing that if execution of the

order is carried out the person concerned

will be punished for activities of a

political character or will suffer unusual

hardship; or

(ii) the existence of compassionate or

humanitarian considerations that in the

opinion of the Minister warrant the

granting of special relief,

the Minister may direct that the execution of the

deportation order be stayed, or may quash the

order and direct the entry of the person against

whom the order was made.

This case is definitely a case that warrants your compassion. There are two children who are the citizens of Trinidad and Tobago and hence warrants the protection of our Constitution who would have to leave this Country if the order is carried out and would have to adopt to different environment other than Trinidad. The appellant has been living in Trinidad and have been acclamatised to our culture. If the order is carried out he would have to reestablish himself in a different environment. this would be extremely difficult and hence warrants your compassion on the basis of s.28 of the immigration regulations.

1. Would he taking our citizens employment? Certainly not. He affirms that he would be/ have plans in establishing a business in this Country and contrary would be giving employment to Citizens of Trinidad and Tobago.

In these circumstances I implore your kind self to quash the order made by the Special Inquiry Officer and permit him to voluntarily depart so that he could regularize his papers.

Yours faithfully

Christopher Ross Gidla

Attorney at Law

C.c to Chief Immigration Officer