

months after Celine's individual hearing. He found Celine credible, and agreed that she had proven a wellfounded fear of persecution in Rwanda on account of multiple protected grounds. However, he denied her asylum because he speculated that she had not told the truth in obtaining the visa she used to come to the United States to accept the award for the genocide survivor's organization, and granted her only withholding of removal¹⁵.

Withholding of removal was not an acceptable form of relief for Celine. It meant that she would be unable to ever legally petition for her stepdaughter and her sister to come to the United States to join her. Even worse, it meant that she would probably never see them again. Because of Celine's situation, it would be unlikely that her stepdaughter and sister would be granted United States nonimmigrant visas to come to visit her¹⁶, and Celine could not leave the United States to visit them in some safe third country without ex-

15. Withholding of removal is a fear-based form of immigration relief with a higher standard of proof and fewer benefits than asylum—that is available to some who are barred from asylum eligibility or denied asylum in an exercise of discretion. It results only in a relatively tenuous legal status with no direct opportunity to make that status more direct or secure; an individual granted withholding is ordered removed but physical removal (deportation) to the country where the individual fears persecution is withheld. For a more detailed discussion of withholding of removal, and the differences between withholding and asylum, see *infra* text accompanying notes 42-53.

16. Nonimmigrant visas typically require proof of intent to stay only temporarily in the United States and to return to one's home country at the end of the period of authorized stay. See INA § 214(b); 8 U.S.C. § 1184(b) (2006); 8 C.F.R. § 214.1(a)(3)(ii) (2010); 22 C.F.R. § 41.11 (2010). Celine's stepdaughter and sister would have a very difficult time as a practical matter proving their intent to return to Rwanda after a visit to the United States because of Celine's presence in the United States as the result of a fear of persecution in Rwanda in combination with Celine's uncertain legal status in the United States.

cuting the order of removal against her and risking being unable to return to the United States. Celine would be stuck in limbo, able to remain in the United States only if the United States government was unable to deport her to some country other than Rwanda, but unable to apply for legal permanent residence or citizenship here.

Because of these very severe consequences, Celine chose to appeal the denial of asylum. While Celine's appeal was ultimately successful, she did not receive a final decision until almost two and half years after the immigration judge initially issued a decision. During that time, Celine remained in the United States alone, separated from the only family she had left and struggling to support herself without authorization to work. Unfortunately, Celine passed away shortly after receiving the final decision in her case. Because of the delay caused by the immigration judge's discretionary denial of her claim to asylum, she was never able to bring her family to the United States.

RESEÑA

Cultura de los Derechos y de la Ciudadanía

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Producto de una capacitación con jóvenes de la localidad suroccidental del distrito de Barranquilla y en el marco de la investigación denominada Políticas Públicas de Convivencia y Cultura Ciudadana en el Suroccidente de Barranquilla, y del Observatorio de culturas de la localidad antes mencionada, el autor elabora esta cartilla cuidadosamente redactada, clara y sencilla, dirigida a las comunidades para el ejercicio de la democracia local y la formación de una cultura de los derechos y la ciudadanía.

La portada del libro está ilustrada con una pintura de Alex García titulada: "Homenaje al Hombre Caimán", *in memoriam* de Alfredo Correa De Andreis. Sus páginas interiores están motivadas con poemas y fotografías de Ruvén Darío Mejía.

El libro consta de siete breves capítulos en donde expone el conjunto integral de los Derechos Humanos establecidos en los Pactos Internacionales y la Constitución Política colombiana. En cada capítulo hay lecturas referidas al tema y talleres de comprensión de lectura como ejercicio pedagógico y didáctico.

Los tres capítulos iniciales ofrecen los ante-

cedentes y conceptos de los Derechos Humanos, un contexto histórico, su clasificación en derechos civiles y políticos y los Derechos Económicos, Sociales y Culturales (DESC).

El capítulo cuarto trata sobre los derechos de los pueblos o de solidaridad, en continuidad con los DESC, los que se complementan con el de Libre Determinación de los Pueblos que es fruto del proceso de descolonización luego de la Segunda Guerra Mundial.

El capítulo quinto aborda los instrumentos de protección de los Derechos Humanos a nivel internacional y nacional. Internacionalmente destaca al Consejo de los Derechos Humanos y al Alto Comisionado para los Derechos Humanos de la ONU, y la Corte Penal Internacional.

Finalmente, los capítulos sexto y séptimo introducen la problemática de la cultura ciudadana y la interesante propuesta de la Ciudad Educadora, cómo tejer la participación ciudadana en contextos socioeconómicos deprimidos y de pobreza.

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