

DECLARATION OF BIANCA DOE

I, Bianca Doe, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I was born in Santa Rosa de Copan, Honduras in 1996. I am 22 years old. I have three brothers that I have lived with. They are 18, 19, and 8 years old. They are in Honduras, living with my mother and stepfather. My stepfather is a farmer. My mother cares for the children. My biological father left my mother when she was pregnant with me – he has many other children who are my half siblings but I don't have a relationship with most of them, nor with my biological dad.

3. I went to school through elementary school. I stopped going to school at the age of 11 because my stepfather didn't want to pay for my education and my mother lacked the funds to keep me in school. I can read and write in Spanish.

4. In Honduras I worked as a cook in a restaurant for about three years.

5. I identify as a woman and a lesbian.

6. I left Honduras on September 10, 2018 because my life was in danger. Because of my sexual identity as a lesbian, I was targeted by men in Honduras, and

threatened that I would be killed if I did not leave. There is no protection in Honduras for people like me. In Honduras, LGBTQ people like me are harmed and disappeared all the time because the government and police do not protect us. In fact, the police often target sexual minorities because of their minority status.

7. I fled from Honduras alone to save my life. I travelled north through Guatemala; the passage took me a couple of days.

8. I wanted to reach the United States so that I could be safe from discrimination and violence on account of my sexuality. Also I know that I have a better chance of getting my son back because the laws in the United States are stronger than here in Mexico.

9. I arrived in Mexico in September and stayed in Tabasco for three months. I had no intention of staying in Tabasco – I just wanted to save up enough money to come to get to the U.S/Mexico border.

10. I found it really hard to find a job in Tabasco because of discrimination against people from Honduras. People would say that we are dirty, unreliable, other ugly things that are just not true. I would try to explain that not all Hondurans are the same, that I like to work, and that I work hard. I am an experienced cook and server. But people would say that they were not hiring Hondurans. That happened to me many times.

11. Luckily, I finally found work in a bar. I knew some women who

worked there, and they helped me get the position. But I was afraid to mention that I am a lesbian and I did not reveal my identity the whole time I was in Tabasco. I heard lots of people in Mexico say hateful and frightening things about LGBTQ people, calling them names like fag and dyke and saying that we are trash. I heard people say that gay people like me are less than human, and that it is okay to hurt us because we don't matter. Because of my sexual identity, I do not feel safe in Mexico.

12. While in Tabasco I was robbed. A man of about thirty years of age grabbed my bag when I was eating at a café. They stole my identity card from Honduras, my phone, and my documents. As a result, I had to go back to the Mexican border to obtain a replacement visa.

13. I left Tabasco around the 15th of December; I arrived in Tijuana on or around the 20th of December, 2018.

14. When I arrived in Tijuana, I stayed at a shelter. I am now staying at an LGBTQ safe house here in Tijuana.

15. The day I got here, I put my name on "La Lista" or The List, and got my number.

16. I waited over five weeks on The List.

17. It was Tuesday, January 29, 2019 when my number finally came up.

18. I got to the port of entry around 9:00 am. When we arrived at El

Chaparral, U.S. officers put us in cars and took us to another place. They directed us to get into lines and leave all of our suitcases. They gave us a bag to carry our documents and nothing more. We were allowed to keep the clothes we were wearing, but that was all.

19. I had with me a letter from my attorney requesting exemption from the “Migrant Protection Protocol” because I am a lesbian facing discrimination and persecution in Mexico, and a G-28 form indicating that my attorney is Cristian Sanchez. My attorney also gave me an index of documents regarding country conditions in Honduras to hand to the officers. Two U.S. immigration officers looked at the documents and told me that I could not take them with me. I had to leave them in my suitcase, which they took then took away from me. The immigration officials only allowed me to bring copies of my visa that I had obtained in Tabasco, and a copy of my birth certificate. I put all of the information my attorney gave me in my suitcase and did not see it again until I was processed to leave the port of entry.

20. After taking our things away, the immigration officers took me to a room, where I stayed for the rest of the day. They took down my information and took my fingerprints. I was there until about 4:00pm, I think. There were many officers.

21. They then separated me from others in the processing room and

separated people into different “hieleras” or ice boxes.

22. The ice boxes are small rooms where many, many people are held. Nearly everyone is sitting or lying on the floor because there are not enough seats. I was given a tiny, very thin mat to sleep on, along with an aluminum emergency “blanket.” The room was very, very cold. It was impossible for me to rest.

23. I was held in the ice box from the time I left the first processing room until about 1:00 am. I ate very little – a dry burrito in the morning, a sandwich, and a cold hamburger later – and was given only water. My stomach hurt, and still does, from the food they gave us and the stress.

24. During my time in the ice box, there was constant activity so I never slept. I was woken up at all hours for showering, people mopping the floor, meals and announcements for people’s other business, like interviews.

25. An immigration officer came and got me at 1:00 am. He took me to a large room where many other people were being interviewed. I could not understand him because he could barely speak Spanish. He really struggled to understand me, which is why, I think, in the record of my interview includes so many errors. Upon information and belief, the officer’s name was Alonzo Brooks; that is the name on my documents, and I saw him sign a document that had his name on it.

26. No one explained to me what the interview was about or why it was

happening. Officer Brooks just called my name in the ice box and said, “come with me.”

27. When I got to the interview room, he asked me to raise my hand and swear that I would tell the truth.

28. Officer Brooks then said he was an immigration official. He was wearing a badge, but I don’t remember what it said.

29. I could hear the tone of voice of the other immigration officers; many of them were nearly yelling at people. Thankfully, the immigration officer who did most of my interview was respectful.

30. The interview lasted over an hour, less than two hours.

31. Officer Brooks explained to me that he would not decide my asylum claim. He said that a judge would decide my asylum claim.

32. The interview transcript attached to my Notice to Appear contains many errors and does not accurately reflect what I said during my interview.

33. The U.S. immigration officers did not give me the transcript to review. They only gave me the “Protocolos” document only after the interview, attached as **Exhibit A**. I had to sign something that I later learned stated that I understood what I was signing, but the only document they gave me to read at the time was the “Protocolos” document in Spanish. I only saw the interview transcript and the Notice to Appear after the fact. The officers did not offer translations of

any documents other than the “Protocolos,” that was written in Spanish.

34. The officers gave me a list of attorneys who are not in California; they are in other parts of the country. I don’t have the resources to work with attorneys that far away. The officers never offered me the chance to show the letter from my attorney or his G-28 form.

35. The immigration officers did not tell me I was going to be sent back to Mexico. They also did not explain how I was supposed to re-enter the United States or get to the court on the day of my hearing. They did not give me contact information for my consulate or offer me a chance to talk to them. All they said was that a judge would decide my asylum claim.

36. When I read the Protocolos document, I understood that I was going to be sent back to Mexico. I was terrified because I don’t feel safe here.

37. After the interview, the officers took me back to the ice box. I remained there until around noon on the following day, when they took us to a room with only two tables. There were so many people there, including children, such that hardly anyone could sit while eating, including me.

38. Then they took me to another room and they asked me what color my suitcase was they gave me my suitcase back.

39. The U.S. immigration officials then put me in a car with about eight other people. They took us back out of the port of entry and delivered us to Grupos

Beta in Mexico. Grupos Beta gave us a 51-day visa to stay in Mexico and then took us out of the port of entry and back out to where The List is. I ended up just where I had started.

40. By that point, I was exhausted and hungry. As I left the port of entry, there were many reporters. I felt terrible and wasn't ready to talk to them, so I just kept walking. I went to the LGBTQ safe house where I had stayed before.

41. I am not sure how my attorney will be able to help me if I am staying at temporary safe house in another country. I am alone and I also fear for my safety when I leave the safe house because the border zone is very dangerous, particularly for women and members of the LGBTQ community like me.

42. I fear that the Mexican authorities will send me back to Honduras. When I finally crossed the U.S.-Mexico border, Mexican immigration officials told me that I had entered the country in an illegal manner and that my stay would be temporary. Right now, I only have 50 days or so left on my temporary visa. I know I am not welcome here. The Mexican officials make this very clear in the way they have interacted with me.

43. I suffered a lot in Honduras. The father of my child raped me, and I became pregnant. He told me that he did this because I am a lesbian and love women. I was a virgin at the time.

44. I love my son, and I did everything I could to provide for him. I

worked hard and made enough money at the restaurant to support us. But the father of my child sued for custody and won. He said that my son would grow up to be a “fag” and that a lesbian would only raise a gay son, and he couldn’t have that.

45. When we went to the Court, the judge said that, because of my sexual orientation, I am not a fit mother and would not raise my son correctly. I was only allowed visitation every fifteen days. When my family found out that I was a lesbian, they supported my son’s father in the custody battle. I haven’t been able to speak with my four-year-old son in many months.

46. My mother, my stepfather, and my brothers all rejected me when they found out that I was a lesbian and in love with a woman. The only person I have is my son, and the judge took him away from me because of who I am, because of my sexual orientation. My family even helped the man who raped me take custody of my only child.

47. I was in a relationship with a woman in Honduras. The father of my girlfriend in Honduras was very abusive and is homophobic. When he discovered our love, he beat her. On my last day in Honduras, her father took us to a location close to the Honduras/Guatemala border. He parked the car and threatened me that unless I left Honduras, he would kill me and that he would also kill my partner, his daughter. I had no choice but to leave. I got out of the car and walked across the

border right then and there.

48. In Honduras, if you are a lesbian, you may as well be dead. Because of the threats I received from the father of my girlfriend and the father of my son – the man who raped me – I was terrified that I would, in fact, lose my life. The Honduran government does nothing to stop violence against women and the LGBTQ community. I was completely alone, and fled to protect myself.

49. Given the harm I have suffered in my country, I fear that if my identity and my status as an asylum applicant are released to the public, my life and possibly that of my son will be in danger. I also fear future discrimination against me for my sexual identity and personal history. I wish that my identity not be publicly disclosed, and I wish to proceed with the use of a pseudonym or initials in any federal action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on February 3, 2019 at Tijuana, Mexico.

BIANCA DOE
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CERTIFICATION

I, Mayra Lopez, declare that I am fluent in the English and Spanish languages. My first language is Spanish and for the past three and a half years I have worked in a legal services office in the United States, preparing court documents, doing oral and written translations, and serving multi-lingual clientele.

On February 3, 2019, I read the foregoing declaration and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 3, 2019 at Tijuana, Baja, Mexico.



Mayra Lopez

EXHIBIT A

Protocolos de Protección del Migrante
Información de Procesamiento Inicial

- Usted ha sido identificado para procesamiento bajo los Protocolos de Protección del Migrante y se le ha expedido un Formulario I-862, Citatorio (NTA, por sus siglas en inglés), para procedimientos ante una corte de inmigración, donde podrá solicitar todas las formas de alivio de inmigración disponibles bajo la Ley de Inmigración y Nacionalidad. Cumpliendo con las leyes de los Estados Unidos, incluso la sección 240 de la Ley de Inmigración y Nacionalidad y la implementación de regulaciones, un juez de inmigración determinará si usted es sujeto a remoción de los Estados Unidos, y en caso de serlo, si es elegible o no a alivio o protección de remoción. Aunque usted podrá buscar ese alivio o protección bajo los mismos términos y condiciones de cualquier extranjero, en los procedimientos de la sección 240, de acuerdo a las leyes de los Estados Unidos, usted será devuelto a México y no podrá intentar entrar a los Estados Unidos hasta que regrese al puerto de entrada apropiado en la fecha de su audiencia ante un juez de inmigración.
- La NTA, proporciona la fecha y hora de su primera audiencia ante un juez de inmigración en los Estados Unidos en la corte identificada en su NTA. En la fecha de su audiencia, usted debe presentarse al puerto de entrada SYS PED West, localizado en EL Chaparral, en la fecha y hora listada más abajo. Si su caso no puede completarse en una sola audiencia, la corte de inmigración le proveerá una Notificación de Audiencia en Procedimientos de Remoción, que indica la fecha y hora de cualquier audiencia subsecuente.
 - Usted puede llamar a la corte de inmigración al teléfono 1-800-898-7180 para obtener información de su caso las 24 horas al día, los 7 días de la semana. Si está llamando desde fuera de Estados Unidos, usted debe marcar 001-880-898-7180.
- Usted debe llegar al puerto de entrada listado arriba a las [REDACTED] el [REDACTED] para asegurarse de tener tiempo para ser procesado, transportado a su audiencia y para que pueda reunirse con su abogado o representante acreditado (si usted hace arreglos para ser representado durante sus procedimientos de remoción). El Gobierno de los Estados Unidos le proporcionará transportación desde el puerto de entrada designado hasta la corte el día de su audiencia. Si usted falla en llegar en la fecha y hora apropiadas, podría ordenarse su remoción en ausencia.
 - Al llegar al puerto de entrada designado para su audiencia, debe traer consigo la NTA o Notificación de Audiencia en Procesos de Remoción, así como cualquier identificación emitida por el gobierno y/o documentos de viaje.
 - Al llegar al puerto de entrada designado para su audiencia, debe traer cualquier menor o otro familiar que haya entrado a los Estados Unidos con usted y que recibieron una NTA para la misma fecha y hora.
- Usted tiene el privilegio legal de ser representado por un abogado o representante acreditado de su elección, que esté acreditado para ejercer la práctica de inmigración ante una corte de inmigración de los Estados Unidos, sin cargo al gobierno estadounidense.
 - A usted se le proporcionó anteriormente un Listado de Proveedores de Servicios Legales, la cual contiene información acerca de servicios de bajo costo o gratuitos de parte de los proveedores legales que practican cerca de la corte de inmigración donde su audiencia(s) tendrá lugar.
 - Un listado de los proveedores de servicios legales también está disponible en el sitio web de la Oficina Ejecutiva para la Revisión de Inmigración en <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers>
- Si usted elige ser representado, puede consultar con un consejero sin cargo al Gobierno de los Estados Unidos por medio de cualquier mecanismo que incluyen los siguientes, si aplica:
 - Usted puede consultar con su consejero por teléfono, correo electrónico, videoconferencia o cualquier otro método de comunicación remota de su elección.
 - Usted puede hacer arreglos para consultar con su consejero en persona en una localidad de su elección en México.
 - El día de su audiencia de inmigración, usted puede hacer los arreglos para una reunión en persona con su consejero en los Estados Unidos en la localidad de su corte asignada, previo a su audiencia.