

## DECLARATION OF ALEX DOE

I, Alex 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 am a citizen of Honduras. I am thirty-five years old. I have no criminal record.

3. I went to the San Ysidro port of entry to seek asylum on January 29, 2019 after waiting in Tijuana to seek asylum since December 2018.

4. I fled my home country because the gang Mara 18 tried to kill me because of my work as a youth pastor and organizer. After I survived an attempt on my life, the gang continued to target me.

5. As a pastor in Honduras, I worked with youth who are former or current gang members, or who are at risk of being forcibly recruited to join a gang. This outreach angers the Mara 18 because I discourage young people from joining them. I am also the president of a youth organization, where I worked with the U.S. Agency for International Development to organize actions for young people in my neighborhood in Tegucigalpa.

6. In November 2017, a member of Mara 18 pulled alongside me while I

was driving my motorcycle and pointed a gun at me. This caused a car crash that cracked open my skull. I was left bleeding and unconscious in the street, and the Mara 18 member left me there for dead.

7. After I survived Mara 18's attack, I helped organize a strike after the gang killed a young man who was a member of my church. I was featured on the national television news demanding that the Honduran government increase safety measures to stop the Mara 18's violence and drug sales. The Mara 18 threatened to kill me because of this organizing work. Because of the Mara 18's past attempt to kill me and the gang's escalating threats, I fled Honduras in fear for my life.

8. If I am sent back to Honduras, I am afraid that I will be killed by the Mara 18. I do not believe the government could protect me if I were to return to Honduras. I went to the police many times to file complaints about the threats against my life and the threats the Mara 18 poses to my community, but the threats and violence continued against me personally and against others.

9. I traveled to the U.S.-Mexico border to seek asylum with the migrant caravan. I first went to the San Ysidro port of entry on or around December 15, 2018. I had been told by a friend that I could not seek asylum immediately but had to put my name on a list and wait until my number was called. I waited around six weeks in Tijuana before my number was called and I could return to the port of entry to request asylum in the United States.

10. While I waited for my number to be called, I stayed at the El Barretal migrant shelter. El Barretal is a large concrete structure full of tents of migrants waiting to seek asylum. It is located very far away from the center of Tijuana, and the neighborhood around the shelter is very dangerous and well-known as an area controlled by drug-trafficking cartels. One night, someone threw a tear gas bomb into the shelter. Because of these factors, I was very scared while I was staying at El Barretal.

11. I also did not feel free to leave the shelter because of the presence of Grupos Beta and the Mexican federal police. All the donations that arrived at the shelter were organized and distributed by Grupos Beta, but we always lacked basic necessities like food and water. I felt like a prisoner in the shelter because of the presence of Mexican government officials and because of my lack of permanent immigration status. I saw lots of migrants who were deported from El Barretal while I was staying there. We believe they were deported because Mexican officials would make them turn over their Mexican visas and shelter identifications and take them out of the shelter, and the migrants would never return. I was afraid that I would be deported if I made any kind of mistake or came to the attention of the Mexican authorities.

12. A few days before my number on the wait list was called, Grupos Beta forced me to leave El Barretal and find somewhere else to live. That day,

Grupos Beta officers were checking people's possessions and saw that I had several tents. They demanded that I give them my extra tents. I refused to turn them over, since I had purchased them and planned to send them to Honduras for a youth ministry project. Grupos Beta then told me I had two hours to leave El Barretal. I had to scramble and ask a friend if I could stay with him for a few days.

13. Luckily, I knew that it was almost time for my number to be called. I had been going in person to El Chapparal every day for the previous few weeks because I knew my number was going to come up soon and I wanted to make sure that I did not miss my chance to request asylum. On January 29, 2019, my number finally came up. At 1:00 PM, Grupos Beta directed all of us whose numbers had been called to line up and turn in our Mexican visas. I did not have mine with me, but I saw one person in the group turn in a Mexican immigration document. Grupos Beta then drove us in a van to the port of entry.

14. At the port of entry, a U.S. immigration officer in a dark blue uniform asked who in the group was from Honduras. The officers then separated the Hondurans from the rest of the group and asked us if we were part of the caravan. There were about six of us, and we all said that yes, we had come with the caravan. The officers then told us to put our documents in plastic bags, take the shoelaces out of our shoes, and make sure we were only wearing one shirt and one jacket. We also had to turn off our cell phones and place them in our backpacks along



with our wallets. We then waited in another room, where an officer asked me for my name, my nationality, and if I was traveling alone.

15. We were then moved into another room. We all placed our backpacks in a pile on the floor. An immigration officer then asked me and two other Hondurans to move all of the backpacks into storage lockers. There, U.S. immigration officers in plainclothes, but wearing badges, told us that we were in the United States and therefore had to follow U.S. law. They also told us that we had to be respectful and remain silent during processing. Then the officers made us stand against the wall so they could pat down our clothes. One officer asked me if my tattoo meant that I am connected to a gang. I explained that my tattoo was an anchor with the initials of my wife and children, and that it has nothing to do with gangs.

16. We were taken to another waiting room. After about two hours, I was called to speak to an officer at a station at a long table. The officer took my fingerprints and my picture, and asked me my name, my age, and questions about my family. After that, I was told to wait yet again.

17. Around 7 pm, three other asylum seekers and I were taken to a hielera, where about 15 other people were already being held. I was given a thin mat and an aluminum blanket to use for sleeping. In the morning, we were taken out of the hielera and given a small breakfast. While I was eating, an officer called

me over and asked me for my full name, the names of my parents, if I was married, and if I had children. Then I was taken back to the hielera.

18. About an hour later, I was called to another interview with a male immigration officer in a dark blue uniform. The officer had me raise my right hand and promise to tell the truth. The officer asked me why I had left Honduras. I told him that I left because of persecution by gangs. The officer asked me who had told me to say that. I did not know how to respond because no one had told me to say that, so I remained silent.

19. The officer then asked me why I had not immigrated to another country besides the United States, like Panama, Costa Rica, or Belize, where, according to him, people do not try to come to the United States. He said something like "you Hondurans, Salvadorans, and Guatemalans are the ones who immigrate to my country because you know that there are better opportunities here, and look at the disaster that you have caused in Mexico by rushing the border. And now you want to come here and do the same thing to the United States, entering illegally and not respecting the laws of my country." I was very confused and hurt by the officer's statements, especially since I had waited my turn to ask for asylum. He also asked me who led the caravan. I told him that I did not know.

20. The officer then asked me why I had not brought my family with me, because they must have been danger in Honduras if I was in danger there. I tried

to explain why, but he did not give me a chance to fully answer his question.

When I tried to respond and explain, the officer told me something like, "you are only going to respond to the questions that I ask you, nothing more." This prevented me from providing additional information in the interview apart from the answers to the questions posed by the officer. The officer told me that I was going to lose my asylum case and be deported to Honduras.

21. After interviewing me, the officer told me I had to initial and fingerprint some papers, some of which were in English and some of which were in Spanish. The paper in Spanish said that I was being returned to Mexico. This is the first time that I realized I would be sent back to Mexico instead of staying in the United States to seek asylum. While I was reviewing this paper, the officer who interviewed me told me to read it out loud to another asylum seeker because that asylum seeker was also being returned but was illiterate.

22. I told the officer I did not want to sign documents in English because I did not know what they said. The officer told me that the documents summarized what we had discussed and that I had to sign them. After that, he told me that I had the right to a lawyer when I went to court and that I should look for one so I could fight my case. The entire interview lasted about 45 minutes.

23. I was never asked if I was afraid to return to Mexico.

24. After this interview, I was returned to the hielera, where I waited for

about an hour. Then immigration officers called me out of the hielera by name and took me to get my backpack. The backpack had been left on a table with migrants' bags. Then they put me back in the hielera. After about 15 minutes, they told me to line up with other people being returned Mexico. Immigration officers handcuffed us all with our hands behind our back, and had us carry our backpacks to the port of entry. Two immigration officers, a black man and a white woman, both in dark blue uniforms, then loaded us onto a bus.

25. The bus took us to El Chaparral, where the two officers took off our handcuffs, gave us some paperwork, and turned us over to a group of Mexican immigration officers.

26. I recognized several agencies among the group, including the National Institute of Migration (INM), Grupos Beta, and Derechos Humanos. The Mexican officers took all of us to an office. They asked where we were staying and if we needed a shelter or any transportation. They asked if we were hungry and gave us lunch.

27. An officer in plainclothes who looked like he was in charge asked us all to turn in our humanitarian visas. Most of us did not have our visas with us. The immigration officer told us that our visas were no longer valid because we had left Mexico and come back. Therefore, they were going to give us another immigration document, but this one would only be valid while we waited for our



immigration court dates in the United States.

28. I am afraid of being in Mexico. I know from personal experience and from the news that migrants have a bad name here and that many Mexicans are unhappy that so many of us are here. I have frequently been insulted by Mexicans on the street. When I first arrived in Tijuana, I spent some time in the neighborhood of Playas. But other asylum seekers and I had to flee Playas in the middle of the night because a group of Mexicans threw stones at us and more people were gathering with sticks and other weapons to try to hurt us.

29. Because I am a migrant here with only temporary immigration status, I feel that I am in danger and would not be protected by the Mexican government if I had a problem. I feel very visible because I have a Honduran accent and I look different from people in Mexico because of my skin color. I also have visible scars and injuries on my head and face from when the Mara 18 tried to kill me in Honduras. These scars make it obvious that I am an asylum seeker.

30. I am afraid that Mexican immigration officials or the Mexican police will deport me while I am waiting for my court date. I have seen them deport lots of immigrants from El Barretal for very small things. For example, I once saw Grupos Beta detain and take away a group of people when only one person in the group had started a fight.

31. I am also afraid that the Mara 18 will find me here in Mexico. I am

afraid that the Mara 18 might send someone to find me or get information from someone in the caravan. The Mara 18 has networks throughout Central America, and I have heard that their power and connections in Mexico are growing.

32. I do not know how I am going to prepare for my asylum case in Tijuana. I do not have any money to pay an immigration attorney, and I'm afraid that I will not even be able to find a U.S. immigration attorney while I am in Tijuana. I don't speak English, and I can't understand the forms that U.S. immigration officials gave me.

33. Given the harm I 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 family will be in danger. I wish that my identity not be publicly disclosed, and I wish to proceed with the use of a pseudonym 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 12, 2019 at Tijuana, Mexico.

Alex Doe  
Alex Doe


CERTIFICATION

I, Luis Guerra, declare that I am fluent in the English and Spanish languages.

On February 12, 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 12, 2019 at Tijuana, Mexico.

  
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Luis Guerra

02/12/2019  
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Date