

## DECLARATION OF CHRISTOPHER DOE

I, Christopher 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 Honduran citizen. I am 39 years old.

3. I have a first-grade education and don't know how to read or write Spanish. I have a hard time remembering and learning things because of a childhood head injury. I had to repeat the first grade around 7 times because of my learning disabilities.

4. I requested asylum in the United States at the port of entry near Tijuana, Mexico on January 29, 2019.

5. I fled my home country of Honduras around October 2018 because I was threatened with death due to my support of the LIBRE party. I was also attacked and discriminated against for being Garifuna and dark-skinned.

6. If I am sent back to Honduras, I fear that I will be hurt or killed because of my political opinions and for being Garifuna and dark-skinned.

7. I do not believe that my government could protect me. I was threatened with death by someone who works for the local government in Honduras government and who is very well-connected. The government in Honduras is very corrupt and only protects people with money.

8. I traveled to the U.S. border with a large caravan of migrants ("the Caravan"). We arrived in Tijuana, Mexico around November 2018. I wanted to seek asylum in the U.S. immediately, but I was told by Mexican authorities with Grupos Beta and other migrants in the

Caravan that I had to put my name on a waiting list. I was told that to put my name on the waiting list and receive a number, I had to go to El Chaparral and show my identification. I did that and received a number.

9. While waiting for my number to be called, I stayed at various shelters. I also had to sleep on the street for a few nights when I first arrived in Tijuana.

10. Living in the shelters was extremely hard. The sanitation was poor. The portable bathrooms weren't always cleaned so I had to find public bathrooms around town. I had no privacy and had to bathe in the open. It was very, very cold. I had to sleep in a tent made out of blankets. When it rained, everything got wet. I had to huddle together with other migrants to sleep. At one point, rainwater rose up to my waist. I got very sick for about a week. My whole body hurt with a fever. I had the chills, my head hurt, and my throat hurt. I lost more than 20 pounds or so because I could barely eat.

11. After the El Barretal shelter was closed, I had nowhere to go. Luckily, I met a kind person on the street who was able to provide temporary lodging. Although I had a place to stay, living in Tijuana was (and still is) hard. The Mexican police and many Mexican citizens believe that Central Americans are all criminals. They see my dark skin and hear my Honduran accent, and they automatically look down on me and label me as a criminal. I have been stopped and questioned by the Mexican police around five or six times, just for being a Honduran migrant. During my most recent stop, the police threatened to arrest me if they saw me on the street again.

12. I have also been robbed and assaulted by Mexican citizens. On two occasions, a group of Mexicans yelled insults, threw stones, and tried to attack me and a group of other Caravan members. I had to run and hide to avoid being beaten. I was also robbed at gunpoint

while I was walking to the store.

13. My number to seek asylum in the U.S. was called in January 2019. The morning of January 29, 2019, I went to El Chaparral to await further instructions. There, Grupos Beta transported me and a group of other migrants to the port of entry by van and dropped us off there. U.S. immigration officials separated the families from single adults, and the men from the women. They asked the men which of us had traveled to Mexico with the Caravan. I raised my hand, along with about 4 other men. The immigration officers separated us from the rest of the group.

14. The immigration officers gave us bags for our papers and belongings; asked each of us where we wanted to go in the United States and whether we had family there; and gave us each a ticket with the number of our belongings bag. Then they lined us up, asked us to put our hands behind our backs, and searched us. After that, they asked us for information about our identity and background, took our fingerprints, and took our photos. Finally, they gave us some food and locked us up in a cell with several other people.

15. We stayed in the cell overnight. Some people had been detained there for many days. We had to sleep on thin plastic tarps on the floor and go to the bathroom in front of everyone else. The air in the cell was stale, and I felt like I was being choked.

16. The next morning, we were given some food and a few of us were called out to do interviews. We were brought to a room where there were several cubicles in a row, each with an immigration officer.

17. My immigration officer was female. I don't remember her name, but she appeared white, tall, blond, heavy set, and about 40-45 years old. She didn't speak Spanish well, and I had a hard time understanding her. There were some points where I didn't understand her

at all. I don't think she really understood me either because she kept asking me to speak more slowly.

18. The officer interviewed me very quickly. I think my interview only lasted around 10-15 minutes. She acted impatient and angry. When I tried to answer her questions, she frequently cut me off saying "No!", like she wasn't satisfied with my answer or she didn't like what I was saying. This made me nervous, and I felt like she didn't want to listen to me. When I tried to tell her that my memory was poor due to a childhood head injury, she seemed not to care and ignored me.

19. The officer started by telling me that if I lied, I would be arrested and deported to Honduras. Then she asked me several questions, including my name, birthdate, where I was from in Honduras, when I left Honduras, whether I traveled with the Caravan, who the leaders of the Caravan were, and when I arrived in Tijuana. She briefly asked me if I was afraid of returning to Honduras and why, but she didn't let me go into detail. As I was telling my story, she would interrupt me with her next interview question, not allowing me to finish my answer.

20. She asked me how I had been treated in Mexico while traveling with the Caravan, but when I tried to tell her that we had been attacked by people throwing stones, she cut me off and moved on to other questions.

21. The officer didn't mention that I would be returned to Mexico at any time, and I don't remember her asking if I was afraid to live in Mexico while waiting for my asylum hearing. If she had asked, I would have told her about being stopped by the Mexican police and attacked by Mexican citizens. I would also have told her I am afraid that the people who threatened me in Honduras could find me in Mexico because when I was in Mexico City, I believe I saw one of the armed men who was monitoring my house in Honduras.

22. Near the end of the interview, the officer told me to sign some papers. All of the papers were in English except for one. The officer didn't explain the English papers to me or read them to me in Spanish, so I had no idea what they said. I didn't ask her to explain because she still seemed angry, and I didn't want to make it worse. The officer just told me to sign here, here, and here. When I told the officer that I couldn't write or sign my name, she told me I should just mark down my initials.

23. The officer gave me one paper in Spanish and told me to read it. When I told her I didn't know how to read Spanish, the officer made another migrant who was being interviewed next to me read it to me. He read the paper to me, but to be honest, I didn't really understand what the paper said. They made me sign it. I often have a hard time understanding things at first because I am a slow learner and have poor memory due to a childhood head injury. No other papers were read to me in Spanish and I didn't get a chance to read them until later, after I had been returned to Mexico.

24. Near the end of the interview, the officer told me I had a court date on March 19, 2019 and that if I didn't go, I would lose my case. She didn't say where the court was, where to present myself, or how I would get there. She had me sign some more paperwork in English and told me to find an attorney in Los Angeles. After that, I was returned to my cell.

25. While in my cell, some other migrants told me that I was going to be deported to Mexico. I didn't really believe them, though, because the officer who interviewed me didn't say anything about returning to Mexico, only that document which I couldn't read. While living in Tijuana, I had heard rumors that people seeking asylum in the United States could be deported to Mexico while fighting their cases, but again, I didn't believe it would happen to me because the officer who interviewed me didn't mention it at all.

26. Soon after, immigration officers called my name and several others. They took us out of our cells, handcuffed us to each other, and drove us in vans back to El Chaparral in Tijuana.

27. In Tijuana, Grupos Beta was waiting for us. Derechos Humanos was supposedly there too, but normally they wear white uniforms and the people present were in blue uniforms. Grupos Beta explained that our humanitarian visas from Mexico were no longer valid because we had requested asylum in the U.S. They gave us another document that they said was valid until our court date in March. They didn't really explain what kind of status or rights this document gave us while living in Mexico.

28. I am now living in Tijuana, waiting for my court date. I don't know if I have the right to work here or not, but either way, I am too afraid to work. Other migrants have told me that Mexican employers kidnap Central American migrants and kill them or extort their families in Central America for money. I am also afraid to walk outside because two or three days before I entered the United States, I was stopped by Mexican police who told me that I will be arrested if they see me on the street again.

29. I've been told that I should get an attorney to represent me at my court hearing, but I have no idea how I'm going to be able to find one living here in Tijuana. I don't know where to find attorneys in the U.S. or how to call them, and I don't have any money to pay them. I also have no idea how to prepare my asylum case, what evidence I need to collect, or what is going to happen in my March 2019 hearing. I am terrified of being deported in March and being killed in Honduras.

30. I am also concerned because there are errors in the interview that the U.S. immigration officer wrote. I did not know about the errors at the time because no one read the

transcript to me while I was in the U.S. But after I was returned to Mexico, attorneys read the interview back to me in Spanish. There were many errors and missing pieces of information in the interview transcript. For example, the U.S. officer got names, dates and details of my testimony wrong, wrote questions and answers down that she did not ask me, and wrote questions in a way that she did not communicate to me in Spanish.

31. Given the harm I experienced in Honduras, 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 identify 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 4, 2019 in Tijuana, Mexico.

" C. D. "

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CHRISTOPHER DOE


**CERTIFICATION**

I, Elana Gold, declare that I am professionally competent in the English and Spanish languages.

On February 4, 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 4, 2019 in Tijuana, Mexico.

A handwritten signature in black ink, appearing to read 'Elana Gold', written over a horizontal line.

Elana Gold