

DECLARATION OF GREGORY DOE

I, Gregory 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 53 years old.

3. I went to the San Ysidro port of entry to seek asylum on January 29, 2019. I had waited in Tijuana for my turn to present at the port of entry since approximately November 18, 2018.

4. I fled Honduras after receiving threats based on my support for the LIBRE party. After the presidential election in 2017, I began to participate in the widespread protests against the government. This brought me to the attention of the Honduran military, which began to follow me and even came to my house. In fear for my life, I fled Honduras in October 2018.

5. If I am sent back to my country, I fear that the Honduran military will find me and kill me. I do not believe my government would protect me if I were to return to my country because the Honduran military is part of the government.

6. I do not have a criminal record.

7. I traveled through Mexico with the migrant caravan. I arrived in

Tijuana on or around November 18, 2018. First I stayed at the Benito Juarez shelter, but heavy rains made the shelter so muddy that it was unusable, and we were moved to tents in El Barretal.

8. I did not feel safe at Benito Juarez because the neighbors kept trying to attack the migrant community. The people who lived near the shelter tried to hurt us because they did not want us in their country. On one occasion, a group of young men gathered around Benito Juarez with sticks, threatened us and yelled things like “get out of here, Hondurans, we don’t want you here.” They said that it was unfair that we were receiving benefits from the government.

9. At El Barretal, I felt a little more secure because we had a high wall surrounding us. Even so, one night someone threw a tear gas bomb into the shelter. When I tried to leave the shelter, people in passing cars would often yell insults at me like “get out of here, you *pinches* Hondurans,” and other bad words that I do not want to repeat.

10. In El Barretal, members of Grupos Beta instructed us to go to El Chaparral to put our names on a list in order to be able to seek asylum. I went and put my name on the list in November 2018 and received number 1828.

11. At the end of my time in El Barretal, the Mexican officers there started to get rough with us. I saw them take some of my friends out of El Barretal by force. I saw officers from Grupos Beta, Mexican immigration, and the federal

police tell people in the camp that they had to leave to look for work. The people who did not want to leave were kicked out of the camp by force; the Mexican officials simply picked up their tents and carried them out.

12. I am a dedicated Evangelical Christian and had been attending a church in Tijuana. Because people were being removed from the camp, I had to move into the church in December 2018. About fifty of us stayed at this church together. It was very crowded. We slept on mats on the floor, there was one bathroom for all of us and there were two rooms for us to sleep in.

13. While waiting for my number to be called, I tried to look for work in Tijuana. However, I was told in several places that I needed a Mexican passport in order to get paid.

14. On January 29, 2019, I arrived at El Chaparral around 8:00 am. My number was finally called. Several hours later, around 1:00 PM, officers from Grupos Beta put all of us in a line. They asked us to turn in our immigration paperwork from Mexico, but I had left my humanitarian visa behind for safekeeping.

15. Grupos Beta then turned us over to a group of U.S. immigration officers. The U.S. officers told us that we should be quiet, and that we would be detained for maybe months, or years, until our process was complete.

16. The officers had us put all of our possessions, except for the clothes

we were wearing, into our luggage and lined us up against the wall. They told us not to look around, and then searched each one of us. I had kept my glasses hooked onto my shirt because I need them to read. An officer grabbed my glasses from me. He looked like he might break them. I told him that I needed my glasses to read and he told me that they had to go in my bag. This worried me because I wanted to be able to read any paperwork that was given to me during the asylum process, especially any papers that I had to sign.

17. A U.S. officer then asked the group which of us had come with the caravan. This question made us all a little nervous because we were not sure why they were asking us. The officer said something like “don’t worry, nothing is going to happen to you, just tell us which of you came with the caravan.” So people who had come with the caravan identified ourselves. The officers then separated us from the rest of the group.

18. After this, I went to a short interview with an immigration officer who asked me some basic questions like my nationality, my family status, my name, and my contacts in the United States. Then I waited for a while in a waiting room before a different officer took my picture and my fingerprints.

19. Soon afterward, I was taken to a small cell. There were several people already waiting in the cell. Many of the people had been there for many days, so I spent some time praying with them in an attempt to give them hope in

this difficult time.

20. I spent all night in the “hielera,” or ice box as the migrants call it. The officers gave us aluminum blankets and thin mats for sleeping, but it was impossible to sleep because the lights were on. In the morning, I was not given anything to eat. Instead, an officer took me to a room with a lot of cubicles for another interview.

21. A male officer interviewed me in Spanish. He asked me to raise my hand and promise to tell the truth. He first asked me some biographical questions.

22. Then he asked what had happened to me in Honduras. I told him that I was fleeing the governing regime. He asked me how long I had had problems with the regime. I told him that my problems had started when Juan Orlando Hernandez, the current president, came to power. The interviewer asked if I had been persecuted. I told him I had been gathering people to work in politics, that several of my friends involved in the same work had been disappeared, and that the military was following me.

23. The interviewing officer spent quite a bit of time asking questions about the caravan. He wanted to know the leader of the caravan was, where I learned about the caravan, why I joined the caravan, where the idea to have a caravan came from, and if there are plans to have more caravans. I responded that I had joined the caravan in an attempt to save my life.

24. When I explained that I was fleeing danger in Honduras, the officer asked me why I came here, since the same thing could happen to me in the United States. I said I was seeking asylum. The officer asked if I knew what asylum was, and I responded that it means protection.

25. The officer also asked about my fear of returning to Honduras. I said I was fleeing the current government, which is run by a dictator who has imposed his will on the entire country. I explained that members of the Honduran military were looking for me and wanted to kill me.

26. At one point, the officer repeatedly accused me of lying. I had told him that I hid at my cousin's house for about two months and that I found out about the caravan when it passed in front of his house. This is all true, but the officer did not believe me.

27. I am not sure what I said after that. I was very hungry, nervous, and tired. I think the interview lasted around 45 minutes.

28. The officer asked me if I had sought asylum in Mexico, and I told him that I had, but had not yet received a response. I had gone to a job fair in Tijuana where I was told that I would only be allowed to work if I applied for asylum in Mexico. I am afraid to be in Mexico, but I am even more afraid of being deported to Honduras.

29. The officer never asked me if I was afraid of being in Mexico or if

anything bad had happened to me here. He said that because I had been living in Tijuana while waiting to seek asylum, I would continue waiting in Tijuana for my court date.

30. After the interview, the officer told me I had to sign some paperwork. I could not read the papers because I did not have my reading glasses, and because most of them were in English. After I signed, the officer asked me if I knew that my asylum claim could be rejected. I told him yes.

31. Then I was taken back to the hielera. I stayed there for about thirty minutes until an officer came back for me. I was taken to a hallway where the officers made us line up against the wall, and handcuffed us behind our backs. They hung our backpacks on our fingers behind our backs and we had to carry our backpacks to a caged van, which took us back to El Chaparral.

32. At El Chaparral, the U.S. officers took off our handcuffs and turned us over to Mexican officials. I saw officers from Grupos Beta and a man who told us that he was the head of Mexican immigration.

33. The Mexican officials welcomed us and gave us instructions. They told us to behave ourselves while we were in Mexico. They asked if we had somewhere to stay or somewhere to go, and offered to give us rides.

34. The man who had said he was in charge of Mexican immigration directed us to turn in our humanitarian visas. Most of us did not have our visas

with us. He said that our humanitarian visas had been automatically invalidated when we crossed the U.S.-Mexico border. He gave us temporary permits that he said were valid until March 19, when we had our appointments with the judge in the United States. He told us not to lose the permits and to always keep them with us.

35. I feel unsafe in Mexico. Because of the experiences I had while waiting for my number to be called, I almost never go outside. I have moved back into the same church I was in before; the conditions are the same. I stay in the church almost all day in order to avoid problems and possible violence. I am most afraid of the Mexicans who don't want asylum seekers in their country—like those who threatened violence against us in the migrant shelters. For that reason, I do not tell anyone that I am Honduran.

36. I am also afraid that the Honduran government will find me in Mexico and harm me. Even outside the country, the Honduran government often works with gangs and criminal networks to punish those who oppose their policies. I am afraid that they might track me down.

37. I am afraid that the Mexican government will deport me to Honduras. My immigration status here is temporary, and I am not confident that it protects me from deportation.

38. I am very concerned about how I will fight my immigration case from

here. I do not know very much about the process, but I have a U.S. citizen friend in Miami, Florida who had offered to help me. My sister is also a U.S. citizen, and she was going to support me and help me find the resources that I need. But I do not know how they will help from the United States while I am in Tijuana. I also do not know how I will make arrangements to get evidence that I need to prove my case, like declarations from people who witnessed what I went through.

39. Given that I have been targeted 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 5, 2019 at Tijuana, Mexico.

Gregori D
GREGORY DOE

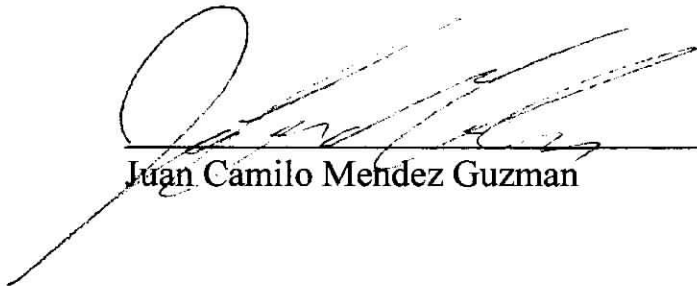
CERTIFICATION

I, Juan Camilo Mendez Guzman, declare that I am fluent in the English and Spanish languages.

On February 5, 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 5, 2019 at Tijuana, Mexico.



Juan Camilo Mendez Guzman

2/5/2019
Date