

## DECLARATION OF EVAN DOE

I, Evan 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 from San Salvador, El Salvador. I am thirty years old.

3. I went to the San Ysidro port of entry to seek asylum on January 29, 2019, after waiting in Tijuana for my number to be called since Christmas Eve of 2018.

4. I fled El Salvador after receiving threats from different groups of armed men for speaking out against the government. Since early 2018, I have spoken out against the corruption of both major political parties. In October 2018, I was threatened by armed men in military uniforms. Soon after, armed masked men wearing dark clothing put a gun to my head and threatened to kill me if I didn't stop speaking out against the government. I fled the country that week in fear for my life.

5. If I am sent back to El Salvador, I fear that the government will try to silence me by killing me and will threaten and hurt my family to intimidate me.

6. I do not believe the government would protect me if I were forced to return to my country because government officials were following and threatening

me before I left.

7. I have no criminal record.

8. I wanted to seek asylum immediately when I arrived at the U.S.-Mexico border, but I heard from other people in Mexico that I had to put my name on a list and wait for my number to be called. I put my name on the waiting list and waited about one month in Tijuana before my number was called.

9. I spent my first week in Tijuana in a small room near the Plaza Amariano. There, I tried to work with a man selling tacos, but each day I needed to come to El Chaparral to see what numbers were called. The Plaza Amariano was far from El Chaparral so I could not work and also keep track of the numbers. Later, I spent a few days in the shelter called Ejército Salvación. This place was very dirty and I would wake up with bites on my skin. I did not feel safe because of the disorder and lack of control and security.

10. In Tijuana, I have been stopped many times by the Mexican authorities and asked for my identification. It makes me feel like I am here illegally or doing something wrong just because I am from a different place. I think they stop me because my skin is darker, and because my accent makes it obvious that I am not from Mexico.

11. My number was finally called in January 2019. On the morning of January 29, 2019, I reported to El Chaparral, along with around 20 other migrants. The Mexican authorities with Grupos Beta asked us to give them our humanitarian

visas from Mexico. Then Grupos Beta took our group by van to the port of entry in San Ysidro, United States.

12. U.S. immigration officers at San Ysidro asked us to get into two lines, with men on one side and families and women on the other side. They asked if any of us traveled to the border with the caravan and separated those who had into a separate group. I myself had not traveled with the caravan, so I was in the non-caravan group. The officers ordered us to put our personal belongings in a bag, and also took our shoelaces, or belts, and any clothes apart from pants, a shirt, and a light sweatshirt. They asked us for our names, birthdates, nationalities, and where we were going. I believe that I was the only Salvadoran there. They brought us some food. Then they brought us to a white hall with a bright white light. They lined us up with our hands behind our backs and searched us.

13. After the search, they had us sit in metal chairs and they called us up for questioning one by one. A female officer first asked me basic questions like whether I had ever come to the U.S. and where I wanted to stay in the U.S. Then I was asked to wait again, until a male officer took my fingerprints and photo.

14. I waited more, and then was called back to speak with the female officer who initially questioned me. She asked if I understood English. I said I spoke a little bit, and he said something in English that I didn't understand. I didn't really understand what was happening in the moment because I was so nervous. They brought us hamburgers and let us use the bathroom. Then they

brought us to a cell with several other people in it. They gave us plastic blankets to sleep on. It was very difficult to sleep because the floor was so cold, the lights were on all night, and the floor was packed with people trying to sleep.

15. The next morning, officers took us out of the cell and gave us some food. Then they started calling people out to be interviewed one by one. When my name was called, I was brought to a room with cubicles where several officers were working. I was told to take a seat in one of the cubicles.

16. The officer in my cubicle was female. I don't remember her name but she appeared very serious. She asked me if I knew why I was there and that she was going to take my declaration. She told me to raise my right hand and swear to tell the truth. Then she asked me several questions like where I was from, if I had ever tried to enter the U.S., if I had come by myself or with children, and if I had ever used false documents. She asked me about my asylum claim and I told her about the death threats I had received in El Salvador. When I tried to provide detail in my answers, she would cut me off and move onto the next question. At certain points she would say things like "no, we are not going to talk about that right now" and move onto the next topic. This made me feel like I could not provide all of the relevant information or any information apart from what she asked me.

17. The officer did not ask me if I was afraid to return to Mexico. Had she asked me whether I was afraid to be in Mexico, I would have told her yes, I am afraid because I feel that I am in danger here. Mexico is a very dangerous place for

asylum seekers like myself. I have seen many posts on social media where Mexicans asked that we be deported. A friend of mine who is also from El Salvador was assaulted and robbed and left without his documents; now, whenever the police stop him, they threaten to deport him unless he agrees to pay a bribe. This makes me feel that I am in danger because I could be deported before my asylum hearing is completed.

18. There were many times that the officer had trouble communicating with me in Spanish. I believe because of all the errors she made, Spanish was not her first language. I did not understand many of her questions. When I later had a chance to review the transcript of the questions she asked me with someone who spoke English, I found several errors. She did not ask me any questions about my time in Mexico or whether I felt safe here.

19. Near the end of the interview, the officer asked me to sign some paperwork. She read a document written in Spanish regarding my rights as a Salvadoran citizen and she told me I had a right to return to my country.

20. The officer told me there was a new policy and that I had to sign a paper saying that I would wait for my asylum hearing in Mexico. She told me that I needed to go to the San Ysidro port of entry at 9:00 a.m. on March 19, 2019 for my court date and that they would bring me to court for my 12:30 p.m. appearance. She did not tell me what documents I would need to bring that day. She said that I could bring an attorney with me to court if I had one.

21. After the interview, I was brought back to the cell. About an hour and a half later, officers took me and several migrants out of the cell, returned our belongings, put us in handcuffs together, and brought us to a bus. There were maybe 13 of us total. We were told we had to present ourselves at a court on March 19, 2019. Then we were transported back to El Chaparral in Tijuana and taken to the office of Grupos Beta.

22. Grupos Beta officials told me that because I had left Mexico to ask for asylum in the United States, my humanitarian visa was no longer valid in Mexico. They gave me a paper that says I have permission to be in Mexico for 79 days.


23. I am scared to be in Tijuana because it is not a safe place. I saw someone get robbed in the center of town and have read in the news about the many homicides and kidnappings here. Because the Mexican authorities have stopped me many times for no reason, I am also afraid that I might be deported from Mexico to El Salvador while I am waiting for my court date. Because of my darker skin and accent, and because I spend time in spaces where there are other migrants, I feel very visible.

24. I have been looking on the internet for lawyers and have emailed several, but I have not gotten responses. Here, I have no family support or friends to help me gather evidence for my case. In the United States, I have a friend and an uncle who have offered to help, and I planned to look for an attorney in the United States.

25. Given that I have had problems 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 parents and siblings 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 4, 2019 at Tijuana, Mexico.

  
\_\_\_\_\_  
EVAN DOE

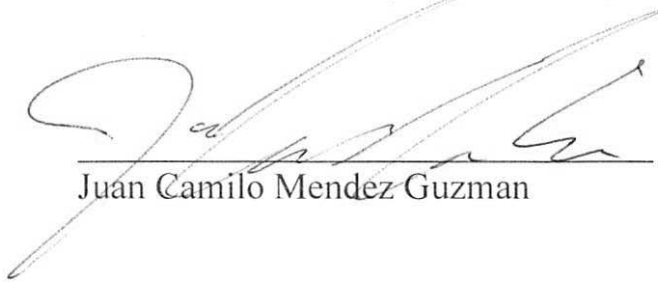
CERTIFICATION

I, Juan Camilo Mendez Guzman, declare that I am fluent 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 at Tijuana, Mexico.

  
\_\_\_\_\_  
Juan Camilo Mendez Guzman

2/4/2019  
\_\_\_\_\_  
Date