

| Question   | Expected Answer   | Actual Answer |
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| Full name?   | [RESP. NAME]  |               |
| Where were you born?<br>How old are you?   | _____, [XXX], El Sal<br>23 yo   |               |
| Who did you live with in El Salvador?  | I lived with my mother and siblings, then with my uncle, then again with my mother, and in the end I lived with a friend.           |               |
| What is your highest level of education?<br><br>Where did you study?<br>(Tab H)<br><br>What were you studying?<br><br>What did you hope to do professionally in El Salvador? | Through university.<br><br>I went to [XXX] El Salvador, [XXX].<br><br>Community development, mgmt & tourism, other topics<br><br>?? |               |
| Do you practice a religion?<br><br>Were you a part of a church in El Salvador?<br><br>What did you do as a member of the church? (Tab X)                                     | Catholic<br><br>Yes; local church in [XXX]<br><br>Went to church<br>Youth ministry  |               |
| Were you a part of any other groups while living in El Salvador?<br>(Tab V, W)<br><br>What are [XXX]?<br>(Tab U, explaining [XXX] in ES)                                     | [XXX]<br><br>Briefly worked on political campaigns<br><br>Community orgs that improve conditions                                    |               |

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| What did you do as a part of the [XXX] in [XXX]?<br><b>(Tab V, 182)</b>   | Potable water projects, community Housing, worked on schools and other projects  |  |
| Were you involved in electoral politics in El Salvador?   | Just a little bit of work during local elections in 2011, 2014 for money<br>My uncle [UNCLE'S NAME] is active in [XXX]   |  |
| Did you work while living in El Salvador?   | Worked as waiter to put myself through college   |  |
| Were your family members involved in these activities—going to University, church, community activism, work?  | Not really<br>I'm first in family to go to college<br>My uncle is a good guy, religious<br>Mom is fine<br>Rest of my maternal family is involved in MS   |  |
| When you say that your maternal family belongs or belonged to MS, who are you referring to?<br><br>What is a "palabrero"?<br><i>(will see how they translate that. Should be "shot-caller"—want to convey that [NAME] and now [NAME] are not merely members but higher-ups authorized to green-light people, as they did with [RESP. NAME])</i> | Cousins in Familia [NAME], and a couple uncles.<br>Main members in record:<br>1. _____(palabrero; cousin; murdered in 2015 while [NAME] in hiding) <b>(Tab D—death cert; Tab I—news article about death)</b><br>2. [COUSIN'S NAME] (younger cousin who is new palabrero after [NAME]'s death) <b>(Tab D—claimed [NAME]'s body)</b><br>3. [NAME] <b>(murdered in 2016) (Tab CC)</b> |  |

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| What role did your maternal family, Las [NAME] [or however he refers to them] have within the Mara Salvatrucha in your neighborhood?  | More than just members; they were and are in charge   |  |
| What was your relationship like with your cousin, [NAME]?<br><br>( <b>Tab A</b> -statement, <b>Tab B</b> -mom's letter, <b>Tab C</b> -aunt's letter [mom of [____]], <b>Tabs Y &amp; Z</b> -brother and cousin letters) | In 2014 began trying to recruit me<br>Told me I was obligated because of family ties<br>Threatened to kill me<br>Tried to kill me ( <b>Tab F</b> , [NAME]'s letter about MS shooting) |  |
| When [NAME] told you that you had to join the Mara Salvatrucha, how did you respond?  | Tried not to answer<br>Said no<br>Avoided him   |  |
| Why didn't you want to join the Mara Salvatrucha?   | They do bad things—kill people, renta, etc<br>I wanted to study and have a good job and life<br>I wanted to contribute to better community  |  |
| If you know, why did [NAME] think you, specifically, were obligated to join MS?   | Because I was a member of the family [NAME]<br>Because I knew a lot of information about the family   |  |

[RESPONDENT'S NAME]—Direct & Potential Cross Questions

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|   | Because he'd recruited all of my other cousins and family, except my brother who fled   |  |
| Do you know if [NAME] tried to recruit of your other family members to become part of MS?   | I don't know if he recruited them, but many of my cousins in [XXX] are MS. And I recently found out that [NAME] also tried to recruit my cousin [NAME]. |  |
| About how many members of your family are members of the Mara Salvatrucha?  | About 20 (?)  |  |
| Are they on your maternal side of the family, paternal side of the family, or both?   | Just maternal side—La Familia _____   |  |
| If you know, as [NAME] or your other family members aware that you were in University, that you were involved in your church and local [XXX]? | Yes, I think so   |  |
| What did [NAME] or other MS members think of your participation in the [XXX], church and school?  | They didn't like it<br>They wanted me to be MS<br>These groups help the community and hurt MS' power  |  |
| Were you able to convince [NAME] to let you continue with your life and activities and not join MS?   | No; he wouldn't let it go<br>He kept pursuing me  |  |
| So what did you do?   | I left my mother's house and went to live with my paternal uncle [NAME]   |  |

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|   | _____ [XXX] to avoid [NAME] and MS  |  |
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| Were you able to avoid problems when you relocated to live with your uncle?   | For some time it was okay<br>Then had a confrontation with M18 who knew I wasn't from there   |  |
| If necessary: What happened during this confrontation with M18?<br><br><br><br><br>When did this happen?  | They roughed me up (a couple punches, not too serious)<br>They interrogated me about where I was from<br>They put a gun to my head<br>They said they'd kill me if they ever saw me again ( <b>Tab A and CFI</b> )<br><br>[DATE] 2015 ( <b>CFI</b> ) |  |
| During this incident, did members of the 18 gang ask you your name or who you were?<br><br>If you know, during this incident, did M-18 discover that your true identity—that you were from [XXX], or that you were from the [NAME] family?<br><br>What do you think would have happened if they had known those things? | Yes; I didn't tell them<br><br>No<br><br>They would have shot me dead. They had a gun. The MS and my family are their enemies.  |  |

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| And what happened next?  | They let me go, but followed me<br>Said I would die, they were going to kill me, that I'd be hiding my whole life<br>I hid for a minute in a business<br>I called uncle, went to make police report   |  |
| Where did you go to make the police report?<br><br>What happened when you tried to make the police report?   | [XXX] police, rural branch<br><br>They asked for names and addresses of the people who had beaten me and threatened my life. I didn't know their names.<br><br>Police said if I didn't know the names and addresses I couldn't make a police report.<br><br>This is crazy, that they ask for information of someone who is harming you. |  |
| So were you able to make a police report against 18 for death threats?<br><b>(Tab E—uncle's letter)</b><br><br>The police said they would not make a complaint against the people who tried to kill you because you didn't have their full names and addresses. In your opinion, why didn't the police take down your complaint? | No; they wouldn't take down my information<br><br>Corruption<br>They're scared of the gangs<br>Police can't protect you   |  |

[RESPONDENT'S NAME]—Direct & Potential Cross Questions

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| If you know, was that the end of your problems with the Mara 18?                                | According to my uncle, they still come by to look for me<br><br>My uncle fled his house because he was scared he would be harmed because of me.   |  |
| What do you think would happen to you if you went back to an area that M18 was active in [XXX]? | They would kill me<br>They wanted to kill me before<br>If they discover I am a [NAME], they'd definitely kill me—they have been in a war with my cousins and they would kill me just for being a family member of theirs                                    |  |
| So after the attack you described on [DATE] what did you do?                                    | Returned to mom's house<br>Scared that 18 was going to kill me  |  |
| What happened when you returned to your mother's house?   | For a few days okay; did not leave house much<br>Went to church sometimes<br>Would always go home if saw any MS members<br>Sometimes went to play soccer with my friend [NAME], who is a community activist too, and some guys came up and started shooting |  |
| When did this happen?   | [DATE]2015  |  |
| Who were the people who approached you and [NAME] that day [and started shooting]?              | They were from local MS   |  |

[RESPONDENT'S NAME]—Direct & Potential Cross Questions

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| How do you know they were from the MS?  | I've seen them before; they go around with [NAME] and MS; I don't know their names. And my friend [NAME] has told me that they continue looking for me.  |  |
| What did you do?  | [NAME] yelled "run"<br>I ran; hid in the forest<br>Called mother, told her he was fleeing<br>Never returned home<br>Went to motel<br>Went to stay with school friend,<br>_____, in [XXX]<br>Scared I would be killed by MS if I went home to mom's house |  |
| If you know, why did [NAME] or MS members come after you that day?  | I'd just come back from another zone; I think they thought I had gotten involved in 18 or had spoken with police<br><br>I believe [NAME] told them to kill me  |  |
| You testified that [NAME] had been trying to recruit you to become a member of MS for several years, and believed you were obligated to do so because of your family.<br><br>So why do you think that now, he was trying to kill you? | At first, he wanted to recruit me. But now, it was to punish me.<br><br>[NAME] and MS didn't like that I wasn't a part of them, that I lived my life a different way. They saw me as an enemy and a threat. So they were going to kill me as punishment. |  |
| Do you know when [NAME] was murdered?<br><b>(Tab D-[NAME] death cert)</b>   | [DATE] 2015—shortly after I fled [XXX] They said it was by a rival gang  |  |
| If you know, who is MS's rival in [XXX]?  | M-18   |  |



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| <p><i>[If this is “leading”—I can show him El Diario article at <b>Tab I</b>, noting that [XXX] was killed by ‘rival gang members with firearm’, and ask him if he has an opinion as to who the rival gang is that the article refers to]</i></p> | <p><b>(Tab I- “killed by rival gang with firearm”)</b></p>  |  |
| <p>How did you first find out about [XXX]’s death?</p> <p>How did you feel when you found out that [XXX] had been murdered?</p>   | <p>Mom told me over phone</p> <p>Scared<br/>I was worried they thought that I’d had something to do with it, because it was so soon after I fled</p>  |  |
| <p>Was [XXX] the only person who you had problems with in your family?<br/><b>(Tab D- _____s body)</b></p>  | <p>He was the most powerful at the time, so he was the one recruiting me<br/>I believe he was the one who green-lighted me in [DATE]<br/>But now, his younger brother, _____, is the <i>palabrero</i></p>   |  |
| <p>Now that [NAME] is dead, do you think your trouble with MS has ended?</p>  | <p>No. If anything it’s worse. [NAME] thinks I had something to do with [NAME]’s death, he’ll kill me. I think I’m green-lighted.</p> <p>My friend [NAME], who was with me the day that MS ran at me and started shooting, says that they have interrogated and beaten him up to ask where I am and</p> |  |

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|   | <p>warned him not to be seen with me. This happened after [NAME]’s death (<b>Tab F at 18</b>) (<i>OJO: [NAME] says he was ‘in his house’ for three weeks—that would make it after [NAME]’s murder—and was later threatened by MS post-murder. This means that it wasn’t [NAME]’s doing!</i>)</p> <p>I think this is proof that MS continues to look for me and wants to kill me.</p> |  |
| In your opinion, why do you think that [NAME] or other members of MS want to harm you?    | <p>Because they think I am an enemy</p> <p>Because I was obligated to join because I am a [NAME] and I refused</p> <p>Because I have special knowledge of my family, who is almost all MS</p> <p>Because I fled</p> <p>Because they think I am 18 or had something to do with [NAME]’s murder</p>  |  |
| Okay. So once you got to your University friend [NAME]’S house in [XXX], what did you do? | <p>Hid</p> <p>Traumatized</p> <p>Didn’t go out</p> <p>Was scared of both MS and M-18—thought that a palabrero from either mara could figure out who he was and that he was green-lighted</p>   |  |
| If you were that scared, why didn’t you leave El Salvador right away? Why go to [XXX]?    | <p>I didn’t have the money to leave right away.</p> <p>My mom had to sell land.</p> <p>My brother helped.</p>  |  |

[RESPONDENT'S NAME]—Direct & Potential Cross Questions

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| After you left [XXX] that day of the shooting in [DATE], did you ever return home to your neighborhood, [XXX], or city, [XXX]? | No  |  |
| When did you leave El Salvador?  | [DATE] 2015   |  |
| Have you ever had contact with the police in El Salvador?  | I went once to make the police report against M18 and they sent me away<br><br>One time, around 2011, a police officer approached me when I was returning home late one night. He hit me. |  |
| If you know, why did this police officer hit you?  | I don't know. Maybe he thought I was doing something wrong or was a gang member.  |  |
| What do you think would happen if you are returned to El Salvador?   | They will kill me   |  |
| Who will?  | MS/my family<br>M18<br>Police<br>Sombra Negra/other people who think I'm a gang member  |  |
| Why do you think the MS would harm you?  | To punish because I refused to join, because I wanted to live my life another way<br><br>Because they think I'm obligated because I'm part of the family [NAME]                           |  |

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|  | <p>Because they think I might have something to do with [XXX]'s death or might have gotten involved in 18</p> <p>Because they've already tried to kill me and I know they're capable</p>  |  |
| Why do you think the Mara 18 would harm you?                                       | <p>They threatened to kill me before</p> <p>If they find out that I'm part of the [NAME] family, they'll know I'm an enemy</p> <p>They've killed other members of my family</p>   |  |
| How would the Mara 18 find out that you are part of the [NAME] family?             | <p>They have networks and share information</p> <p>They check DUIs/identification, and my last name is [NAME]</p>   |  |
| Do you think the police could protect me from the Mara Salvatrucha or the Mara 18? | <p>No</p> <p>Police are corrupt, they're involved with the Maras</p> <p>They refused to take my statement before, why would they protect me now?</p> <p>Also, they kill suspected gang members</p> <p>I'm at risk because of my family—I'm scared of the police as well</p> |  |

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| You mentioned the Sombra Negra. Who are they and why are you scared they would harm you?  | Military/police or ex-members who are armed paramilitary death squad<br>They kill gang members, suspected gang members, and family members<br>I think they would kill me because of my family or my age, because they think I'm a gang member |  |
| Is there anywhere in El Salvador that is safe for you?  | No.<br><br>I tried to move twice—to my uncle's and to my friend's. But there's no place that isn't either MS or 18 territory.<br><br>And both MS and 18 are trying to kill me, so no place is safe.   |  |
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| <b>Cross</b>  |   |  |
| In our CFI, the officer asks you "which gangs are you having problems with" and you said "18". You didn't mention the MS. But in your statement and testimony, you said the MS tried to kill you. | When I answered that question I was thinking of the time that members of the 18 attacked me and threatened to kill me. But I also had problems with MS, and I know I talked about those with the officer later.                               |  |
| Why didn't you mention other cousins supposedly in the MS, like [NAME], in your CFI? You said you only had problems with [NAME]   | My problems were worst with [NAME]. [NAME] was the only person who has ever approached me in person, directly, to threaten me. So in my mind, at least at the time, he was my worst problem.  |  |
| Why did you say in your CFI that you didn't know if [NAME] tried to recruit   | I didn't know who recruited them; I just know who tried to recruit me. I found out  |  |

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| anyone else in your family to be MS?<br>Didn't you say that your whole family was MS?  | recently that [NAME] tried to get my older brother [NAME] to join, but I didn't know that at the time.   |  |
| You said in your credible fear interview that you "didn't know" why your cousin targeted you for recruitment. Now you're saying it was on account of your family, or because of your political opinion. How can that be?             | I know that my cousin [NAME] said I had to join because I belonged to the same family, I had to belong to the same gang. But in the end, I can't know for sure why he targeted me. I am just saying what I believe to be true.   |  |
| In your CFI, you said you had bruises on your face when you went to the police. Is that true? Did you ever get medical attention? You didn't mention that they hit you in the face? What did they hit you with?                      | They punched me a few times. I didn't get medical attention. They were small bruises. They hit me with their fists.  |  |
| Why don't you mention your participation in youth ministries, or community organizations in your I-589 where it says to list all your membership in organizations?   | Maybe I misunderstood. My attorney asked me if I was a part of any political parties and I told her I'd worked on a couple of local campaigns.   |  |
| In the death certificate for your supposed cousin, it says his name is "[NAME]". Your whole case seems to be about the "[NAME]" family. Is this a totally different cousin? His name isn't even [NAME].<br><b>(Tab D-Death Cert)</b> | I'm not sure why they called him that. The person who gave that information was my cousin, [NAME] [NAME] his brother. They have the same parents. [NAME]'s mother is named [NAME]; she's my mother's sister. [NAME] has always been known as [NAME], like his brother [NAME]. When my cousin gave the names, he used |  |

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|  | my aunt's first surname, [NAME], instead of [NAME]. I can't say why. ( <b>See Tab C, "[NAME]"</b> )   |  |
| And his mom's letter says the same "[NAME]". This time, even the spelling of his first name is different.<br><br>Is this a different person? Is this even a real person?   | I don't know why my aunt spelled his name that way. She does not have much education, so it's hard for her to write.<br><br>He was always known in the community as [NAME]. For example, in the newspaper they call him "[NAME]." He was known as part of my maternal family, the [NAME]. |  |
| Why isn't your father here to testify? He lives in [CITY/STATE], right?  | I don't have much of a relationship with my father. We don't talk. He didn't know anything about the problems I was having with [NAME].<br>He came to the U.S. many years ago. We have been estranged.  |  |
| Why isn't your brother here to testify? He submitted a letter. Why isn't he here to be cross-examined?   | He is here without papers and has two little children. He was too scared. His wife said she wouldn't let him come to immigration court. She is afraid he would be deported to El Salvador.  |  |
| In your testimony, you said that when MS attacked you, you went to hide in the forest, and then took a bus to a motel. But in your credible fear interview, you said that you were "hiding all day and night until you called someone for my | I think that the interviewer might have misunderstood me or I might have misspoken in my interview. When MS started shooting, I ran as far as I could, and ran into a forest area. I stayed there for a long time, until I was sure that they   |  |

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| family to pick me up.” Who did you call?<br>How long were you waiting?   | were gone, and then I [ <b><u>OJO—what’s the real story? did someone take him to the motel? he said he took the bus!</u></b> ]   |  |
| In your credible fear interview you said that only the “gang members who beat me when I was at my uncle’s” mistreated you. But you described today in great detail how you were threatened and even in your CFI about how the police hit you. Were those lies? Did no one else mistreat you? | I think I interpreted the question to mean “has anyone ever hit you” when they said “harm you.” As I’ve spoken about, MS members shot their guns at or near me, and I’ve been threatened by both MS and 18. And yes, I was hit by a police officer once, years ago. But I was thinking about recently, when members of the 18 hit me. That’s how I was defining harm in my head.   |  |
| You lived in [XXX] with your friend for almost three months without having any problems with gangs. Why can’t you go back and live there? Or go live somewhere else?   | While I lived in [XXX], I didn’t go out<br>Gangs are everywhere. They are like the government. They own all territory in ES. They communicate and if I’m seen somewhere they will ask for my DUI and figure out who I am. And kill me.   |  |
| You say that people who are in the “familia [NAME]” are all at risk. But you lived with your mom, and our sister and your brother in El Salvador, right? But they don’t seem like they’re in danger.   | Yes. I think they are in danger. I’m afraid that one of the [NAME]’s might hurt my mother, sister, or brother because they are angry at me for being “disloyal.” I’m also scared that the M-18 might hurt them because they know they are [NAME]. My older brother had the same problems as me, and he fled. So I think that we are all in danger, but I am in the greatest danger right now. We could not all afford to flee. |  |



[RESPONDENT'S NAME]—Direct & Potential Cross Questions

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