

Pro-Bono Counsel for Respondent

NON-Detained

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE OF IMMIGRATION REVIEW  
CHARLOTTE IMMIGRATION COURT**

\_\_\_\_\_  
In the Matter of: )  
 ) )  
 ) )  
Respondent, )  
 ) )  
In Removal Proceedings\_\_\_\_\_ )

File No.: A

**Immigration Judge : Individual Hearing: November 1<sup>st</sup>, 2021 at 8:30a.m.**

**RESPONDENT’S PROPOSED EXHIBIT LIST WITH TABLE OF CONTENTS**

## TABLE OF CONTENTS

| Tab | <b>Section I<br/>Respondent's Biographic Documents</b>   | Pages  |
|-----|--|--------|
| A   | Copy of Birth Certificate of RESPONDENT, with certified English Translations   | 2-4    |
| B   | Copy of Honduran Identification Card and Honduran Passport of Respondent, with certified English translations  | 5-10   |
|     | <b>Section II<br/>Respondent's Sworn Declaration, Amended I-589 Application, Copy of Biometrics Stamped</b>  |        |
| C   | Amended I-589 Application for Asylum/Withholding   | 11-25  |
| D   | Copy of Stamped Biometrics dated January 14, 2021  | 26-27  |
| E   | Notarized and Sworn Declaration of Respondent  | 28-42  |
|     | <b>Section III<br/>Affidavits and Photographs in Support of Asylum Claim and Respondent's Credibility and Corroboration</b>  |        |
| F   | Notarized and Signed Employment Certificate from the Banco Azteca confirming Respondent's employment in the position of Universal Cashier from April 14, 2016 until August 14, 2018, with certificated English translation | 43-50  |
| G   | Copy of the Banco Azteca Employment Identification Card of Respondent with her photograph  | 51-52  |
| H   | Print-out of Photographs of Respondent in her Banco Azteca uniform while at work and with her co-workers   | 53-56  |
| I   | Notarized and Signed Employment Certificate from Respondent's former employer when she worked as an assistant performing accounting from July 2010 to July 2013, with certified English translation                        | 57-59  |
| J   | Notarized and Sworn Affidavit of Respondent's Father, with photo identification card and certified English translation   | 60-68  |
| K   | Notarized and Sworn Affidavit of Respondent's Mother, with photo identification card and certified English translation   | 69-77  |
| L   | Notarized and Sworn Affidavit of Respondent's former co-worker and immediate boss at the Banco Azteca with photo identification card and certified English translation   | 78-86  |
| M   | Notarized and Sworn Affidavit of Respondent's former co-worker with photo identification card and certified English translation  | 87-95  |
| N   | Notarized and Sworn Affidavit of Respondent's former neighbor and friend of her mother with photo identification card and certified English translation  | 96-105 |
|     | <b>Section IV<br/>Respondent's Medical Diagnosis from Attack in Honduras</b>   |        |

|   |   |         |
|---|---|---------|
| O | Notarized and Signed Medical Diagnostic Report from Dr. ___ of the “Clinica Murillo,” the doctor who treated the Respondent after she was brutally attacked and knocked unconscious in the street at the direction of PERSECUTOR NAME on 01/25/2019, with certified English Translation   | 106-114 |
|   | <b>Section V<br/>Affidavits of Expert Witnesses</b>   |         |
| P | Expert Affidavit and Curriculum Vitae of Dr. ___, Professor of Political Science and International Studies of Washington College, addressing the recent country conditions in Honduras, with specific attention to violence perpetrated by organized crime (including narco-traffickers), violence against women, and the nature of corruption in the country   | 115-155 |
| Q | Expert Affidavit a forensic clinical psychologist of the Medical University of South Carolina and Associate Professor of Psychiatry recognized as an expert in clinical forensic psychology by the courts in both Georgia and South Carolina during numerous hearings and trials, <i>finding that the Respondent appeared to be “an accurate historian” and that she meets the diagnostic criteria for PTSD as a result of the threats and attacks she experienced while living in Honduras</i> , with Curriculum Vitae | 156-181 |
|   | <b>Section VI<br/>Reports on Country Conditions and Laws in Honduras</b>  |         |
| R | U.S. Department of State, <i>Country Report on Human Rights Practices in Honduras for 2020</i> , available at <a href="https://www.state.gov/reports/2020-country-reports-on-human-rights-practices/honduras/">https://www.state.gov/reports/2020-country-reports-on-human-rights-practices/honduras/</a> .   | 182-208 |
| S | Report on Honduras, Anti-Money Laundering, Know Your Country, available at <a href="https://www.knowyourcountry.com/honduras1111">https://www.knowyourcountry.com/honduras1111</a> .  | 209-214 |
| T | Republic of Honduras, Seventh Enhanced Follow-up Report and Technical Compliance Re-rating, GAFILAT, January 2020, available at <a href="https://www.gafilat.org/index.php/en/biblioteca-virtual/miembros/honduras/informes-de-seguimiento-9/3744-seventh-enhanced-follow-up-report-of-honduras/file">https://www.gafilat.org/index.php/en/biblioteca-virtual/miembros/honduras/informes-de-seguimiento-9/3744-seventh-enhanced-follow-up-report-of-honduras/file</a>   | 215-233 |
|   | <b>Section VII<br/>Supporting Documents Relating to the Honduran<br/>Narcotrafficker PERSECUTOR NAME and his<br/>Criminal Enterprise and he and his family’s Involvement<br/>in Politics</b>  |         |
| U | Indictment issued by the United States District Court of the Southern District of New York charging PERSECUTOR on the following counts: 1) Cocaine Importation Conspiracy; 2)   | 234-244 |

|   |  |         |
|---|--|---------|
|   | <p>Possession of Machineguns and Destructive Devices; 3) Conspiracy to Possess Machineguns and Destructive Devices, issued on July 17<sup>th</sup>, 2018, available at <a href="https://www.justice.gov/usao-sdny/press-release/file/1081346/download">https://www.justice.gov/usao-sdny/press-release/file/1081346/download</a>.</p>  |         |
| V | <p>U.S. Department of Justice, United States Attorney Southern District of New York, Memo Endorsed from U.S. Attorney Geoffrey S. Berman to Honorable Judge Denise L. Cote in the case of United States v. PERSECUTOR, stating that “On January 7<sup>th</sup>, 2019, the Government transmitted a letter to Honduras requesting that the defendants be provisionally arrested in aid of anticipated extradition requests by the United States. On April 4, 2019, the Government learned that based on its provisional arrest request, Honduras authorities had arrested defendant .... On June 14, 2019, the Government learned that Honduras had granted the Government’s request to extradite defendant, but that Honduras is deferring his extradition until local criminal charges are resolved... The remaining two defendants in this case have not been arrested.”</p>                           | 245-246 |
| W | <p>United States Department of Justice from the Southern District of New York, For Immediate Release, “Second Honduran Congressman Charged with Conspiring to Import Cocaine Into the United States And Related Firearms Offenses,” Dated Tuesday July 17<sup>th</sup>, 2018, stating that “ The United States is seeking the defendants’ extraditions from Honduras and Guatemala... Special Agent in Charge Raymond P. Donovan said: “DEA and our partners continue to expose drug-related corruption across the world, which fuels violence and insurgency while upending the rule of law. These Honduran elected officials and their associates allegedly conspired with the Sinaloa Cartel and flooded American communities with huge amounts of deadly poison. DEA looks forward to their extradition to the United States to face American justice and answer for their many alleged crimes.”</p> | 247-250 |
| X | <p>United States Department of Justice from the Southern District of New York, For Immediate Release, Tuesday, March 30, 2021, announcing the conviction and sentencing of the Former Honduran Congressman Tony Hernandez and the brother of President Juan Orlando Hernandez to Life in Prison and listing his co-conspirators “Special Agent in Charge Wendy C. Woolcock said: “Exploiting a high-ranking position in government to wield the power of the state to support drug trafficking is as nefarious as it comes.</p>  | 251-256 |

|    |   |         |
|----|---|---------|
| Y  | United States Department of Justice from the Southern District of New York, For Immediate Release, Monday, March 22, 2021   | 257-259 |
| Z  | Article Entitled, “A Honduras Political Clan and Its Criminal Fiefdom,” by Steven Dudley and Felipe Puerta of InSight Crime, detailing the criminal enterprise of the Urbina Soto family, available at <a href="https://insightcrime.org/investigations/honduras-political-clan-criminal-fiefdom/">https://insightcrime.org/investigations/honduras-political-clan-criminal-fiefdom/</a> .  | 260-274 |
| AA | Article Entitled, “Honduras Mayor Accused of Leading Murderous Drug Running Gang,” by Marguerite Cawley of InSight Crime, reporting, “On July 27, police arrested Arnaldo Urbina Soto, the Mayor of the northern municipality of Yoro, on charges of storing illegal weapons and money laundering... The authorities have accused the Urbina Soto criminal organization of drug trafficking, hired assassinations, providing security to narco-planes and land theft. They believe it consists of some 37 members responsible for 137 deaths and 45 disappearances, according to El Herald,” available at <a href="https://insightcrime.org/news/brief/honduras-mayor-accused-of-leading-murderous-drug-running-gang/">https://insightcrime.org/news/brief/honduras-mayor-accused-of-leading-murderous-drug-running-gang/</a> . | 275-279 |
| BB | Print out from the Municipality of Yoro Webpage ( <a href="https://portalunico.iaip.gob.hn/portal/index.php?portal=317">https://portalunico.iaip.gob.hn/portal/index.php?portal=317</a> ) confirming that Carlos Fernando Urbina Soto’s sister Diana Urbina Soto is the current mayor of Yoro, with English translations  | 280-288 |
| CC | Print-out from online of photos of Buses from the Bus Transportation Business owned by the Urbina Soto family called “Cotasy!””, with certified English translation.  | 289-293 |
| DD | Article entitled “Guatemala: Two Arrested for Drug Trafficking May Face Extradition,” confirming that Honduran national Francisco Inestroza, 30, was arrested and wanted by the U.S. government in connection with conspiracy to manufacture and distribute cocaine, available at <a href="https://www.occrp.org/ru/daily/2385-guatemala-two-arrested-for-drug-trafficking-may-face-extradition">https://www.occrp.org/ru/daily/2385-guatemala-two-arrested-for-drug-trafficking-may-face-extradition</a>   | 294-295 |
|    | <b>Section VIII<br/>Legal Sources</b>   |         |
| EE | UNHCR, Guidelines on International Protection No. 1: Gender-Related Persecution Within the Context of Article 1A2 of the 1951 Convention and/or its 1967 Protocol Relating to the Status of Refugees, 7 May 2002, available at <a href="https://www.unhcr.org/en-us/publications/legal/3d58ddef4/guidelines-international-protection-1-gender-related-persecution-context.html">https://www.unhcr.org/en-us/publications/legal/3d58ddef4/guidelines-international-protection-1-gender-related-persecution-context.html</a> .  | 296-306 |

|    |   |         |
|----|---|---------|
| FF | UNHCR's Eligibility Guidelines for Assessing the International Protection Needs of Asylum-Seekers from Honduras (July 27, 2016), available at <a href="https://www.refworld.org/docid/579767434.html">https://www.refworld.org/docid/579767434.html</a> . | 307-332 |
|    | <b>Section IX<br/>Other Documentation in Support of a Favorable<br/>Exercise of Discretion</b>  |         |
| GG | Copy of Birth Certificate of Respondent's daughter, with certified English Translation and Proof of School Enrollment   | 333-337 |
| HH | Copy of Hospital Verification of Facts for the birth of Respondent's U.S. citizen son and copy of his social security card  | 338-340 |
| II | Copy of Domestic Violence Order of Protection Granted by the Mecklenburg County Judge to Respondent against her former partner and father of her children   | 341-357 |
|    | <b>Proof of Service</b>   |         |

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE OF IMMIGRATION REVIEW  
CHARLOTTE IMMIGRATION COURT**

In the Matter of:

Respondent  
File No.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_ day of \_\_\_\_, I, , served a true copy of Respondent's Proposed Exhibits and Table of Contents, and Respondent's Pre-Hearing Brief and its supplemental materials to the Office of Principal Legal Advisor, Charlotte, NC by ICE e-service filing online and the Charlotte Immigration Court, 5701 Executive Center Dr, Charlotte, NC 28212, in person at the court-window.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: \_\_\_\_\_

Signature: \_\_\_\_\_