### SWORN STATEMENT OF MERA

I swear under penalty of perjury that the following is true and correct to the best of my knowledge and belief.

 My name is MERA. I was born on February 2, 1991 in San Alejo, La Union, El Salvador. I am a citizen of El Salvador. I suffered terrible harm in my country after I met a man named H E P O, who is the father of my daughter K N RA. H was affiliated with a gang and he subjected me to terrible domestic violence over the course of our relationship. He beat me, raped me, and constantly threatened my life and the lives of my children. I know that if I have to return to El Salvador, I will be harmed again.

## Growing up in El Salvador

- 2. When I was growing up in El Salvador, I lived with both of my parents in San Alejo. El Salvador. I have four siblings, three brothers and one sister. I am the oldest of five children. My father worked in the fields and my mother was a housewife. We came from a poor family, but my father always worked hard to support us. He was able to provide for the family with his hard work. We lived close to extended family like my grandfather and two uncles. I got along well with many of my family members.
- 3. Unfortunately, I also suffered great harm during my childhood. There was an uncle, Rudy, who abused me sexually when I was about five years old. He would come by our house and my mother would make food for him. He lived close by, about 10 minutes away. He would always do it when my mother wasn't there. This happened on many separate occasions. He took advantage of the fact that he thought he could get away with it. I was a young girl and never told my mother about what had happened. There was another incident that happened when I was sexually assaulted by a man at my fifteenth birthday party.

4. I met my son's father, OM, in 2008 when I was seventeen years old and still in school. We started a relationship, but he was a violent person. He mistreated me and would beat me frequently. My son Oscar was born on June 15, 2010. His father currently lives in Atlanta, Georgia. He does not have any contact with his son.

## *Meeting my abuser H*

- 5. In April 2013, I started working as a cashier at a store called Supertienda Jose. I had been looking for work in town. Supertienda Jose was a chain of stores in El Salvador. I went and inquired in person and one of the girls told me that there was indeed a spot available. I spoke with the owner Jose who happened to be there that day. He told me I could start the following day at the location in San Alejo.
- 6. One day around June 2013 a man named H E P O came into the store. He began to pursue me and started hanging around every time I left work. He would wait for me outside. I thought at first he was a calm and nice person. He told me he was Christian and came from a Christian family. He was wearing long sleeves and I did not notice any tattoos due to his clothing. He spoke respectfully to me and was kind. I knew nothing then about this propensity for violence.
- 7. Around the end of July of that year, we started a romantic relationship. I ended up getting pregnant with my daughter. She was born on April 10, 2014 and is currently eight years old.
- 8. H was very upset when he found out that I was pregnant. He beat me and told me that he wanted me to get an abortion. I refused to do so. He would come to my work and tell me I had to get an abortion. He would throw me against the wall, hoping to provoke a miscarriage. I suffered several more months of physical abuse by H because he was

so angry that I wouldn't get an abortion. He never wanted to get to know his daughter. I had to rely on my parents for help and support after my daughter was born.

## H travels to the United States

- 9. H went to the United States in 2014 right around the time that my daughter was born. He started to look for me again and started calling me frequently. I didn't want anything to do with him and I would always hang up the phone.
- 10. I later found out that he had started a relationship with another woman in El Salvador after we broke up. That woman had a twelve-year-old daughter. He started a sexual relationship with that woman's daughter and she became pregnant. He fled El Salvador because the authorities there were trying to find him.

### *H's deportation from the U.S.*

- 11. H was eventually located in 2015 and was detained for more than a year with ICE before finally being deported to El Salvador around March 2017.
- 12. Even when H was here in the US, I did not have any peace. Gang members would follow me down the street and harass me on my way to work. There were often as many as five different gang members who I would see during this brief walk. It would sometimes take me two hours to walk to work as I was trying to get through this group who were threatening me on H's behalf. They would attack me physically and beat me. They would also extort me for money. One day, a gang member threatened my life and told me that H kills for a living, and therefore he would have no problem killing me

- 13. H was detained when he returned to El Salvador. I believe he was imprisoned for the charges relating to the child rape as well as other charges relating to his association with the MS 13 gang. First H was put in a jail called Bartolinas La Union. In this jail there was a lot more security. It was more difficult for him to make phone calls.
- 14. Around April 2017, H was moved to a different jail, called Centro Penal La Union. He was later moved again to a jail in San Miguel. H started to call me from where he was being held as a prisoner. He would threaten to kill me and my family if I ever said anything. Later he threatened to extort me and started asking me for money and other things that he wanted, like clothing, shoes, and other things for his personal use. Later he forced me to go into the center where he was being held to have sex with him. These types of conjugal visits were permitted by the jail ,but I had to have an official letter saying that I was his partner in order to enter.
- 15. One time he forced me to bring our daughter K with me. This was when she was about three years old. She was very frightened to see him and would say that he was not her father. She considered my father, her grandfather, to be her father. He would beat me and out of fear for my life I never said anything about it. I know that the authorities would not do anything to defend me. He constantly threatened that he would kill my two kids and me if I did not do what he wanted. I believe he was a psychopath, not capable of love for anyone else. I never heard him express love for anyone else.
- 16. Several months passed like this. In October 2017 he began forcing me to go into the jail twice a month, on the 5<sup>th</sup> and the 20<sup>th</sup> of the month, to have sex with him. He always mistreated me and threatened to harm me. The guards would watch and not do anything to help me as he dragged me into the room and forced me to have sex with him. The

room was dirty and disgusting and I did not want to be there with him. On one occasion, a guard simply watched as he grabbed me by the neck and face and forced me into the room to have sex with him. On other occasions, guards watched him hit me and did nothing.

- 17. It was like torture for me to be forced to go to see him. He gave me several STDs and I had to have a painful cervical procedure in El Salvador to address the damage done to my body. I was always very afraid of him because I know what he is capable of doing. He belongs to a gang. I am very afraid of what could happen to me if I go back and I am killed. My kids rely on me and without me they will be alone.
- 18. I felt like I could not say no to H because he would threaten me all the time from jail. He would call me and say that they would be sending me home to my family in San Alejo in a box if I didn't go see him. I was also robbed on at least two occasions at the store I was working at in 2018 and had a gun put to my head. I felt like I was being specifically targeted, since this happened only to me and not to other employees.
- 19. I could no longer stand the abuse that he was subjecting me to but felt obligated to do what he was telling me as long as I was living in El Salvador. That is why I had to immigrate to the United States. I know if I return there that he would kill me. He has threatened to do so on many occasions and I know that he is capable of carrying out this threat.
- 20. After over a year of being forced to go see H against my will, I decided to leave El Salvador. I left on January 11<sup>th</sup>, 2019 and entered the U.S. on January 28, 2019.

## Fear for my children

- 21. I love my children with all my heart, and it has been like torture for me to be apart from them. I did not want to leave them but I thought that it was the best thing so that I could be safe. For now, they are living in San Alejo. My daughter is living with my parents and I am able to speak with her frequently. Overall, my daughter is doing ok but I know that my mother is worried about what happens when H gets out of jail and that they could be targeted by him. I know that H is a child molester and he has already been convicted of this type of offense. He did this to his step-daughter and I fear that he could do it to K too.
- 22. My son O is living with the mother and stepfather of my ex-partner. I am also afraid of the stepfather of my ex-partner and the situation that Oscar is currently living in. He tricked me and forced me to sign over custody of Oscar to them even before I came to the United States. He is a member of an extermination group. This is a form of vigilante group that were formed supposedly to combat the gangs and kill gang members. However, they will kill for hire and indiscriminately. They are also involved in drug trafficking. His wife is a kind person, but he exerts a lot of control over her. I am very worried about my son O living in this type of environment, surrounded by violence.

# My fears of returning to El Salvador

23. I continue to suffer a great deal because of what I went through in El Salvador. It is hard for me to sleep, and I often cry when I think about the rapes that I endured and my separation from my children. I feel afraid of all men because of H's abuse of me. I am also afraid because H has relatives here in the US and they often try to contact me via social media through my relatives. I know that if I go back to El Salvador, H will kill me or will have someone else kill me.

- 24. There is so much violence against women in El Salvador, and people there believe that a woman is a man's property. I could not go to the police for protection. The guards at the jail did nothing to help me, even though they knew that I was being raped.
- 25. Please let me remain in the United States where I can be safe.

MERA

Date