

July 15, 2020

Submitted via <https://www.regulations.gov>

Lauren Alder Reid, Assistant Director
Office of Policy
Executive Office for Immigration Review
5107 Leesburg Pike, Suite 1800
Falls Church, VA 22041

RE: Comments in Opposition to United States Department of Homeland Security (DHS) and Department of Justice (DOJ) (the Departments) Joint Notice of Proposed Rulemaking (Rule): Procedures for Asylum and Withholding of Removal; Credible Fear and Reasonable Fear Review; [RIN 1615-AC42 / 1125-AA94](#) / EOIR Docket No. 18-0002 / A.G. Order No. 4714-2020

I am an asylee from El Salvador who is writing to express my strong opposition to the proposed rules referenced above. When I had my credible fear interview, I was still in detention. Trying to explain why I was afraid to return to my country was very difficult-- while people normally try to forget traumatic experiences, it was necessary for me to remember what had happened to me. I explained how I was threatened, how I was afraid for my life, and as I did so, I thought about my children and felt a pain in my chest. Talking about the trauma and fear I experienced was hard and painful to recall, and I imagine that many families fleeing to survive experience the same thing.

My journey to the U.S. was not easy. I traveled through Guatemala and Mexico, and I would not have been able to safely apply for asylum in either country because the same danger that exists in El Salvador exists in both countries. The governments of Guatemala and Mexico do not provide protection for people, so people fleeing other countries should not be blocked from seeking asylum in the U.S. for not applying elsewhere first.

I also do not think that it is fair to restrict people's asylum rights because they can't pay taxes on time. For many, seeking asylum is the only form of protection they can receive. People are trying to come here lawfully, and we should not restrict the lawful ways to seek safety.

When I first told my story, I thought that people wouldn't listen to me, that people wouldn't believe me. Now, I truly do not think that I would have won asylum without an attorney. My lawyer supported me and helped me understand the process, yet I know

that many people struggle to find a lawyer which can lead to missing deadlines or making errors on their applications--even lawyers do this sometimes. I do not think that people should be accused of fraud for not understanding the complicated asylum process.

Ultimately, it was important that I had the opportunity to tell my story to a judge, as the environment in court was very different from that of the credible fear interview. I felt much more comfortable sharing my experiences with a lawyer by my side and a judge who was listening to me, and I believe that others should have the same opportunity when presenting their case, including people fleeing gender-based violence, persecution based on LGBTQ status, or gang violence.

I am thankful to my lawyers, my children, and god for giving me the strength to fight for my survival and win my case. Now, my children can go outside and be safe. I hope that we can reject the proposed rules and continue to allow other asylum seekers the same opportunity.

/s/

Iris Doe*

*Pseudonym used to protect confidentiality

Witness Attestation

I, Jesse Franzblau, attest that this statement was drafted by a client of the National Immigrant Justice Center who has won asylum or withholding of removal. The client decided to use a pseudonym to protect her confidentiality.

/s/

Jesse Franzblau
Senior Policy Analyst
National Immigrant Justice Center