

July 15, 2020

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

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**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 asylum seeker from Honduras who is writing to express my strong opposition to the proposed rules referenced above. I fled my country because I was threatened by gangs who believed I had testified against them after I witnessed a gang massacre. My life was in danger, but neither the government nor the police would help me. I had no other option but to leave my country and my children and apply for asylum in the U.S.

My first interview in the U.S was difficult. I had travelled through Guatemala, El Salvador, and Mexico on foot and bus. I was so psychologically harmed by the time I arrived at the Reynosa border that I couldn't explain why I had left my country in the first place. I did not understand the laws of this country and did not realize that I had to establish credible fear for fleeing, so I told the immigration officials that I wanted to take care of my brother who was in a coma. When I finally saw my brother, he told me not to go to immigration court, warning that they would deport me back to the place where my life was being threatened. I looked for a lawyer, but it was hard. I explained that I was in a bad psychological place when I first came to the U.S., that I did not understand the laws of this country, that I had so much trauma because of everything that happened in Honduras, but lawyer after lawyer refused my case. Finally, I found NIJC on reference from a social worker. NIJC believed I had a strong case and took it. Without them, it wouldn't have been possible to win asylum. My lawyers were my sanctuary. They helped me win asylum, helped my son win asylum, and here we are, lawfully.

I left Honduras out of necessity, not choice, and many other people are forced to make the same decision every day. No one wants to risk their lives to get to the U.S., and people who leave their country suffer horribly along the way. Even after arriving at the

border, the trauma and frustration continues. Imagine how difficult it would be to explain your trauma if you were detained, scared, and without a lawyer.

And yet, there are many unjust obstacles being set up to make this difficult process even more difficult, including requiring asylum seekers to apply for asylum in a different country before coming to the U.S. or blocking people from obtaining asylum if they failed to pay their taxes. While I technically could have attempted to seek asylum in Mexico, the same gang violence that I fled in Honduras exists in Mexico, and their criminal network can locate people all throughout Central America. I also had family in the U.S., but none in Mexico. Furthermore, of course, if an immigrant has their papers and can work, then they should pay taxes on time. But if someone doesn't have a job, has difficulty finding work legally, or does not understand the rules of this country, then paying taxes on time is difficult.

Many people want to seek asylum and have evidence of the persecution that they fled yet are afraid of seeking relief lawfully for fear of deportation. These people, including people who fled domestic violence, persecution based on LGBTQ status, or gang violence, deserve to have the opportunity to present their case to a judge. Blocking them from doing so would be deeply unjust.

The opportunity to seek asylum gives people fleeing violence hope. Closing the doors on this hope would be cruel, and I know that if these changes had been adopted earlier, they would've hurt me and my family. Fleeing my country and leaving behind my children has shown me how difficult the process of seeking asylum already is, and we should not complicate an already difficult process for people who are fleeing death and torture. For these reasons, we should not adopt the proposed rules referenced above.

/s/

Ronda Doe\*

\*Pseudonym used to protect confidentiality

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#### 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