SAMPLE Exhibit Index for ACA Country Conditions [Ecuador, Guatemala, Honduras and Uganda].

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***Practitioners should undertake their own research and should update citations and country conditions and specifically tailor their response to each client's individual case.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
CHICAGO, ILLINOIS

In the Matter of **CLIENT** In removal proceedings	No. A Individual Hearing:

INDEX OF EXHIBITS

EXHIBIT	DOCUMENTS CONCERNING COUNTRY CONDITIONS IN ECUADOR	PAGE
A1	*World Report 2024: Ecuador*, HUMAN RIGHTS WATCH, 2024. AVAILABLE AT: https://www.hrw.org/world-report/2024/country-chapters/ecuador "In a context of fragile democratic institutions, Ecuador has seen a sharp increase in violence and activity by organized crime, which took homicide rates to unprecedented levels." "Longstanding, unaddressed structural problems, including limited enjoyment of social rights, have led to chronic protests and led a growing number of migrants and asylum seekers to leave Ecuador and head north." "Allegations of corruption, lack of enforcement of Indigenous peoples' rights, restrictions on access to abortion, and limited protection of children and lesbian, gay, bisexual, and transgender (LGBT) people remain serious concerns." "In June 2023, Ecuador's Ombudsperson's Office opened a non-judicial investigation, in collaboration with COCASEN, a coalition of civil society organizations working on children's rights, into institutional sexual abuse against adolescents and other children."	1-8

	"Ecuadorian human rights organizations and UN experts warned that, in the absence of jobs and education, an increasing number of children are being recruited by criminal groups, subjected to sexual exploitation, and coerced to engage in violence." "The Attorney General's Office reported 77 femicides—murders deemed gender-related—between January and September, more than in the same period in 2022. Civil society groups reported 238 femicides between January and the end of September."	
B1	*Using Gender-Based Violence Frameworks to Eradicate Conversion Practices in Latin America*, OUTRIGHT INTERNATIONAL, Dec. 2024. Available at: https://outrightinternational.org/sites/default/files/2024-12/Using_Gender-Based_Violence_Frameworks_to_Eradicate_CP_LatinAmerica.pdf "Despite . . . advancements, the current political climate in Ecuador, marked by instability and escalating violence, exacerbates the vulnerability of already marginalized populations." "The inaction of the State, particularly the Ministry of Women and Human Rights and the Undersecretariat for Diversities, is a factor that aggravates the situation. The lack of forceful measures to prevent violence, protect victims and punish those responsible generates a climate of impunity and distrust in institutions." "The Ecuadorian case underscores the challenges of relying solely or primarily on punitive measures to address conversion practices. While criminal legal frameworks are often perceived as a foundation for accountability, they frequently fall short in contexts where religious and familial spaces are deeply involved. The threat of criminal penalties for perpetrators can create significant disincentives for survivors to come forward, driven by fear of ostracism or reprisals, or, alternatively, by affective bonds." "The investigation conducted by Mujer & Mujer examines the persistence and impact of conversion practices in Ecuador, drawing attention to how these harmful interventions are sustained within a socio-cultural context marked by heteronormativity and patriarchal norms. Conversion practices in Ecuador are deeply embedded in family dynamics, religious influence, and institutional structures. The study sheds light on how societal stigma and cultural expectations, combined with insufficient state regulation, create an environment where conversion practices are tolerated and perpetuated."	9-38
C1	Lena Savelli, *Shining a Light on Gender-based Violence in Ecuador*, United Nations Development Coordinator Office, March 2025. Available at: https://un-dco.org/stories/shining-light-gender-based-violence-ecuador "Sixty-five per cent of women in Ecuador have suffered some form of violence during their life.'" "The dramatic increase in drug-related violence and insecurity that has plagued Ecuador over the past few years is exacerbating the challenge we face in tackling gender-based violence. Unfortunately, women and girls are, once again,	39 – 47

	deeply affected. In addition to increases in femicides, a study by UN Women shows that women and girls are increasingly at risk of other forms of violence and coercion, including forced recruitment into criminal gangs, human trafficking and sexual exploitation.	
D1	Agnes Edeby, *Prevalence and sociogeographical inequalities of violence against women in Ecuador: a cross-sectional study*, Int J Equity Health, Jun. 2021. Available at: https://pmc.ncbi.nlm.nih.gov/articles/PMC8170937/ "Violence against women (VAW) is a vast public health problem in Latin America." "Nearly two-thirds (64.86%) of the participating women had experienced some form of violence during their lifetime, mainly psychological violence (56.92%). The second most prevalent type of violence was physical (35.44%) closely followed by sexual (32.67%). Almost one-fifth (16.38%) stated to have experienced some form of economic violence." "Our study showed that VAW is a common event in Ecuador and identified several sociogeographical inequalities that varied depending on the type of violence." "Women who have not been able to get an education are more likely to be in a socially disadvantaged position where many are unemployed and dependent on others for money, most often a male partner. This dependency alongside social norms that accept gender inequality and violence, as well as a lack of awareness of their rights, constitute obstacles for women to seek help and combat the abuse." "Although the country has taken some steps in the right direction, current policies and laws to protect women need to be expanded and effectively implemented to reduce VAW in Ecuador."	48 - 76
E1	Vanessa Cezarita Cordeiro, *Children of Ecuador*, Humanium, April 2022. Available at: https://www.humanium.org/en/ecuador/ "Violence against children, child labour and poor local health standards continue to undermine the country's progress. This means that children will inevitably struggle to live within the full scope of their fundamental rights." "Despite education in Ecuador being free, children face several barriers to accessing education such as the inability to afford school uniforms and textbooks, a lack of physical accessibility to school buildings and teachers, inadequate educational infrastructure as well as unreliable public transport systems." "Approximately 65% of school-aged migrant and refugee Venezuelan children living in Ecuador are not enrolled in education. Although identity documents are	77 - 87

	not required to enroll in schools, local officials demand identity documents from migrant and refugee children." "Ecuadorian children are subjected to commercial sexual exploitation and trafficking. Refugee and migrant children, specifically those of Colombian, Venezuelan and Peruvian descent as well as Indigenous and Afro-Ecuadorian children are at a heightened risk of child prostitution and sex trafficking." "Refugee and migrant children from Colombia and Venezuela are particularly vulnerable to exploitative labour such as street work and forced begging."	
	DOCUMENTS CONCERNING COUNTRY CONDITIONS IN GUATEMALA	
F1	Statement of Dr. Elizabeth G. Kennedy, Ph.D., Country Conditions Expert on Guatemala, with curriculum vitae (April 2024) "Females are disproportionately impacted by rape committed by numerous actors, including relatives, intimate partners, authorities, death squads and organized crime members. The likelihood of a girl or woman being raped by one or several of these actors in Guatemala definitively approaches more likely than not, and for the poor, indigenous and Garifuna, is probably almost certain." "Over 84 percent of all crimes go unreported in Guatemala. Over 99 percent of sexual violence is unreported. "Guatemalan authorities got convictions in 12 percent or less of all homicides and 11 percent or less of all rapes committed between 2014 and 2022. By registering among the lowest convictions rates for this crime, the State signals its lack of concern for rape victims/survivors who are predominantly female." "In general, safe relocation for more than a few months is impossible for the vast majority of the population without economic resources in Guatemala. Past victims of abuse face especially severe challenges." "Girls and women have been murdered, disappeared, raped, tortured and otherwise harmed after their deportation by the same or different actors targeting them before they fled. State security forces are among those who harm them." "Deported adolescent girls and women are very vulnerable to harm by gangs, especially if they try to attempt life away from their families." "Although Guatemala has among the world's highest levels of crime, depictions of the country as one of "generalized crime" are inaccurate, based upon systematic searches of the Guatemalan press triangulated with interviews and governmental statistics." "Beyond fearing State agents as persecutors, rather than protectors, another reason for underreporting is a belief that the authorities will do nothing.	88 - 143

	Guatemalans do not trust the authorities. Impunity, corruption, and collusion are widespread among Guatemalan law enforcement. There are numerous accounts of individuals taking the step of reporting violence to the police, only to have the perpetrators of that violence learn of their actions, oftentimes from the police or prosecutors themselves, and take retaliation against the person who reported." "Systematic news searches of almost every neighborhood done to date have returned at least one article on a witness or reporter of crime being murdered, such that residents know through lived experience the consequences for reporting." "For rape, Guatemalan authorities only formally filed charges in between 14 and 19 percent of cases. More shockingly, they got convictions in less than 11 percent of cases. Of cases that made it to court, a large number actually ended in absolution, demonstrating the authorities' inability to consistently get convictions even in the few cases it tries." "To the extent these disappeared persons are found, they are more often than not dead, buried in unmarked graves, and frequently mutilated or cut into pieces. This crime is meant to send a message and to cause the family and community ongoing psychological suffering. Girls, women and their families that I interviewed indicated that gangs are more likely to disappear girls and women previously involved with them or who refused to become involved with them." "The women stated that gangs believed they owned them. This included gangs believing they had ownership of their earnings, bodies and children." "State authorities have been largely ineffective at protecting the population from cartel, gang or private violence, and Guatemalan security forces have themselves committed extrajudicial executions, sexual assaults, enforced disappearances, and torture throughout the country, especially in particularly dangerous neighborhoods that many people flee. Authorities, like cartels and gangs, are able to communicate with each other to track down a person who moves from one part of the country to another." "Regardless, when forced into hiding, individuals or families often struggle to financially provide for themselves and their families, to keep themselves safe and to maintain overall well-being. Such complex interaction usually means that individuals or families cannot stay at their internal relocation for long periods and must therefore return to their previous residences. There, they often confront their original persecutors, even after years." "Impunity is very near absolute for crimes committed by all actors against the female population, who face higher sexual violence rates.	

G1	*Situation of human rights in Guatemala - Report of the United Nations High Commissioner for Human Rights*, UNITED NATIONS OFFICE OF THE HIGH COMMISSIONER AND SECRETARY-GENERAL, Jan. 21, 2025. Available at: https://www.ohchr.org/en/documents/country-reports/ahrc5822-situation-human-rights-guatemala-report-united-nations-high. "Violence against women and girls remained a source of great concern for OHCHR. Almost half of Guatemalan women have suffered some type of violence in their lifetime.14 As at November 2024, the Women's Observatory of the Public Prosecution Service had recorded 50,645 cases of violence against women, including 723 femicides and violent deaths.15 Despite the magnitude of these figures, care for women victims of violence remains limited. According to data provided by the Office of the Prosecutor for Women of the Public Prosecution Service, since the establishment of the model for the provision of comprehensive care to women victims of violence in 2021 up until 30 September 2024, a total of 30,629 victims had received assistance."	144 - 159
H1	*Freedom in the World 2025 – Guatemala*, FREEDOM HOUSE. Available at: https://freedomhouse.org/country/guatemala/freedom-world/2025. "The constitution prohibits discrimination based on gender, but women continue to face gender-based inequality; women are usually paid less for their labor than men, and sexual harassment in the workplace is not penalized." "Physical and sexual violence against women and children remains high, with perpetrators rarely facing prosecution." "Sexual exploitation particularly affects vulnerable groups, including children, LGBT+ people, and Indigenous people. Gangs often force children and young men to join their organizations or perform work for them."	160 – 177
I1	Stephanie Wallace, *Guatemala: lasting legacy of gender-based violence and state impunity. Violence against women and girls has been normalised, not reduced, since the conflict*, Latin American Bureau, Nov. 2021. Available at: https://lab.org.uk/wrv-guatemala-legacy-gender-based-violence/ "Despite this acknowledgement, more than two decades on Guatemalan women still face precarious and complicated conditions. This is visible in the high rates of gender-based violence and femicide that plague Guatemalan society. In addition, impunity for these crimes is still widespread, meaning many women are unable to experience a sense of justice." "In 2020 alone, according to the Public Ministry's Women's Observatory (Observatorio de las Mujeres del Ministerio Público) 455 femicides were registered, with 199 daily average reports of violence against girls and women."	178 – 181
J1	*Guatemala: Events of 2024,* HUMAN RIGHTS WATCH, Dec. 8, 2024. Available at: https://www.hrw.org/world-report/2025/country-chapters/guatemala	182 – 189

	"There are also other significant challenges, including high levels of human trafficking, extortion, and violence against women." "The 2023 National Survey of Household Quality and Well-being (ENCABIH) revealed that 48 percent of women have suffered some type of gender-based violence at least once in their lifetime. In the first half of 2024, civil society groups reported 206 violent deaths of women, with 44 percent classified as femicides. Impunity in cases of violence against women remains the norm."	
	DOCUMENTS CONCERNING COUNTRY CONDITIONS IN HONDURAS	
K1	*A Cut Too Deep: US Foreign Aid Withdrawals and the Collapse of Protection for Women and Girls in Honduras*, Women's Refugee Commission, July 2025, available at: https://www.womensrefugeecommission.org/research-resources/a-cut-too-deep-us-foreign-aid-withdrawals-and-the-collapse-of-protection-for-women-and-girls-in-honduras/ "Deep-rooted institutional corruption and documented collusion between police forces and organized criminal networks have severely undermined the legitimacy of security institutions, enabling GBV to persist with near-total impunity...In this context, shelters are scarce, and legal pathways are slow or inaccessible. Many survivors perceive the police not as protectors but as part of the threat." "Sexual violence is particularly widespread: over 100,000 medico-legal exams related to sexual violence were conducted in the past decade, most involving women and girls…In 2022 and 2023 alone, 7,620 cases of sexual violence were reported— roughly one rape per hour…Yet, actual numbers are likely much higher: according to a national survey on violence against women and girls, only 4 percent of survivors report incidents to the authorities." "Most approved laws and policies aimed at supporting GBV survivors remain unregulated—meaning they lack dedicated funding and do not establish mechanisms to ensure institutional compliance." "'The women being deported left because their lives were at risk. Now that they've returned, they face double or even triple the danger—and tragically, 13 there are no funds or resources to support them.' This quote from the director of a community-based organization reflects a broader crisis." "The availability of GBV services in Honduras has drastically declined, with more than 21 organizations scaling back or terminating support in 2025. Core services—legal aid, psychosocial support, and emergency assistance—are now limited or entirely unavailable in high-risk areas. Despite rising needs, there is little state action to fill the gap. Nowhere is this failure more evident than in the collapse of the national women's shelter system. Following US aid cuts, shelters lost funding, staff, and operating capacity. In San Pedro Sula, one key shelter preparing to serve displaced women was forced to close in April 2025. Although a shelter law exists, it remains unregulated, and state funds have been diverted toward unbuilt facilities. Referral networks that once enabled comprehensive care have also broken down, leaving survivors trapped in fragmented systems	190 – 224

	with no clear path to protection. The current crisis exposes not only a funding vacuum, but a structural lack of political will to prioritize women's lives." "There are no formal programs in place to support women who migrate, return, or those who experience GBV during their transit. The risk of exploitation is escalating, and frontline organizations warn that, in the absence of humanitarian presence, women are left entirely unprotected."	
L1	*2023 Country Report on Human Rights Practices: Honduras*, U.S. Department of State. Available at: https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/honduras/ "The human rights situation in Honduras was problematic, due to the prolonged estado de excepción (state of emergency) and an increase in gender-based violence. The Office of the UN High Commissioner for Human Rights raised concerns regarding illegal detentions, excessive use of force, and abuses committed during warrantless home searches committed in the context of the estado de excepción. Violence and extortion persisted at high levels, due to competition among gangs." "Significant human rights issues included credible reports of: arbitrary or unlawful killings; torture or cruel, inhuman, or degrading treatment or punishment by government agents; harsh and life-threatening prison conditions; arbitrary arrest or detention; serious problems with the independence of the judiciary…serious government corruption; extensive gender-based violence, including domestic violence, sexual violence, and femicide…" "Criminal groups, including local and transnational gangs and narcotics traffickers, were significant perpetrators of violent crimes and committed acts of homicide, torture, kidnapping, extortion, human trafficking, intimidation, and other threats and violence directed 49 against…women, and other vulnerable populations. The government investigated and prosecuted some of these crimes, but impunity was widespread." "Although the law prohibited such practices, there were credible reports of abuses by members of the security forces…Corruption, a lack of investigative resources, and judicial delays led to widespread impunity, including for members of security forces." "Prison conditions were harsh and at times life threatening due to gross overcrowding, malnutrition and lack of medical care, and abuse by prison officials. The government's failure to control criminal activity and pervasive gang-related violence contributed significantly to insecurity." "The government failed to control pervasive gang-related violence and criminal activity within the prisons. Many prisons lacked sufficient security personnel. Prisoners had access to weapons and other contraband, inmates attacked other inmates with impunity, and inmates and their associates outside prison threatened prison officials and their families." "Abuse of Refugees and Asylum Seekers: Transiting migrants, forcibly displaced populations, and asylum seekers with pending cases were vulnerable	225 - 259

	to abuse and sexual exploitation by criminal organizations. Women, children, and lesbian, gay, bisexual, transgender, queer, or intersex (LGBTQI+) individuals were especially vulnerable to abuse."	
M1	Laia Corxet Sole, *Women's Bodies As A Battlefield: Gender-Based Violence In Honduras*, Security Distillery, Mar. 15, 2023, available at https://thesecuritydistillery.org/all-articles/womens-bodies-as-a-battlefield "Honduras has been named on several occasions the worst place in the world to be a woman. High levels of gender-based violence persist in a climate of chronic generalised violence. The obvious threat of criminal groups, gangs, and corruption, belies the less perceptible threat of an embedded patriarchal and sexist culture. Women and young girls experience a wide range of violence in both private and public spaces that perpetuate their vulnerability and victimisation in a state that is unwilling and unable to protect them, driving many of them to flee the country." "The NTCA countries are male-dominated societies in which children and women alike are subjected to violence with impunity, and extreme levels of gender-based violence in the region have been identified as one of the major driving forces for both internal displacement and external migration towards Mexico and the United States." "There is a systematic disregard by authorities for gender-based violence, which further victimises women and normalises this type of violence in society. Abuse, sexual assault, and domestic violence are a widespread norm in both public and private spheres, yet there is little support from state institutions for victims to escape vulnerable situations. A high percentage of abuses go unreported, as women fear being dismissed and further victimised by police and judicial authorities. Moreover, even those who do report abuse find little support, since the impunity rate for genderbased violence in Honduras is over 90%, meaning, reports rarely end up leading to an investigation or a conviction." "Machismo (the Spanish term that refers to cultural misogyny) is ubiquitous in Honduras and in most of Central America. Patriarchal and sexist beliefs are the cultural norm, and traditional gender roles are strictly enforced. The pervasiveness of macho culture is a crucial element in the normalisation of gender-based violence, since it perpetuates the belief that women are lesser beings subject to male authority and domination, and therefore violence inflicted upon them is legitimate." "Honduras' cultural misogyny, however, reaches extreme levels when it intersects with gang culture. In a society that emphasises gendered hierarchies, gang members demonstrate extreme, hypermasculine attitudes in order to assert their dominance. Violence and control over women is an expectation for gang members to gain the respect of other members and assert dominance over the population." "Violence against women living in gang-controlled areas, particularly rape and sexual assault, is also used as a tool for control and punishment of the women	260 - 269

	themselves and their family members; escaping the violence is virtually impossible." "Crimes committed against women in gang-controlled areas are more likely to go unpunished and unreported, and girls and women with gang associations – whether voluntary or not – are prosecuted and subject to additional abuses, including sexual assault, beatings, disappearances, and femicide." "The Honduran State has failed to establish a system that protects women. Gender-based violence in all its forms is normalised and legitimised in a society where violent expressions of hypermasculinity are the norm. Violence against women is ultimately an expression of the systematic and pervasive patriarchal and misogynistic ideas that permeate Honduras' society and state, and it is a reflection of the unequal power dynamics between men and women in the region. When this patriarchal normalisation of violence against women intersects with the maras' brutality, however, the violence against women reaches extremely disturbing levels."	
	DOCUMENTS CONCERNING COUNTRY CONDITIONS IN UGANDA	
N1	*Uganda: Events of 2024*, HUMAN RIGHTS WATCH, 2025. Available a: https://www.hrw.org/world-report/2025/country-chapters/uganda "Uganda's human rights environment remains restrictive, with the government clamping down on free expression, peaceful assembly, and dissent." "Violence against women and girls in Uganda continues to be prevalent." "A joint report by Human Rights Watch and the Initiative for Social and Economic Rights found that Uganda's lack of government-funded pre-primary education worsens wealth inequality and has lifelong negative consequences. Only 1 in 10 children aged 3 to 5 are enrolled in licensed pre-primary schools, while 60 percent attend no pre-primary school. Private preschool fees hinder access for low-income families, leading to poorer primary school performance and increased dropout rates for those who miss pre-primary education."	270 – 275
O1	*How the limited access to services for victims of Gender Based Violence affects Uganda's gender SDG targets*, United Nations Entity for Gender Equality and the Empowerment of Women (UN Women), 2025. Available at: https://africa.unwomen.org/en/digital-library/publications/2025/11/how-the-limited-access-to-services-for-victims-of-gender-based-violence-affects-ugandas-gender-sdg-targets "Uganda continues to grapple with high levels of gender-based violence (GBV), with the 2016 Uganda Demographic and Health Survey showing that 51 percent of women experience physical violence, 22 percent experience sexual violence, and 56 percent face emotional abuse. Despite this widespread prevalence, reporting remains extremely low. Domestic violence cases recorded by police	276

	have barely changed—17,533 in 2021 compared to 17,698 in 2022—highlighting persistent barriers that prevent survivors from seeking help." "However, actual utilisation of GBV services remains very low at only 10 percent. Even among survivors who are aware of these services, many still do not seek support. Confidentiality concerns, stigma, financial barriers, and limited capacity among local leaders—who are often the first point of contact—continue to hinder victims from accessing timely protection and justice."	
P1	Busiku Esther Sharon, *Understanding gender-based violence in Uganda: It is more than just physical abuse*, Westminster Foundation for Democracy, Dec. 2024. Available at: https://www.wfd.org/commentary/understanding-gender-based-violence-uganda-it-more-just-physical-abuse "GBV can manifest in many forms and not just the physical as is normally thought. Uganda's 2019 National Policy on Eliminating GBV outlines several forms of abuse, demonstrating how deeply entrenched it is in society. Physical violence includes acts like battering, slapping, and beating. Sexual violence, also referred to as Sexual and Gender-Based Violence (SGBV), encompasses rape, defilement, incest, sexual harassment, and sexual exploitation. Harmful traditional practices are another category, which includes female genital mutilation, early or forced marriages, dowry-related violence, and the culturally specific practice of labia pulling, which remains controversial." "Economic violence often goes unnoticed but can take the form of denying someone access to financial assets or forcing them to surrender their income. Emotional and psychological violence is also widespread and includes verbal abuse, confinement, and even harassment via technology, such as online bullying or humiliation on digital platforms." "Gender-based violence manifests in everyday actions that many fail to recognise. For instance, some women are forced to hand over their salaries to their partners, denying them financial independence. Others are pressured to leave their careers or are barred from taking jobs that their partners view as threatening or inappropriate. Verbal abuse, such as shouting at a partner, colleague, or family member, is another example of GBV that is often normalized. Similarly, denying someone their basic human rights, including access to necessities, reflects a deeper level of control and abuse."	277 - 279
	OTHER EVIDENCE	
Q1	*Senate Foreign Relations Committee: Democratic Staff Report, "Cruelty, Coercion, and Legal Contortions: The Trump Administration's Unsafe Asylum Cooperative Agreements with Guatemala, Honduras, and El Salvador*, The Committee on Foreign Relations, Jan. 2021. Available at: https://www.foreign.senate.gov/imo/media/doc/Cruelty,%20Coercion,%20and%20Legal%20Contortions%20--%20SFRC%20Democratic%20Staff%20Report.pdf	280 - 313