

Declaration Dennis Ngo in Support of Application for Asylum, Withholding of Removal, and
Protection under the Convention Against Torture of
Julian Ngongbo, A 123-456-789
In Removal Proceedings

I, Dennis Ngo, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. My name is Dennis Ngo. I was born in the village of Bakebe, Cameroon, on July 1, 1994. I am a citizen of Cameroon. A copy of my Cameroonian passport is attached.
2. I am currently living in Lanham, Maryland. I came to the United States in January 2018 and was granted asylum in March 2018. I write this declaration in support of Julian Ngongbo's application for asylum.
3. I met Julian in the fall of 2015 when we were both studying at the University of Buea. Julian and I regularly discussed the unfair treatment of Anglophones in Cameroon. As young, promising students, we felt that our life opportunities were severely limited by Francophone leaders' practices and policies. Yet we had no meaningful political process to voice our grievances.
4. An organization called the Southern Cameroons National Council (SCNC) held regular meetings for University of Buea students. The SCNC advocates for the rights of the Anglophone minority in Cameroon as well as a peaceful secession from the country. SCNC's message is entirely non-violent. Although I was initially afraid to attend SCNC meetings due to the risk of police disruption, I felt that the cause was worth the risk. I attended multiple SCNC meetings with Julian beginning in 2016.

Commented JD1: If the witness is preparing his/her own statement, it is unlikely they'll have a formal case caption like this. It is fine for them to use a more informal title like "Declaration of Dennis Ngo."

Commented JD2: This witness speaks English, so he did not need the declaration interpreted. If the witness you are working with speaks another language, they can write the statement in their own language. You should submit the statement with an English translation and certificate of translation. Please see the sample certificate of translation provided on our training page.

Commented JD3: You should make sure that the full name on the witness's ID card matched the name referenced here in the declaration and that the date of birth is consistent. Please note that if the passport is not in English, you need to also include an English translation of the ID card and a separate certificate of written translation.

Commented JD4: The witness should be sure to explain how they know your client and any relevant details about their relationship. Here, it was important to highlight the conversations Dennis and Julian had about the mistreatment of Anglophones in Cameroon since that is relevant to Julian's asylum application.

5. During the summer of 2017, Julian and I attended a SCNC meeting that was violently disrupted by the police. The meeting took place in a walled, private courtyard behind a house. Out of nowhere, we heard shouting. Suddenly, uniformed police officers stormed the meeting and began beating attendees. Fortunately, Julian and I escaped through a back door together and made it home safely. That experience really scared me. Julian and I spoke about what happened and both decided that we would not let it deter our important work. We both continued to attend meetings after that.
6. In December 2017, I was arrested by Cameroonian police officers on my way home from a SCNC meeting. I was detained, beaten, and tortured for nearly 30 days until my family bribed a prison guard to secure my release. Fearing for my life, I fled Cameroon after that. I traveled to Nigeria, where I obtained a plane ticket to Mexico and made my way up to the United States.
7. In April 2018, shortly after I received asylum and was released from immigration detention, Julian contacted me through Whats App. He told me that he had been arrested, detained and tortured by Cameroonian authorities because of his involvement in Ghost Town Day, an event that protested the Francophone treatment of Anglophones. I was so sorry to hear about Julian's experience, but not at all surprised given what I had gone through. Julian told me that he was planning on coming to the United States to seek protection.
8. Julian's experiences were very similar to mine. We both suffered greatly because of our involvement with SCNC and opposition to the Cameroonian government's mistreatment of Anglophones. Julian's return to Cameroon could mean arrest, detention, and even death, just as mine would.

Commented [JD5]: You should pay special attention to dates to make sure they are consistent with your client's own recollection of events.

Commented [JD6]: Be sure to include specific details about the declarant's personal knowledge of the client's persecution.

When fact witnesses reference details, it is critical that the details do not contradict the client's story. If you are concerned about the details in a witness's statement, try to have a follow-up conversation with both your client and the witness to reconcile the inconsistency, if possible. If you are unsure whether it is worth including the fact witness's statement, you should consult your mentor.

Commented [JD7]: Again, it is important to include specific details about the declarant's personal knowledge of the client's persecution. Although Dennis wasn't in jail with Julian, it is important to mention this phone call that took place shortly after Julian escaped.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and accurate.

Dennis Ngo

April 15, 2019