

IMMIGRATION JUSTICE CAMPAIGN



SAMPLE DIRECT EXAMINATION

Julian Ondobo Ngongbo, A # 123-456-789¹

QUESTIONS	GOAL
<p>Identity/Big Picture</p> <ul style="list-style-type: none"> • Can you please state your name for the record? • What is your date of birth? • Where were you born? • Are you a citizen of Cameroon? Are you a citizen of any additional countries besides Cameroon? • Can you explain in a couple of sentences why you are seeking asylum in the United States? 	<p>Identity</p> <p>Broadly state claim—previously arrested, imprisoned and tortured b/c of political activities and being Anglophone; afraid he'll be killed if forced to return</p>
<p>Childhood & Joining SCNC</p> <ul style="list-style-type: none"> • Where did you spend your childhood? • You mentioned earlier that you are an Anglophone. Is Tinto in an Anglophone region of Cameroon? • What is the highest level of education that you received? Where did you go to University? • You said that you were involved in the Southern Cameroons National Council, or SCNC. When did you become active in this group? 	<p>Establishing Anglophone identity</p> <p>Displaying interest in SCNC mission and explaining how he became involved</p> <p>Telling the Judge about his participation at SCNC meetings beginning in 2016</p>

¹ This direct examination was created based on the Immigration Justice Campaign's fictional client, Julian Ngongbo. You can read the corresponding client declaration [here](#). Please note that direct examinations are entirely fact dependent. This sample should give you a sense of the types of questions you should ask and the sequence, but you will need to draft direct examination questions based on your client's own facts.

<ul style="list-style-type: none"> • Why did you become active in SCNC? • What did you understand as the mission of the SCNC? • What did you like about that mission? • What, if any, types of events did you attend with SCNC? 	
<p>Police Violently Disrupting 2017 meeting</p> <ul style="list-style-type: none"> • Did you ever have trouble because of your SCNC activities? When? • Can you please describe what happened during the summer of 2017 meeting? • What happened to the students who were arrested by the police during this meeting? • How did you feel after this event? • Did you stop participating in SCNC after this incident? • Why not? 	<p>Describing first run-in with police because of SCNC meeting</p> <p>Fellow students being beaten by police, arrested, and jailed</p> <p>Narrowly escaped but still committed to work because wanted to improve his country</p>
<p>Ghost Town Day Arrest, Detention & Beating</p> <ul style="list-style-type: none"> • After the summer 2017 meeting, did you have any further trouble with the police because of your SCNC activities? <ul style="list-style-type: none"> - Arrested for helping to plan 2018 Ghost Town Day • What is “Ghost Town Day?” • Did you have a role in planning Ghost Town Day events? What was your role? • Did you have any problems because of your activities with Ghost Town Day? When were you arrested? What happened? • Where did the police take you? • Can you describe the conditions at the station? 	<p>Demonstrating that Julian had a leadership role in planning the Ghost Town Day Events</p> <p>Police arrested Julian at his house because they knew he’d been involved in distributing flyers</p> <p>Taken to police station where he was held in dirty, crowded, unsanitary conditions</p>

<ul style="list-style-type: none"> • What happened while you were at the police station? Were you physically harmed? Interrogated? • Did the police make any accusations against you while you were held at the station? What did they say? • Did the police transfer you anywhere else? What were the conditions like there? • How many days did the beatings and interrogations you've described go on for? • How long were you held in jail? • Can you please describe the process of how you got out of jail? 	<p>Accused of organizing Ghost Town Day and collaborating with Ambazonian fighters, threatened with going to notorious Kondengui Prion, and interrogated about political activities</p> <p>Julian should provide details of politically motivated beatings</p> <p>Detained for more than 1 week</p> <p>Describe how he escaped jail</p>
<p>Escape from Jail & Decision to Flee</p> <ul style="list-style-type: none"> • Where did you go when you got out of jail? • How did you feel physically? How did you feel emotionally? • What did you do next? • Why did you decide that you couldn't stay in Cameroon safely? 	<p>Forced to stay in hiding at a friend's house</p> <p>Julian was in great physical pain and very scared when released</p> <p>Learned that police were looking for him at University, his house, and his family's house & restaurant. Realized it wasn't safe to stay in Cameroon</p>
<p>Fleeing Cameroon</p> <ul style="list-style-type: none"> • Where did you stay while you were making plans to leave the country? • How did you decide where to go? • Did you obtain travel documents to go to the US? How? • Can you describe what happened on the day you fled Cameroon? • What, if any, safety precautions did you take when you left Cameroon? 	<p>Had to stay in hiding; opportunity presented itself to use a Nigerian passport with US visa</p> <p>Escaped into Nigeria using someone else's passport; then flew to the US using visa</p> <p>Told immigration officials at airport the truth and ended up detained</p>

<ul style="list-style-type: none"> • What happened when you arrived in the United States? 	
<p>Fear of Return</p> <ul style="list-style-type: none"> • Have you been in touch with anyone back home in Cameroon since you've arrived in the US? What have they told you? • Are you afraid to return to Cameroon? • What do you think would happen to you if you are forced to return to Cameroon? • Why would the government do these things to you? 	<p>Family back home say the police are still looking for them</p> <p>Fearful he will be arrested, tortured, detained, and possibly killed if returned to Cameroon because of political activities and fact that he is Anglophone</p>