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**AFFIDAVIT OF APPLICANT:**

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**A** **Affidavit of Ms. M**

 ***Applicant***

 *Describing Ms. M’s active membership of the opposition for about a decade. Describing Ms. M’s active participation in protest in a student group called Movimiento 13 when she was a university student. Describing Ms. M’s work at the Universidad Pedagogica Experimental Libertador (Pedagogical Experimental Liberator University) in Caracas, Venezuela. Describing Ms. M’s work with student leaders of the opposition, such as CQ. Describing the murder of CQ in 2015. Describing Ms. M’s active membership in Accion Democratica (Democratic Action), a leading opposition political party. Describing Ms. M’s participation in many opposition protests, which the government tried to repress using weapons. Describing Ms. M’s participation in the election to oppose the establishment of the Asamblea Nacional Constituyente (Constituent National Assembly) on July 30, 2017. Describing the night of July 30, 2017, when the national guard and the colectivos entered Ms. M’s apartment, attacked and threatened her with death. Describing Ms. M’s unsuccessful attempts to report the attack. Describing Ms. M and her son, Adrian going to the U.S. Describing Ms. M’s fear to return to Venezuela because she was attacked and threatened.*

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**WITNESS DECLARATIONS:**

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**B** **Declaration of** **Mr. F with Copy of Venezuelan Identity Document**

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 ***Applicant’s Father***

*Describing Ms. M’s activism since she was a student at the Universidad de los Andes* *(University of the Andes) in Merida, Venezuela. Describing when Ms. M became a member of the political party, Accion Democratica (Democratic Action). Describing Ms. M’s participation in protests when she worked at Universidad Pedagogica Experimental Libertador (Pedagogical Experimental Liberator University, called UPEL from its initials in Spanish) in Caracas. Describing the night of on July 30, 2017 when the national guard and the colectivos entered Ms. M’s apartment and threatened her with death.*

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**C** **Declaration of Mr. FM with Copy of Venezuelan Identity Document**

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 ***Applicant’s Brother***

*Describing Ms. M’s activism as a member of Accion Democratica (Democratic Action). Confirming Ms. M’s participation in election to oppose the establishment of the Asamblea Nacional Constituyente (Constituent National Assembly) on July 30, 2017. Describing the event that took place on July 30, 2017 when the national guard and the colectivos attacked Ms. M at her apartment.*

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**D** **Declaration of** **Ms. CN Aguirre with Copy of Venezuelan Identity Document**

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 ***Applicant’s Work Supervisor***

*Confirming Ms. M’s work with her supervisor, Ms. E at UPEL. Describing Ms. M’s activism at UPEL. Describing Ms. M’s work with student leaders at UPEL. Describing CQ’s death. Describing Ms. M’s message to Ms. E the night of July 30, 2017.*

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**E** **Declaration of Ms. Y with Copy of Venezuelan Identity Document**

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 ***Applicant’s Neighbor***

 *Confirming Ms. M’s participation in election to oppose the establishment of the Asamblea Nacional Constituyente (Constituent National Assembly) on July 30, 2017. Describing the event that took place on July 30, 2017. Describing Ms. M and her family leaving the apartment the next day.*

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**PROOF OF APPLICANTS’ IDENTITIES:**

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**F** **Copy of** **Venezuelan** **Birth Certificate of Ms. M with Certified English Translation**

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**G** **Copy of Venezuelan Passports of** **Ms. M and I-94**

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**I** **Copy of Venezuelan Passports of** **Derivative and I-94**

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**DOCUMENTS AND SOCIAL MEDIA POSTS CORROBORATING APPLICANT’S EXPERIENCES IN VENEZUELA:**

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**K Copy of Ms. M’s bachelor’s degree from Universidad de los Andes in nutrition and dietetics Certified English Translation**

**150**

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**L Copy of *Accion Democratica* (Democratic Action) Record of Membership for Ms. M with Certified English Translation**

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**M Copy of Ms. M’s Complaint to *Ministerio Público de la República Bolivariana de Venezuela* (Public Ministry of the Bolivarian Republic of Venezuela)with Certified English Translation**

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**N Copy of Ms. M’s Complaint to the *Comisión de Política Interior de la Asamblea Nacional* (National Policy Commission of the National Assembly)with Certified English Translation**

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**O Copies of Ms. M’s Instagram Posts with Certified English Translations**

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 ***Showing her participation in opposition protests, damage to Ms. M’s apartment building due to the raid on July 30, 2017.***

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**COUNTRY CONDITIONS EVIDENCE:**

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**P** **U.S. Department of State, Bureau of Democracy, Human Rights and Labor, *Venezuela 2017 Human Rights Report* (2018)**

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*Describing large-scale protests in Venezuela in the spring and summer of 2017. Reporting about 125 deaths during these protests and thousands of injuries. Reporting that Venezuelan security forces and pro-government* colectivos *(paramilitaries) used excessive force against protestors. Reporting “indiscriminate household raids, arbitrary arrests, and the use of torture to deter protesters.” Describing the “fraudulent” election on July 30, 2017 to choose representatives for the National Constituent Assembly, which the opposition boycotted and heavily protested.*

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**Q** **Human Rights Watch, *Venezuela Country Summary* (January 2018)**

**245**

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*Reporting on violent crackdowns on anti-government protests by Venezuelan security forces and* colectivos *(pro-government paramilitaries). Reporting that security forces employed excessive force and perpetrated “egregious human rights violations” against protestors.*

***\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

**R** **Human Rights Watch & Foro Penal, *Crackdown on Dissent: Brutality, Torture, and Political Persecution in Venezuela* (2017)**

**253**

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*Describing widespread violence and abuse, including excessive use of force and torture, by Venezuelan security forces and pro-government* colectivos *(paramilitaries) against anti-government protesters and detainees. Reporting 88 documented cases involving at least 314 people who were victims of serious human rights violations during the crackdown on protestors across Venezuela between April and September 2017. Documenting six cases of security force or* colectivo *raids targeting residential buildings in Venezuela. Reporting widespread impunity for abuses.*

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**S** **Office of the United Nations High Commissioner for Human Rights, *Human Rights violations and abuses in the context of protests in the Bolivarian Republic of Venezuela from 1 April to 31 July 2017 (August 2017)***

**344**

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*Reporting large scale opposition protests from April to July 2017. Reporting a “pattern” of violent security force house raids throughout Venezuela in 2017. Describing the violent crackdown on street protestors, including the use of disproportionate force and torture and the arbitrary arrest of protestors.*

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**T “Democratic Action,” *Encyclopedia Britannica***

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*Describing Democratic Action, the Venezuelan political party.*

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**U Alexandra Ulmer & Mircely Guanipa,*“*Disgruntled Venezuelan state workers seek ways to join opposition vote,” *Reuters* (July 16, 2017)**

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*Describing the “Tascon List,”* *a list of more than 2.4 million Venezuelans who signed in favor of a referendum to remove former President Hugo Chavez from office published in 2004 by, pro-government lawmaker Luis Tascon.*

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**V** **“El opositor y líder Universitario CQ, asesinado a tiros en Caracas,” *Canarias CNNews* (no date) with Certified English Translation**

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*Reporting on the murder of Ms. M’s student mentee, CQ, a student leader at Universidad Pedagoica Experimental Libertador (UPEL). Reporting that Conan was shot because he opposed President Maduro’s government.*

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**W “Estudiante venezolano que denunciaba inseguridad es asesinado por delincuentes,” *El Nuevo Herald* (May 15, 2015) with Certified English Translation**

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*Reporting on the muder of CQ, a university student activist studying at Universidad Pedagoica Experimental Libertador (UPEL).*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**X** **“Vecinos y estudiantes claman justicia por CQ,” *El Nacional*  (May 14, 2018) with Certified English Translation**

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*Reporting that three years after the murder of CQ, the Attorney’s Office “has remained silent” about his murder.*

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**Y** **“Avianca suspends flights to Venezuela amid crisis,” *BBC* (July 27, 2017)**

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*Reporting that Avianca Airlines suspended services to Venezuela due to operational and security reasons.*

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**Z “Una noche de represión, as altos y destrozos vivieron vecinos de El Paraíso y la Quebradita,” *Redacción El Pitazo* (June 14, 2017) with Certified English Translation**

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*Reporting on suppression of an opposition protest in La Quebradita in June 2017*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**AA “Reprimieron con bombas lacrimógenas en La Quebradita,” *El Nacional* (July 26, 2017) with Certified English Translation**

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*Describing police suppression of a protest, including the launching of tear gas grenades, in La Quebradita, Ms. M’s neighborhood, on July 26, 2017*

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**BB “Reprimieron a manifestantes del sector La Quebradita en San Martin,” *El Nacional* (July 30, 2017) with Certified English Translation**

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*Reporting on suppression of protests in La Quebradita on July 30, 2017, the day of the National Constituent Assembly election*

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**CC “Caracas ha sido asediada por la represión la noche de este #30Jul,” *A Todo Momento* (July 30, 2017) with Certified English Translation**

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 *Reporting on suppression of protests in La Quebradita on July 30, 2017, the day of the National Constituent Assembly election*

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**DD Basyl Macías, “GNB activa la represión contra protestas nocturnas en el oeste de Caracas,” *El Carabobeno* (July 30, 2017) with Certified English Translation**

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 *Reporting on suppression of protests in La Quebradita on July 30, 2017, the day of the National Constituent Assembly election*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**EE “Venezuelan election turnout figures manipulated by one million votes: election company,” *Reuters* (August 2, 2017)**

**435**

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*Reporting that the voter turnout for Venezuela’s National Constituent Assembly election held on July 30, 2017 were manipulated up by least 1 million votes.*

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**FF Sibylla Brodzinsky and Daniel Boffey, “40 countries protest Venezuela's new assembly amid fraud accusations,” *The Guardian* (August 2, 2017)**

**439**

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*Reporting that as many as 40 countries have said they would not recognize Venezuela’s National Constituent Assembly.*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**GG Heather Nauert, Department Spokesperson, “Venezuela's Illegitimate National Constituent Assembly,” U.S. Department of State (August 3, 2017)**

**443**

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*Press statement describing the Venezuelan National Constituent Assembly “the illegitimate product of a flawed process designed by the Maduro dictatorship to further its assault on democracy.” Criticizing the election for the National Constituent Assembly and stating that the U.S. will not recognize the assembly.*

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**HH** **“Video Shows Notorious ‘Colectivo’ Leader Greeted by Venezuela Officials,” *InSight Crime*, (Feb. 28, 2018)**

**444**

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 *Reporting on collusion between* colectivos *(pro-government armed paramilitaries) and government officials and the impunity* colectivos *enjoy. Reporting that* colectivos *have received military training and weapons from President Maduro and work alongside state security forces.*

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**II “Patricia Torres and Nicholas Casey, “Armed Civilian Bands in Venezuela Prop Up Unpopular President,” *New York Times*, (Sept. 4, 2018)**

**448**

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 *Reporting that* colectivos *(pro-government paramilitaries) are trained and armed by the Venezuelan government. Reporting that* colectivos *suppress anti-government protestors violently alongside National Guardsmen and other security forces.*

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**JJ Pedro Pablo Peñaloza, “Las bandas paramilitares chavistas que siembran el terror en Venzuela: los colectivos,” *Univision* (April 30, 2017) with Certified English Translation**

**453**

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*Describing* colectivos*, Venezuelan pro-government paramilitaries. Outlining violent acts of* colectivos*. Describing how colectivos work alongside state security forces.*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**KK Alexandra Ulmer and Roberta Rampton, “Re-elected, Venezuela's Maduro faces global criticism, U.S. sanctions” *Reuters* (May 21, 2018)**

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*Reporting on the re-election of Venezuelan President Nicolas Maduro in May 2018.*

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**LL Mike Pompeo, Secretary of State, “An Unfair, Unfree Vote in Venezuela” U.S. Department of State (May 21, 2018).**

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*Press statement condemning the “fraudulent” re-election of Venezuelan President Nicolas Maduro on May 20, 2018.*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**MM Alexandra Ulmer and Andreina Aponte, “Venezuela lawmaker, student leader arrested: opposition,” *Reuters* (Aug. 7, 2018)**

**474**

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*Reporting on continuing suppression of the opposition in Venezuela in 2018.*

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**NN Rosalie Méndez Rea, “Arrestados 27 estudiantes de la UPEL de Maracay,”** ***El Carabobeño* (July 2, 2017)**

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*Reporting on the arrest of students from Universidad Pedagógica Experimental Libertador(UPEL), the university where Ms. M worked, because they were protesting.*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*