

## Direct Examination Outline

- Full name for the record
- DOB
- Nationality
- Are you a citizen of any other country?
- Parents and siblings
- When was the last time you left Guatemala?
- Why did you leave Guatemala?

### Childhood

- Who did you live with as a child in Guatemala?
- How was your childhood in Guatemala?
- Where did you attend school in Guatemala?
- How long did you live with your parents?
- Then where did you live?
- How long did you live there?
- How old were you when you left your parent's home?
- Then where did you live?
- Who did you live with?

- Who is [REDACTED]
- How did you meet [REDACTED]
- How old were you when you met?
- When did you meet [REDACTED]?
- When did you two begin to live together?
- Where did you live together?
- Were you ever legally married?
- How did [REDACTED] treat you?
- Why did you feel bad?
- What did [REDACTED] hit you with?
- How did [REDACTED] make you feel?
- Did [REDACTED] ever threaten you?
- Did you try to leave [REDACTED]?
- Where did you go?
- Did [REDACTED] find you?
- What happened when he found you?
- Do you have any children together?
- When was [REDACTED] born?

- Did [REDACTED] ever hit [REDACTED]?
- What did [REDACTED] do for a living?
- Where did [REDACTED] get money?
- How did [REDACTED] hang out with?
- What did these men look like?
- Did they have any distinguishing looks?
- What were the tattoos of?
- What did these men do in your home?
- What did they discuss?
- Did you ever talk to the men?
- Did the men ever ask you to do things for them?
- Did [REDACTED] continue to hit you for your entire relationship?
- Where is [REDACTED] now?
- How did this happen?
- Do you remember what happened the day [REDACTED] was killed?
- Who came over? What were their names?
- Do you know where they went?
- What happened after [REDACTED] left?
- Who informed you of this?

#### **Cooperating with the Detectives**

- Was [REDACTED] death investigated by police?
- How did you participate in the investigation?
- Who did you speak with?
- What did you tell the officers?
- How did the officers know to speak with you about the events you witnessed?
- Why did you want to speak with the officers?
- How did you support the investigation?
- Did you submit a written statement?
- What did you include in your statement to the officers?
- Did you sign the statement with your full name?
- Did you use any other form of identification to sign the document?
- How many times did you speak with the officers?
- Did you ever go to the police station?
- Were you able to identify the two men for the police?
- What was the outcome of the criminal proceedings?
- Were the two men convicted?
- What was their sentence?
- How were you treated by family after [REDACTED] death?
- How old were you when [REDACTED] was killed?
- Where did you live after [REDACTED] death?

- How did you support yourself financially?
- How was [REDACTED] treated after his father's death?
- How long did you live in your mother's home?

- [REDACTED]
- How many times have you been married?
  - Who are you currently married to?
  - When did you meet [REDACTED]?
  - Where did you meet [REDACTED]?
  - When did you begin a relationship?
  - When were you married?
  - When did you move in together?
  - Where did you two live together?
  - Did you work during this time?
  - How does [REDACTED] treat you?
  - Did [REDACTED] work during this time?
  - Where did he work?
  - Do you and [REDACTED] have any children together?
  - When was [REDACTED] born?
  - When was [REDACTED] born?

#### **Threats from the gang**

- Did you ever tell [REDACTED] about [REDACTED]?
- Why not?
- Did you tell [REDACTED] about your testimony against the gang members?
- Why?

- [REDACTED]
- Did you ever talk to [REDACTED] about what happened to his father, [REDACTED]?
  - How did [REDACTED] react when [REDACTED] was mentioned?
  - When did you observe this reaction?
  - Did [REDACTED] ever tell you how he felt about the history with his father?
  - Did anyone ever talk to [REDACTED] about his father?

- Where you ever threatened in Guatemala because of your involvement in the investigation of [REDACTED]'s murder?
- When did the threats begin?
- Where were you when you received these threats?
- How did you receive this threat?
- What did the caller threaten you with?
- When did this happen?



- How did you respond?
- What did you do after you hung up the phone?
- How did you feel after this phone call?
- **Why do you believe this person threatened you?**
- How would someone know you submitted a declaration?
- What did you do after you received this call?
- **How many threatening phone calls did you receive?**
- Who did the caller threaten?
- What information did the caller have on members of your family?
- How did the caller get your phone number?
- Did any member of your family receive threats?
- Did you receive any other threats besides phone calls?
- What did the notes say?

### **Seeking police protection**

- Who did you tell about these threats?
- How did you report these threats?
- When did you go to the police station?
- Which police station did you report to?
- Is this is the same station that investigated ██████'s murder?
- What happened at the police station?
- What protection did the police station offer you?
- Did the police assign an officer to monitor your home?
- Did the police move you and your family to a safe place?
- Where did you go after you reported the threats to the police station?
- Were you safe in your home after making the police report?
- What happened at your home after you made the police report?
- When did this happen?
- What do you remember about that evening?
- How did you feel after the attack?
- **Who do you believe was trying to break into your home?**
- Why do you believe someone would want to break into your home?
- How would someone know where you lived in Guatemala?
- What assistance did the police provide?
- Did you speak with anyone about the attack?
- What did our neighbors tell you?
- What is your neighbor's name?
- What did you do after the night of the attack?
- Where did you go?
- How far away from Palin is your father's home?

### **Filing Report with Ministerio Publico**

- How did moving to your father's home protect you?
- Were you safe at your father's home?
- Why were you not safe?
- Who threatened you?
- What did they threaten you with?
- Did they ever tell you their name?
- Was is the same phone number making the threats?
- **Why would this person want to threaten you?**
- How did this person get your new phone number?
- How did you feel after receiving this phone call?
- Did you report the threat to the police?
- What station did you report this threat to?
- When did you report this threat?
- What did you tell the Ministerio Publico?
- What protection did the Ministerio Public offer you?
- How did the Ministerio Public know you assisted with the investigation?
- What did you have to do to request the protection?
- Did the police offer you protection at your father's home?
- Were you ever threatened after speaking with the Ministerio Publico?
- When were you last threatened in Guatemala?
- What did the caller say?
- How did the caller get your phone number?
- Did you feel safe at your father's home in Guatemala?
- Why do you believe you received all these threats in Guatemala?

### **Fleeing Guatemala**

- What did you do after you received the threatening phone call at your father's home?
- Why did you and your family decide to flee Guatemala?
- Do you trust the Guatemalan government to protect your family?
- How did you and your family pay for your travel to the United States?
- Who did you tell you were leaving Guatemala?
- Where did you go when you fled Guatemala?
- How long were you in Mexico?
- Did you feel safe in Mexico?
- Did you apply for any permanent lawful status in Mexico?
- When did you enter the United States?
- What was your purpose for entering the United States?
- What do you fear will happen if you or your family return to Guatemala?

- Why would someone want to hurt you if you returned to Guatemala?
- Who will want to harm you if you return to Guatemala?
- How would someone find you if you returned to Guatemala?
- How do you feel now that you are in the United States?
- How has this process affected [REDACTED]?
- What type of help does [REDACTED] receive in the United States?
- How have you seen [REDACTED] improve since arriving in the United States?