

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

Juan Manuel MONTES BOJORQUEZ,)

Plaintiff,)

v.)

UNITED STATES CUSTOMS AND)
BORDER PROTECTION et al.,)

Defendants.)

CIVIL ACTION

NO.17-CV-780 GPC NLS

Declaration of Danielle Alessandra Jimenez

I, Danielle Alessandra Jimenez, make this declaration based on my personal knowledge and, if called to testify, I could and would do so competently as follows:

1. My name is Danielle Alessandra Jimenez. I am 19 years old and a resident of Calexico, California. I was born in El Centro, California and raised in Calexico, where I have lived most of my life. I am a United States citizen.

2. I met Juan Manuel Montes Bojorquez (“Juan”) several months ago over Facebook. We were friends and saw each other occasionally. I know that Juan worked in the fields and had studied at the local community college. He is a nice guy and easy to get along with.

3. On or about Friday, February 17, 2017, I invited Juan to come to my house in Calexico on Saturday, February 18, 2017, for dinner with friends. Juan told me he would come.

4. My house is approximately 1.5 miles from the Calexico West Port of Entry. It is in walking distance of the border. There is a Jack-in-Box restaurant on Rockwood Avenue, directly across from the Port of Entry.

5. At some point on Saturday, February 18, 2017, Juan and I communicated via text message or Facebook messenger. He asked me whether I wanted something from Starbucks before coming over to my house for dinner. He brought Starbucks drinks to my house.

6. Approximately five or six people, including Juan and my sister, were at my house on Saturday, February 18, 2017. I do not recall the exact time when everyone arrived at my house, but it was in the late afternoon or early evening.

7. Juan and I talked in the kitchen while I cooked. My other friends watched a movie while I cooked. Eventually we all ate and watched television.

8. None of us talked about going to Mexicali, which is the city across the border in Mexico. We did not go to Mexicali that night.

9. My friends left the house prior to Juan leaving. Juan and I hung out for a while, and he left my house around 10:00 p.m.

10. I recall that Juan said he was going home when he left my house. I told him to text me when he got home, because I wanted to make sure he was safe. I texted him a few times that night, but got no response.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge.

Signed this 12 of July 2017, in Imperial County, California.


Danielle Alessandra Jimenez