

**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 Kamylee Gabriela Zarate

I, Kamylee Gabriela Zarate, 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 Kamylee Gabriela Zarate. I am 23 years old and live in Imperial County, California. I am a United States citizen.

2. I met Juan Manuel Montes Bojorquez ("Juan") in high school. We both attended the same high school, although I believe I was one year ahead of him. I am married to Jose Manuel Zarate, one of Juan Manuel's closest friends. My husband and Juan worked in the fields together. My husband considers Juan Manuel to be like a little brother.

3. Prior to Juan Manuel's deportation, I would see Juan frequently. He always asked my husband for rides to places, and he regularly left his belongings in my husband's car because they worked together. Juan Manuel would leave his phone, his clothes, his work boots, and other random things in my husband's car.

4. Living in a border community, it is very common for young people to go to Mexicali for fun. However, Juan Manuel never went to Mexicali. I remember friends would try to pressure him to go to Mexicali in high school, but he would never go. I did not know his immigration status, but I assumed there was an immigration reason he could not go to Mexico. I just always knew he was not someone who would or could go to Mexico.

5. I recall that my husband and I once drove Juan Manuel to Calexico, because he was meeting a girl from Mexicali there. I remember he told us that he asked her to come to Calexico because he could not go to Mexicali to meet her.

6. On the night of Saturday, February 18, 2017, and into the morning of February 19, 2017, I was with my husband and our children at our home. I recall that my husband started getting multiple phone calls from Juan Manuel. I do not remember the exact time when the calls started, but I think it was sometime between 11:00 p.m. and 3:00 a.m. I told my husband not to answer Juan Manuel because I assumed Juan wanted a ride somewhere, and I wanted my husband to stay home,

and it was already late at night. But Juan kept calling, and so I told my husband to go ahead and pick up the phone.

7. My husband spoke to Juan Manuel in another room and then came back into our bedroom crying. My husband said that Juan Manuel had been deported to Mexico and that Juan Manuel was scared and walking in the streets alone in Mexicali. My husband was very emotional because he was so close to Juan Manuel and felt badly for him.

8. On Sunday morning, sometime between 10:00 and 11:00 a.m., my husband and I left our children with my mother-in-law and drove down to Mexicali to help Juan Manuel. We met him at La Cachanilla shopping center. He looked completely lost and scared. He had a puppy-dog face. I had never seen him look like that. He told us that he had been deported and did not know what to do. He said he had signed a lot of papers. He also told us he was afraid to call his mother because he knew she would be worried and scared that she would never see him again. He was concerned that he would never be able to come back to the United States.

9. My husband and I took Juan Manuel to eat because he was hungry. We bought tacos with cash. I recall Juan Manuel said that he had not been to Mexico in

so long that he did not recognize Mexicali. For example, he mentioned a bridge that he did not know existed because he had not been to Mexicali since he was young.

10. At some point on Sunday, February 19, 2017, when we were with him Juan Manuel called his mother. I could not hear their conversation, but I did see Juan Manuel cry. I know he asked his mother to send him clothes.

11. My husband and I took Juan Manuel to my aunt's house in Mexicali after we ate. Her name is Lily Mendoza. We were at her house for about three to four hours. Juan Manuel ate and tried to sleep there. He had not slept the prior night because of the deportation.

12. Sometime that evening or early night, my husband and I drove Juan Manuel near the port of entry in Mexicali to pick up a bag of clothes that I believe his mother had sent him. After he picked up the clothes, we told him we needed to head back to our children. Juan Manuel told us that he needed to come back to the United States to be with his family. We told him to be patient and that we would see how we could help him.

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13. When we left Juan Manuel in Mexicali, he looked physically fine. There were no signs of bruises or anything else on his body. We later learned that he had been caught by Border Patrol, and I know he is in Mexico now.

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

Signed this 4 of May 2017, in Imperial County, California.

 05-04-17
Kamylee Gabriela Zarate