

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

DAVID BONIFACE,  
NISSANDÈRE MARTYR, and  
JUDERS YSEMÉ,  
  
                    Plaintiffs,  
  
                    v.  
  
JEAN MOROSE VILIENA  
(a.k.a. JEAN MOROSE VILLIENA),  
  
                    Defendant.

Case No. 1:17-cv-10477-ADB

**DECLARATION OF VILFRANC LARRIEUX**

I, Vilfranc Larrieux, declare as follows:

1. Except as specifically indicated, I have personal knowledge of the matters set forth in this declaration. If called upon to do so, I could and would testify competently thereto.
2. I testified under oath before the Court as a witness on Wednesday, March 15, 2023 in the above-captioned civil action filed against the defendant Jean Morose Viliena (“Defendant”) for extrajudicial killing, attempted extrajudicial killing, torture, and arson perpetrated in Les Irois, Haiti.
3. In my trial testimony, I provided evidence regarding the attack on the radio station and the conduct of the Defendant in the lead up and preparation of the attack. Portions of my testimony concerned the involvement of Defendant’s associates, including Meritus Beaublanc and Pierrot Boileau, in this attack and other acts of violence in Les Irois. (March 15, 2023 Trial Tr. 80:1-95:21, 98:24-99:21).
4. On the afternoon of March 18, 2023, my wife Rosemaire Saint Jules, was in front of our family home in Les Irois. Meritus Beaublanc and Pierrot Boileau, who have worked closely

with Defendant ever since his mayoral election, approached my wife and told her that I had denounced them in my testimony in the U.S. They told her that since I had described them as criminals in my testimony, they would now “act like criminals.” They told her that they are waiting for my return to Les Irois and that they will know what to do. My wife is very scared and I am panicked at what these individuals might do to my family in reprisal for having testified against Defendant.

5. My fear is based on these recent events, particularly given the upcoming verdict in this case, as well as the long history of threats and violence from Defendant’s and his associates, to which I have testified to.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on March 20, 2023 in the United States.

/s/ Vilfranc Larrieux  
Vilfranc Larrieux

**CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2023, I caused to be filed electronically a true copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will notify the parties of record via electronic notification.

/s/ Bonnie Lau