

**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 BONNIE LAU**

I, Bonnie Lau, declare as follows:

1. I am an attorney licensed to practice before courts of the State of California and a partner in the law firm of Morrison & Foerster LLP.
2. I have personal knowledge of the following facts and would competently testify thereto if called as a witness in this matter.
3. I have been admitted *pro hac vice* in the above-captioned matter as counsel of record for plaintiffs David Boniface, Nissandère Martyr, and Juders Ysemé (“Plaintiffs”).
4. I submit this declaration in support of Plaintiffs’ Emergency Motion for Protective Order to Bar Harassment and Intimidation of Parties and Witnesses in Conjunction With Ongoing Trial Proceedings (the “Motion”).
5. I recently learned from trial witness, Vilfranc Larrieux, that following his trial testimony last week, Defendant Jean Morose Viliena’s associates in Haiti, including Meritus Beaublanc and Pierrot Boileau approached his wife and told her that since Mr. Larrieux

had denounced them in his testimony in the U.S., they would “act like criminals.” Mr. Beaublanc and Mr. Boileau told Mr. Larrieux’s wife that they are waiting for his return.

6. I also learned from Plaintiff Juders Ysemé that after Defendant testified, he posted a well-known Haitian battle song to his Facebook page. In addition, on March 19, 2023, Pastor William Lebon’s wife received a series of WhatsApp messages from an anonymous number. The first message contained a photo of a machine gun (*see* Ysemé 2023 Decl. Exhibit B) with a caption in Haitian Creole that read: “Take a good look at how you would have died. You may think you are smart to go hiding, but you are here now, it no longer about just speaking, the day is coming.” The second message contained a photo of Mrs. Lebon (*see* Ysemé 2023 Decl. Exhibit C) with a caption in Haitian Creole that read: “The day is here”.
7. I also learned from Plaintiff Juders Ysemé that on March 17, 2023, the day after Franckel Isme testified before the Court, his son, Ruben Isme, who resides in Les Irois, was approached by two individuals who told him that they had heard that Franckel had testified against Defendant and that Franckel and all the other witnesses would get what was coming to them when they returned to Haiti.
8. On March 20, 2023, my colleague Christina Golden Ademola sent Peter Haley, counsel for Defendant, an email regarding Defendant’s witness intimidation and tampering and Plaintiffs’ intention to file an emergency motion with the Court.
9. Given the emergency circumstances which required the immediate filing of this Motion, the parties met and conferred over email.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 20, 2023.

/s/ Bonnie Lau

Bonnie Lau

**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*