

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CENTRAL AMERICAN RESOURCE
CENTER, *et al.*,

Plaintiffs,

v.

KENNETH T. CUCCINELLI II, in his
official capacity as Senior Official
Performing the Duties of the Director of
U.S. Citizenship and Immigration
Services, *et al.*,

Defendants.

Case No. 20-cv-02363 (RBW)

DECLARATION OF YOLANDA MARITZA RAMIREZ MARTINEZ

Pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury, I declare that the following is true and correct:

1. My name is Yolanda Maritza Ramirez Martinez. I was born in El Salvador in 1976, and I currently live in Burke, Virginia.
2. I fled El Salvador and came to the United States because I feared persecution and was afraid for my life. I entered the United States on March 25, 1998 on foot through Brownsville, Texas, and U.S. Border Patrol subsequently detained me and placed me in removal proceedings.
3. I hired an attorney to help me with my immigration case, including by changing the venue of my case from the Immigration Court in Harlingen, Texas to the Immigration Court in Houston, Texas, where I was living at the time. With the help of the attorney, I also applied for asylum based on my political opinion because I was afraid for my life in El Salvador.

4. The Immigration Court in Houston, Texas set a court date for my case but, because I never received the notice from my attorney about my court date, I did not appear for the hearing. Because I did not appear at the hearing, the Immigration Judge in Houston, Texas ordered me removed in absentia on January 5, 1999.

5. Although I had a final removal order entered against me, the U.S. government did not remove me from the United States, and I have resided in the United States since I first arrived in 1998.

6. On March 9, 2001, El Salvador was designated as a country covered by the Temporary Protected Status (“TPS”) program. I applied soon after the designation and received protection under the TPS program, as well as a work permit. I have applied for and received TPS protection each year since then—19 years, in total.

7. I have lived in Virginia since 1999. I am fortunate to have a tight knit family here in the United States and we have made Virginia our home. My husband Fredy is a U.S. citizen. We were married on October 5, 2011 in Arlington County, Virginia. I also have two U.S. citizen daughters—Jacqueline (13 years old), who lives with me, and Claudia (26 years old), who lives in North Carolina.

8. Since I have been in the United States, I have done my best to be a good member of society and abide by the law. I have never been arrested or convicted of any crimes, and I have always worked hard and paid my taxes. Everything I have been able to earn has gone to supporting my children. I believe I would be an excellent U.S. citizen one day if I am allowed to first become a legal permanent resident.

9. On June 11, 2013, my husband filed Form I-130 (Petition for Alien Relative) with U.S. Citizenship and Immigration Services (“USCIS”) to demonstrate that I was related to a U.S.

citizen, a necessary step for me to be eligible to apply for permanent residence. USCIS approved the petition on September 30, 2013.

10. After successfully applying to USCIS for authorization to travel on advance parole through Form I-131, in the spring of 2014 I departed the United States and went back to El Salvador. I returned to the United States in May 2014 and lawfully re-entered after presenting my advance parole document to an officer who stamped my passport and allowed me to enter the United States.

11. I understand that I am no longer able to apply for adjustment of status with USCIS because USCIS changed its policy in December 2019. The new USCIS policy means that my 2014 departure from the United States and subsequent re-entry on advance parole no longer has the effect of executing a removal order for TPS recipients like me. My understanding is that, as a result of this new policy, I still have an in absentia order in my immigration record, which means that I am not eligible to apply for adjustment of status with USCIS.

12. I understand that I could try to ask the Immigration Court in Houston, Texas to rescind the in absentia removal order from 1999 and reopen my immigration case. But I understand that process would be extremely time consuming and resource intensive, and that it would be very difficult to prevail, meaning I would still be unable to become a permanent resident even if I spent the time and money to pursue that process.

13. I also understand that I could try to obtain permanent residence by leaving the United States and applying for my immigrant visa in El Salvador. But I am afraid that if I have to go back to El Salvador I could get stuck there and might never be allowed to return to the United States. I need to be with my children and my husband who need me with them in Virginia. We

would be devastated if we had to be separated. We are a close and loving family that supports one another very much.

14. If the TPS program is ended, the U.S. government could remove me from the United States—my home for more than 20 years—and send me back to El Salvador, away from my U.S. citizen family.

15. My family and I are also very afraid that if I have to go back to El Salvador I will face persecution, physical violence, or the threat of violence given the volatile political situation there.

16. If not for the new policy USCIS adopted in December 2019, I would be able to adjust my status as I originally planned to do. If that policy were removed, I would file my application to adjust status and believe that I would be successful in doing so.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on: August 14, 2020

Burke, Virginia



Yolanda Maritza Ramirez