

# **EXHIBIT A**

**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 BLANCA MIRNA ROMERO DEL CID**

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 Blanca Mirna Romero del Cid. I currently live in Manassas, Virginia but I was born in El Salvador in 1975.

2. I first entered the United States in 1994 by crossing the U.S.-Mexico border in Arizona. I left El Salvador because I feared for my safety and to join my husband who had previously fled and sought asylum in the United States. My husband then added me to his asylum case.

3. In 1998, the Asylum Office referred me to the Immigration Court. The Immigration Judge granted me voluntary departure on October 15, 1998, but I did not leave the United States and have resided here continuously. I understand that I have a removal order since I did not leave the United States after I was granted voluntary departure.

4. On March 9, 2001, El Salvador was designated for the Temporary Protected Status (“TPS”) program. I applied for and received TPS shortly thereafter. I have held TPS continuously since then. I was also granted work authorization, which has permitted me to work legally in the United States and support my family for 18 years.

5. I have lived in Virginia since 1994. I have four U.S. citizen children: Joel, who is 23 years old, Wilfredo, who is 18 years old, Ruben, who is 4 years old, and Moises, who is 2 years old.

6. I have worked hard and been a contributing member of my community. I have never been arrested or convicted of any crimes and I consider myself to be a good person.

7. In 2013, I submitted Form I-131 (Application for Travel Document) to apply for an advance parole travel document, which U.S. Citizenship and Immigration Services (“USCIS”) approved. I then went back to El Salvador, returning to the United States and lawfully re-entering on July 12, 2013, after presenting my advance parole document to an officer who stamped my passport and allowed me to enter the United States.

8. On July 27, 2018, my oldest U.S. citizen son, Joel, filed a Form I-130 (Petition for Alien Relative) with 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. That petition was approved on January 15, 2020. At the same time that the I-130 was filed, I filed an application for adjustment of status (Form I-485) and an application for permission to reapply for admission into the United States after deportation or removal (Form I-212).

9. While my adjustment of status application was pending, in December of 2019, I understand that USCIS issued a new policy about people who have TPS and a prior removal order and travel abroad. On January 15, 2020, USCIS approved the Petition for Alien Relative

(I-130), but denied my adjustment of status application and administratively closed my Form I-212 because of the adjustment application denial. USCIS denied my adjustment application concluding that my departure from the United States in 2013 did not execute my removal order.

10. It is my understanding that I do not have a strong case for asking the Immigration Court to reopen my removal order and that if I tried, it would potentially take a long time and be expensive, but would be unlikely to result in the Immigration Court reopening my case to process my application for permanent residency.

11. It is also my understanding that if I tried to apply for permanent residence through the U.S. consulate in El Salvador I would have to remain outside of the United States for ten years, separated from my children, because of immigration penalties. I am also 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. This would be devastating for my children, especially 2-year-old Moises and 4-year-old Ruben, for whom I am the primary caretaker.

12. If the TPS program ends, I could be removed from the United States and sent back to El Salvador, away from my four U.S. citizen children.

13. My family and I are very afraid about what will happen to me if I have to go back because of the violence and poverty in El Salvador.

14. If the December 2019 policy change was eliminated and USCIS went back to its pre-December 2019 policy, I would still want to adjust status and would take all necessary steps to have USCIS reconsider my adjustment application, including re-filing my application if required.

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

Executed: August 14, 2020

Manassas, Virginia

A handwritten signature in black ink that reads "Blanca Romero". The signature is written in a cursive style and is underlined with a single horizontal line.

**Blanca Mirna Romero del Cid**

# **EXHIBIT D**

**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  
purported official capacity as Senior  
Official Performing the Duties of the  
Director of U.S. Citizenship and  
Immigration Services, *et al.*,

*Defendants.*

Case No.

**DECLARATION OF HEROLDINE BAZILE**

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 Heroldine Bazile. I was born in Haiti in 1997, but I have lived in the United States for practically all of my life, since I was eight months old. I currently live in Miami, Florida.

2. My mother fled Haiti with me in 1998 because she feared for our safety. My mother and I entered the United States on a boat. My mother filed an asylum application for us, but, on October 26, 1999, the Immigration Judge denied our asylum application and ordered us removed to Haiti. However, my mother and I stayed in the United States and, as a result, this is the only country I have ever known.

3. On January 21, 2010, when I was 12 years old, the U.S. government designated Haiti for Temporary Protected Status (“Temporary Protected Status”). Soon after, my father applied for TPS on my behalf. USCIS granted my TPS application and I

have had TPS since 2011. Since then, I have timely re-registered for TPS during the subsequent registration periods. Thanks to the TPS protection that USCIS has granted me for the past ten years, the U.S. government did not remove me from the United States even though I had a final order of removal.

4. Since I have been in the United States, I have lived with my U.S. citizen father, Eroid, and two younger U.S. citizen sisters Monica, who is 20 years old, and Eneida, who is 13 years old. I have done my best to contribute to society and abide by the law. I have never been arrested or convicted of any crimes. I believe I would be an excellent U.S. citizen one day if I can first obtain permanent residence.

5. During high school, I earned my Certified Nurse Assistant (“CNA”) certificate and worked as a CNA. I graduated high school in 2016 with an Advanced Placement program diploma.

6. In 2017, after high school, I became a Pharmaceutical Technician (“PT”). I have been working as a PT since 2017.

7. I am currently in college pursuing a bachelor of science in mortuary science. Due to my lack of lawful permanent residency I am ineligible for any type of federal student aid, but my father has sacrificed and worked hard to ensure that I am able to obtain an education despite not being able to access federal student aid.

8. I expect to obtain my college degree in May 2021. After graduating college, I hope to own a funeral home. I fear that if the U.S. government ends TPS before I have the opportunity to obtain permanent residence, I will no longer be able to pursue my bachelor’s degree or my professional goals.

9. In 2013, I applied for a travel document from U.S. Citizenship and Immigration Services (“USCIS”) using Form I-131 (Application for Travel Document) for a family trip to the Bahamas. USCIS approved it, and I traveled to the Bahamas. I re-entered the United States lawfully on December 24, 2013, presenting my advance parole document to an officer who reviewed my documents and allowed me to enter the United States.

10. On March 28, 2014, my U.S. citizen father filed a Petition for Alien Relative (Form I-130) with USCIS to prove that I am related to a U.S. citizen—*i.e.*, my father. I understand this was a necessary step for me to be eligible to apply for permanent residence.. At the same time, I applied to USCIS for adjustment of status to become a permanent resident (Form I-485).

11. On June 25, 2015, USCIS approved the Petition for Alien Relative (Form I-130) that my father had filed for me. USCIS never issued a decision on the adjustment of status application (Form I-485).

12. I filed a new application for adjustment of status (Form I-485) on September 29, 2017. On August 3, 2020, USCIS denied my adjustment of status application. USCIS’s decision says that USCIS does not have jurisdiction to process my adjustment of status application because I have a final and unexecuted order of removal. This means that, despite having left the United States and returning lawfully with an advance parole, USCIS believes that I continue to have an order of removal from the Immigration Judge. I later learned that this decision was part of a new USCIS policy about people who have TPS and a prior removal order and travel abroad that USCIS officially announced in December 2019.

13. I understand that I could ask the Immigration Court to reopen my removal order from 1999 so that, once my case is reopened, I can apply for permanent residency before the Immigration Court, but that it is unlikely to result in the Immigration Court reopening my case because there are very strict rules for seeking reopening of an order of removal. I also understand that the process to seek reopening would potentially take a long time and be expensive. I have been trying to obtain permanent residence since 2014 paying all of the associated costs along the way to no avail. I very am worried that the longer this process continues, the more likely the government will end TPS.

14. I also understand that I could try to obtain my permanent residence by leaving the United States and attending an interview for an immigrant visa at the U.S. Consulate in Haiti. I am afraid that if I have to go back to Haiti I could get stuck there and might never be allowed to return to the United States. My father and my younger sisters need me, and I need them as well. My family means everything to me, and I cannot envision my life without any of them. Plus, I would have to give up my professional goals.

15. If the U.S. government ends the TPS program for Haiti, the U.S. government could remove me from the United States and send me back to Haiti where I have not lived since I was a baby.

16. If not for the new policy USCIS adopted in December 2019, I would be able to adjust my status as I had originally planned to do. If not for the new policy, I could be a lawful permanent resident by now. If that policy were removed, I would take whatever steps are necessary, including re-filing my adjustment application if required, and believe that I would be successful in doing so.

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

Executed: 08/20/2020

Miami, Florida

  
\_\_\_\_\_  
Heroldine Bazile

# **EXHIBIT F**

**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 MARIA FLORISELDA ALVAREZ GOMEZ**

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 Maria Floriselda Alvarez Gomez. I live in Manassas Park, Virginia, but I was born in El Salvador in 1971.
2. I fled El Salvador in 1995 because I was afraid of being physically abused or extorted by the many gangs that dominate that country and its governmental institutions and because I wanted a better life for myself and my family. I entered the United States on April 10, 1995.
3. When I entered the United States, I was detained by the immigration authorities and placed into deportation proceedings. My deportation case was moved from Texas to Arlington, Virginia and on April 16, 1996, an Immigration Judge in Arlington granted me voluntary departure. I did not leave but instead remained in the United States. As a result, it is my understanding that I received an order of deportation.

4. On March 9, 2001, El Salvador was designated as a country covered by the Temporary Protected Status (“TPS”) program. Soon after I learned I was eligible for TPS, I applied for protection and for work authorization. I was granted TPS in 2001 and have held it to this day. TPS has allowed me to work legally in the United States and support my family.

5. I have extensive family ties to the United States and to the Commonwealth of Virginia, including through my four U.S. citizen children, who were all born in Virginia: Jennifer, my oldest, is 23 years old; Janeth and Jamileth, my twins, are 18 years old; and my youngest daughter, Kayly, is 10 years old. I have primarily raised my children on my own as a single mother, and have worked hard to support them and provide for them, especially my youngest daughter, Kayly, who has autism and needs to attend a special education school.

6. I consider myself to be a good and hard-working person, and a contributing member of society and of my community. I have always paid my taxes, and I have never been arrested or convicted of any crimes.

7. In 2018, I applied for a travel document from U.S. Citizenship and Immigration Services (“USCIS”) using Form I-131 (Application for Travel Document) so that I could take a trip back to El Salvador. USCIS approved my application, and I then traveled to El Salvador. I lawfully re-entered the United States on September 17, 2018, after presenting my advance parole document to an officer who stamped my passport and allowed me to enter the United States.

8. On March 18, 2019 my oldest daughter, Jennifer, filed Form I-130 (Petition for Alien Relative) with USCIS to demonstrate that I am related to a U.S. citizen—*i.e.*, my daughter. I understand this was a necessary step for me to be eligible to apply for permanent residence. USCIS approved the petition on June 4, 2020.

9. However, I understand that because of a new policy USCIS adopted in December 2019, I am not able to adjust status with USCIS even though I departed the United States and then lawfully re-entered using my advance parole document. Because of the new USCIS policy, USCIS perceives me as still having an order of deportation.

10. It is my understanding that I do not have a strong case for asking the Immigration Court to reopen my deportation order and that if I tried, it would potentially take a long time and be expensive, but would be unlikely to result in the Immigration Court reopening my case to process my application for permanent residence.

11. It is also my understanding that if I tried to apply for permanent residence through the U.S. consulate in El Salvador I would have to remain outside of the United States for ten years, separated from my children, because of immigration penalties. I am also 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. My children, especially my 10-year-old daughter Kayly, need me here in the United States.

12. If the TPS program is ended, the U.S. government could deport me from the United States immediately and send me back to El Salvador where I have not lived for 25 years.

13. I would be very worried about what will happen to my children if I have to go back to El Salvador, since they would go back with me because they have no one here to take care of them if I left. I would be very afraid for them because I come from a place full of violence and crime, and they have never even been in El Salvador. I would also be very worried about my own physical safety and well-being if I have to go back to El Salvador.

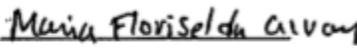
14. If not for the new policy USCIS adopted in December 2019, I would be able to adjust my status as I originally planned to do. If not for the new policy, I could be a lawful

permanent resident by now. 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 17, 2020

Manassas Park, Virginia

  
Maria Floriselda Alvarez Gomez

# **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

A handwritten signature in black ink that reads "Yolanda Maritza Ramirez". The signature is written in a cursive style with some capital letters.

Yolanda Maritza Ramirez