

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