

Declaration of "Jane Doe"

I, "Jane Doe", upon my personal knowledge, hereby declare as follows:

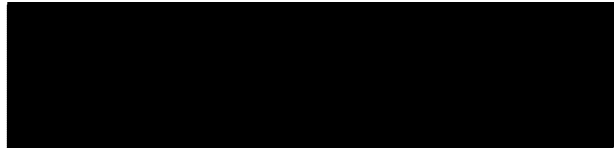
1. I am a United States citizen who was admitted to the United States as an LPR in 2014 and who naturalized in 2018.
2. I currently live in Rancho Cucamonga, California with my two children [REDACTED] [REDACTED]. I work as a packager at a nail plate company and my hours can run long. Having my parents here would be of great help with the care of my kids. Currently, in the United States I have my brothers and sisters here. Life in the United States has not been easy and I have had many obstacles along the road. I have been in this country for 13 years and I have seen the beauty and opportunities this country has for people. As a victim of abuse, I am thankful to this country for giving me the chance to get up on my two feet and continue with my life after that dark time. The United States has given me a sense of hope and happiness for the future and although I am not where I would like to be, I am getting there.
3. I currently have Medical subsidized health insurance since my employer does not offer health insurance. It has been hard, financially as a single mother to be able to afford a private health insurance.
4. I have sponsored an immigrant visa application for my parents, so that I can reunite with them here.
5. My parents are [REDACTED] and currently reside in Nicaragua. They are nationals of Nicaragua.
6. I applied for my parents to come to the United States on or around December 19, 2018. The I-130 petitions were approved on or around July 09, 2019.
7. Since then, my parents have received the NVC letter to proceed with the Consular Process and we are currently working on the collection of information and documents to submit the DS-260 and immigrant documents.
8. They were awaiting the interview when they received news of the October 4 Presidential Proclamation detailing the ban on their entry unless they will be covered by approved health insurance within 30 days of the alien's entry into the

United States, or unless the alien possesses the financial resources to pay for reasonably foreseeable medical costs.

9. Currently my parents do not have health insurance. They go to local clinics in Nicaragua when they need medical assistance. After being victim of abuse and being a single mother, it has been financially hard for me. So far, I have attempted to search for health insurance for my parents abroad that suits their situation and that it is affordable, but I have not been successful. Therefore, my parents would be affected by the Proclamation.
10. I have already been living apart from my parents for 13 years, and the separation has been exceptionally painful. I can only communicate with my parents twice a week, if that, since they live in a remote location. The separation has been extremely hard. To be away for many years from my parents made me feel alone in this country. To have gone through the domestic violence and not have my mother and father here to run to and ask for help and to have endure so many horrible moments has been extremely painful. And the fact that they have also not been here for the beautiful moments – like the birth of my children – breaks my heart. Not only has a daughter been separated from her parents, but grandkids have not had the opportunity to meet their grandparents.
11. I understand that under the new Proclamation I am indefinitely unable to reunite with my parents. When I learned that our separation will be prolonged indefinitely, I felt saddened. To have gone through so many awful moments and then finally have hope that we would finally reunite with your parents is a feeling that cannot be explained. All those hopes were crushed by the uncertainty of how much longer it would take with the Proclamation.
12. My family is from Latin America. I believe that the purpose of the Proclamation is meant to prevent people like me and my family from emigrating to the United States and reuniting with family. The President's statements and views behind the immigration restrictions make me feel targeted for my national origin and has caused me and my family considerable anxiety and stress. I was appalled with this because it meant another barrier that we had to overcome just so that I could reunite with my parents.

13. I am fearful that my participation in this lawsuit against United States federal government officials could jeopardize the visa petition for my family. I do not want my participation in the lawsuit to adversely impact the petition and delay or prevent my parents from coming to the United States.
14. I fear that whether or not my parents' visa petition is delayed or denied, my participation in the lawsuit using my real name would subject my family to harassment/violence/discrimination in the United States. For standing up for the injustices that is being done here, we become vulnerable to actions from people that agree with this Proclamation and we want to protect ourselves from that.
15. For these reasons, I feel that my personal security and that of my family necessitates that I be allowed to proceed under a pseudonym.
16. I am willing to serve as a class representative on behalf of those who are similarly situated to me and cannot have family members join them in the United States because of the current refugee restrictions.
17. I know that if the class is certified I will be representing more than just myself in this case. I have spoken with the lawyers who represent me about what being a class representative means. I want to help everyone in my situation because we are all suffering due to the unfair restrictions on refugee admissions imposed by this Administration.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at Encino, CA on October 28, 2019.



“Jane Doe”