

EXHIBIT A

Declaration of Jane Doe

DECLARATION OF JANE DOE

I, [REDACTED], hereby declare under the penalty of perjury under the laws of the United States of America:

1. I make this declaration based on my personal knowledge, except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am a lawful permanent resident of the United States and a citizen of Mexico. I am 68 years old. I am a widow, and I have 5 children and 17 grandchildren.
3. I have not been convicted of a crime anywhere in the world.
4. I currently live in Garnavillo, Iowa. Two of my adult daughters live in the same town, and I usually split my time living between their homes.
5. I was married to a U.S. citizen for more than 40 years. Sadly, my husband passed away several years ago.
6. Four of my children live here in the United States and one lives in Mexico.
7. My husband and I met in Mexico when we were young. We got married and started our family. My husband later came to the United States in the 1980s to find work. He would regularly travel back to Mexico to visit the children and me and then return to the United States to work.

8. My husband became a U.S. lawful permanent resident in the 1980s and eventually a U.S. citizen.
9. The children and I came to the United States to reunite with my husband in 2000.
10. In 2005, I returned to Mexico when my mother passed away. I stayed there for a few months, and when I tried to re-enter the United States to reunite with my husband and children, I was stopped by immigration officials at the border, detained for about half a day, and then sent back to Mexico. I was issued a removal order.
11. After being removed to Mexico, I was separated from my family for many years. It felt terrible to be apart from them. I was not able to see my children during this time. Only my husband was able to visit me in Mexico occasionally.
12. Because my husband had U.S. citizenship, he was able to file a petition for me to return to the United States. It took a long time for it to be approved, and sadly, my husband passed away before I was able to actually come back.
13. After my husband passed away the application converted to a widow petition.

14. As part of the process to get my green card, I had to ask that my prior removal order be waived, so that I could lawfully reenter the United States. That waiver was approved in May 2020.
15. Finally, in 2022, my application for residency was approved, and I was able to return to the United States as a lawful permanent resident.
16. Two of my daughters had settled in Iowa for work, so I came to join them in Garnavillo. After so much time apart, I am grateful to be near them and to be able to spend time with my 17 grandchildren who also live in Iowa.
17. I learned about S.F. 2340 from my daughters. I am terrified that I could be prosecuted under the law and removed to Mexico. After my removal order in 2005, I waited patiently for the government to approve my visa. It was devastating to be separated from my husband, children, and grandchildren for so many years. I cannot imagine having to go through that again, especially now when I have my green card. I would be heartbroken; it would change my entire life.
18. I suffer from diabetes and hypertension. Since being in the United States, my health has been more stable. I rely on my daughters and grandchildren around to watch over me and make sure I get the medical

care that I need. If something happened to me, I know they would make sure to call for help and get me to a doctor.

19. Because of my health issues, it's important for me to avoid strong emotions or sudden shocks. I can get very sick when my blood sugar gets too high or too low or if I experience a lot of stress. Even though the new law is not in effect yet, I already feel a lot of fear that I will be prosecuted, put in jail, and even separated from my family. I worry that my health will suffer because of the anxiety and stress.

20. For these reasons, I do not want my name to become public with this lawsuit. I am already under a great amount of stress, and I fear that making my name public, and the possibility of prosecution, will only make the anxiety and stress worse. I am in great fear of being deported to Mexico, where I have nothing and wouldn't have the support of my family. After being separated from my family for nearly twenty years, I'm afraid that if my name becomes public, I will be separated from them yet again.

21. I also fear that people might threaten or harass me if my name becomes public. I never know how people are going to treat me, and whether they have bad feelings towards immigrants. If my name becomes public, I would be even more worried about harassment and mistreatment.

22. I hope S.F. 2340 is declared unlawful because if the law goes into effect, it will cause severe harm to me and other immigrants like me in Iowa.

My entire life is in Iowa now. I can't imagine being separated from my children and grandchildren once again. I do not understand how the state of Iowa could deport me or other people like me who have a green card.

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

Executed on May 7, 2024 at Garnavillo, Iowa.

[REDACTED]

JANE DOE

DECLARATION OF JANE DOE

I, [REDACTED], am the individual referred to as Jane Doe in the attached declaration.

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

Executed on May 7, 2024 at Garnavillo, Iowa.

[REDACTED]

Jane Doe

CERTIFICATION

I, Shefali Aurora, declare that I am fluent in the English and Spanish languages.

On May 5, 2024, I read the foregoing declaration and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I finished translating the declaration, the declarant verified to me that the contents of the foregoing declaration are true and accurate.

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

Executed on May 10, 2024 at Des Moines, Iowa.



Shefali Aurora

05/10/2024

Date