

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

CASA, INC. *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP *et al.*,

*Defendants.*

Case No.: \_\_\_\_\_

**DECLARATION OF MONICA**

I, Monica, submit this declaration pursuant to 28 U.S.C. § 1746 and declare under penalties of perjury as follows:

1. I am a member of the Asylum Seeker Advocacy Project (“ASAP”) and I joined the organization voluntarily.
2. I am currently living in South Carolina.
3. I am pregnant and due in August of 2025.
4. My partner and I are both originally from Venezuela, and we both have Temporary Protected Status (TPS) as well as a pending affirmative asylum application with USCIS.
5. We have been in the United States since 2019.
6. I am a trained medical doctor who is seeking to validate my medical degree in the United States.

7. I am worried that it would be next to impossible to get my child Venezuelan citizenship even if I tried. There is no Venezuelan Consulate in the United States where I could even apply for Venezuelan citizenship for my baby, and we would have to travel outside of the U.S. in order to obtain a Venezuelan passport for our child. Since we are asylum seekers, we are not able to travel outside of the U.S.

8. Because I do not believe my child will be able to receive Venezuelan citizenship, both my partner and I want to get our child a U.S. passport and proof of U.S. citizenship as soon as possible, but now we are worried our child will not be able to receive U.S. citizenship either.

9. If that happens, we are very concerned that our child will not be a citizen of any country and will be stateless.

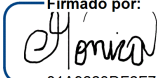
10. We are afraid that the government will retaliate against us if our full names are publicly disclosed in this lawsuit because we are suing the government directly. We have pending asylum applications and do not want this lawsuit to affect the decision in our asylum claims.

11. We also want to protect the privacy of our baby who has not been born yet. We don't want information about them to be made public before they are even born, and want to make sure we as the parents are protecting their privacy throughout this entire process.

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

Dated: January 21, 2025

Respectfully submitted,

Firmado por:  
  
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Monica