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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA
VIVAS CASTILLO,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-1766

**DECLARATION OF JOSE A. PALMA
JIMENEZ IN SUPPORT OF
PLAINTIFFS' MOTION TO POSTPONE
EFFECTIVE DATE OF AGENCY
ACTION**

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DECLARATION OF JOSE A. PALMA JIMENEZ

I, José A. Palma Jimenez, declare:

1. I am Co-Coordinator of the National TPS Alliance (NTPSA). I have worked with the NTPSA in various roles since it was founded in 2017. I served as Co-Coordinator in 2019 and again from June 2023 through the present.

2. As Co-Coordinator, I oversee NTPSA's daily work, including its organizing and advocacy efforts, leadership development, and member relations. I have detailed knowledge about NTPSA's membership, including membership demographics, member needs and priorities, and the role members play in setting NTPSA's mission and advocacy.

3. I make this declaration based on my personal knowledge; files and documents of NTPSA that I have reviewed; and information provided to me by NTPSA leaders who I believe to be reliable, including NTPSA organizers, members of the NTPSA Executive Committee, local Committee Coordinators, and other NTPSA-affiliated staff. These files, documents and information are the type that is generated in the ordinary course of business and that I would customarily rely on in conducting NTPSA business.

Background on NTPSA

4. NTPSA is a member-led organization whose mission is to defend the Temporary Protected Status (TPS) program and win a path to permanent residency for TPS holders.

5. NTPSA is a project of, and is fiscally sponsored by, the Central American Resource Center – CARECEN – of California (“CARECEN”), a non-profit organization that has worked for more than four decades to provide immigrant integration programs, deliver immigration legal services, and foster civic participation and community engagement on immigration policy, education reform and workers' rights. CARECEN is incorporated and has its primary address in Los Angeles.

6. The NTPSA is also supported by the National Day Laborer Organizing Network (NDLON), a non-profit organization that improves the lives of day laborers,

1 migrants, and low-wage workers by building leadership and power among those facing
2 injustice so they can challenge inequality and expand labor, civil, and political rights for
3 all. NDLON provides staffing, mentorship, and other support for the NTPSA. For
4 example, I am employed by NDLON to serve as Co-Coordinator of the NTPSA.

5 7. Current and former TPS holders, as well as family and other supporters of
6 TPS holders, can become NTPSA members by either joining a local NTPSA committee or
7 submitting an individual membership application. After review and approval, NTPSA
8 notifies individuals whose applications have been accepted. Individuals who are interested
9 in starting a new local NTPSA Committee may do so by sending a letter to the Executive
10 Committee for review and approval.

11 8. Membership in NTPSA is voluntary and free.

12 9. NTPSA has TPS holder members from Afghanistan, Burma (Myanmar),
13 Cameroon, El Salvador, Haiti, Honduras, Lebanon, Nepal, Nicaragua, Sudan, Ukraine,
14 Venezuela, and Yemen.

15 10. NTPSA prioritizes the leadership of TPS holders within our organization and
16 within broader efforts to defend TPS. A slogan we often use is, “Nothing about us without
17 us.” We believe that TPS holders need to be at the table for decisions that affect our lives
18 as TPS-holders.

19 11. I myself am a TPS holder from El Salvador. As a TPS holder, I am able to
20 understand and connect with NTPSA’s TPS holder members at a deeply personal level.

21 12. There are currently 25 local NTPSA committees active in 14 states:
22 Arkansas, California, Florida, Georgia, Illinois, Iowa, Louisiana, Massachusetts, Nebraska,
23 Nevada, New Jersey, New York, North Carolina, Texas, Virginia. Approximately 80
24 percent of NTPSA’s local committee members are TPS holders.

25 13. In addition, NTPSA has over 84,000 Venezuelan TPS holder members living
26 in all 50 states and the District of Columbia.

27 14. The NTPSA was founded in June 2017 at a meeting in Washington D.C.
28 called by NDLON and CARECEN to respond to the imminent termination of TPS for

1 Haiti, that had been announced in May of that year.

2 15. Several hundred people, including myself, attended the June 2017 meeting.
3 At the meeting, attendees—the vast majority of whom were TPS holders—made the
4 decision to form the National TPS Alliance.

5 16. Today, the NTPSA is led by an Executive Committee, members of which are
6 selected every two years by NTPSA members. The majority of Executive Committee
7 members are TPS holders. The Executive Committee meets regularly throughout the year
8 and makes decisions by majority vote.

9 17. The NTPSA also maintains working groups on specific subjects, like
10 leadership development and communications. NTPSA members may volunteer to
11 participate in working groups. Working groups meet regularly throughout the year.

12 18. In addition, the NTPSA generally holds two in-person gatherings a year: a
13 Leaders Assembly, where member leaders participate and elect members of the Executive
14 Committee; and a Coordinators' Meeting, where local committee coordinators meet to
15 strategize.

16 19. NTPSA operates under a democratic model. Local committees and working
17 groups develop work plans and proposals and send them to the Executive Committee for
18 review and approval via majority vote.

19 20. When individual members join the NTPSA, they are invited to make
20 suggestions about what they would change about the TPS program. The NTPSA reviews
21 those answers to help determine what projects, campaigns, and other work to take on.
22 NTPSA also continuously gathers feedback from individual members to further shape
23 NTPSA's work.

24 21. The NTPSA engages in advocacy to defend TPS and win a path to
25 permanent status for TPS holders; organizes actions to raise public awareness about TPS
26 and the contributions TPS holders make to this country; facilitates community and civic
27 engagement by TPS holders; and provides access to timely and accurate TPS-related
28 information and services to its members.

1 22. For example, in 2018, the NTPSA organized a “Journey for Justice” in which
2 approximately 50 TPS holders, their families, and other civil rights leaders embarked on a
3 journey by bus across the United States to oppose the TPS terminations for El Salvador,
4 Haiti, Honduras, Nepal, Nicaragua and Sudan that were announced in 2017 and 2018. The
5 bus was welcomed by faith and community groups in towns and cities across the country,
6 where riders met with the local community to build support for TPS holders. In 2021,
7 NTPSA organized a similar Journey for Justice, which emphasized both the continuing
8 threat to TPS and the role many TPS holders played in supporting the country through the
9 pandemic as food and healthcare workers. I personally participated in both journeys.

10 23. The NTPSA has also organized numerous marches, hunger strikes, and
11 teach-ins to defend TPS and call for a path to permanent residency for TPS holders. For
12 example, in 2021, members of the NTPSA held a 43-day rolling hunger strike in Liberty
13 Plaza in Washington, D.C. to call for permanent residency for TPS holders. Throughout
14 the hunger strike, the NTPSA held weekly press conferences, conducted teach-ins, hosted
15 live musical performances, and handed out educational materials.

16 24. The NTPSA has also kept the TPS community informed about developments
17 in the TPS program via meetings and webinars; social media postings; and a weekly radio
18 show called Radio Alianza TPS.

19 25. The NTPSA played a key role in explaining the developments in the *Ramos*
20 *v. Mayorkas* and *Bhattarai v. Mayorkas* litigation, which challenged the 2017 and 2018
21 terminations of TPS for El Salvador, Haiti, Nicaragua, and Sudan (in *Ramos*) and for
22 Honduras and Nepal (in *Bhattarai*), to its members. Throughout the six-year litigation, the
23 NTPSA kept members informed about developments via meetings, conference calls, and
24 written advisories. It also coordinated rallies and press conferences at key hearings,
25 including outside the oral arguments that took place at the Ninth Circuit and *en banc* Ninth
26 Circuit hearings.

27 26. Since Venezuela was first designated for TPS in 2021, the NTPSA has
28 worked closely with its Venezuelan TPS holder members and the Venezuelan TPS holder

1 community. For example, in 2023 and 2024, NTPSA coordinated approximately 7-10 legal
2 clinics in Baltimore, Boston, California, Georgia, and Houston at which it assisted
3 Venezuelans to register for or renew their TPS.

4 27. Following DHS's decision to vacate the January 2025 Extension of
5 Venezuela's TPS designation, and terminate Venezuela's 2023 designation, the NTPSA
6 has worked to provide timely, accurate information to Venezuelan TPS holders about the
7 status of Venezuela's designation and to organize a response, including through a virtual
8 community meeting attended by over 1,000 TPS holders that the NTPSA organized just
9 days after the termination order.

10 **The Vacatur of Venezuela's TPS Extension and the Subsequent Termination of**
11 **Venezuela's TPS Designation Harm NTPSA's Members**

12 28. NTPSA's Venezuelan TPS holder members face serious harm from the
13 vacatur of the January 17, 2025 TPS extension and the subsequent decision to terminate
14 Venezuela's 2023 TPS designation.

15 29. NTPSA's Venezuelan TPS holder members who initially registered under
16 Venezuela's 2023 designation will lose their work authorization on April 3, 2025 and face
17 the prospect of deportation beginning April 7, 2025.

18 30. NTPSA's Venezuelan TPS holder members who initially registered under
19 Venezuela's 2021 designation have seen their period of work authorization and lawful
20 status cut short by 13 months, from October 2, 2026 to September 10, 2025.

21 31. The vacatur and termination decisions have caused tremendous stress and
22 anxiety for our Venezuelan TPS holder members.

23 32. Members have called me feeling palpably anxious and desperate, because
24 they do not know what to do. One member began to cry when he told me about his 80-
25 year-old mother, a Venezuelan TPS holder who has been so scared since the termination
26 announcement that she will not leave the house.

27 33. Many of our members are beginning to make plans for selling their homes
28 and cars, ending their leases, and collecting their belongings in preparation to leave the

1 country. But they do not believe they can safely return to Venezuela because there is no
2 security and the economy is in total collapse. If the United States will not allow them to
3 stay, they do not know where they will go. This problem is even more difficult because
4 many do not have valid passports and are unable to travel.

5 34. Several of the Individual Plaintiffs in this lawsuit are members of the
6 NTPSA. To further illustrate the harms that Venezuelan NTPSA members face as a result
7 of the actions challenged in this lawsuit, I share below the stories of some of the other
8 individual NTPSA members whom I and other NTPSA-affiliated staff have tried to
9 support during this difficult time:

10 35. **C.H.**, a NTPSA member in Brooklyn, New York, is a beneficiary of the
11 2021 Venezuela designation of TPS. She is expecting to lose her TPS in September 2025.
12 She is 42 years old and has lived in the United States since 2019. C.H. applied for asylum
13 soon after she arrived in the United States, but her application has not been processed. An
14 engineer by profession, C.H. has worked for the past four years as a contractor with a
15 prominent electrical company.

16 36. C.H. has been living in fear since the termination of TPS for Venezuela. She
17 fears that she will lose her legal status and right to remain in the United States; and she
18 cannot safely return to Venezuela due to fear of lack of civil rights, getting jailed, tortured
19 or worse. She has no valid passport and so could not legally travel internationally even if
20 she wanted to leave, because of the lack of a Venezuelan consular office in the United
21 States. While she has a pending asylum application, she is aware that this does not provide
22 her legal status and the right to remain, and that her asylum petition could be denied at any
23 time. She would then have no work authorization, and without that, no ability to pay for
24 her rent, health benefits, and other basic needs, or to provide support to elderly and ailing
25 relatives in Venezuela. C.H. is concerned about the high-level targeting of Venezuelans in
26 particular. She thinks the classification by the president of all Venezuelans as criminals
27 means that people look at her differently and that she will face increasing discrimination.
28 She cancelled recent long-distance travel, and tries to limit her time out of the house, as a

1 result of heightened fears that she will be targeted as a Venezuelan immigrant. She has not
2 slept well, and has suffered ongoing flashbacks to her life in Venezuela—specifically, the
3 destruction of institutions overnight and targeting of vulnerable individuals.

4 37. **A.N.** lives in Kansas and is a beneficiary of the 2023 Venezuela designation.
5 She is 24 years old and has lived in the United States since 2022. Her parents and
6 boyfriend also have TPS under Venezuela’s designation and live in Kansas. A.N. applied
7 for asylum soon after she arrived in the United States, but has not had an interview, or seen
8 any movement on her application. She currently works in the insurance industry, helping
9 elderly people identify their insurance options. A.N. is afraid of losing her TPS because it
10 is all that she is relying on for her legal status. While she has a pending asylum application,
11 which allows her to have work authorization at least so long as her asylum application is
12 not denied, this does not protect her from deportation or immigration detention as her TPS
13 does. As a result, she has felt tremendous fear and vulnerability since the decision by DHS
14 Secretary Noem to terminate TPS for Venezuela. She and her boyfriend have discussed
15 whether they need to leave the country, and they do not know where they could go. They
16 do not feel that they could safely return to Venezuela because they fear being persecuted.

17 38. **A.N.** has also felt the painful stigma of President Trump and Secretary
18 Noem’s statements labeling all Venezuelans in the United States as criminals. She feels
19 she is between a rock and a hard place—on the one side, she would be persecuted in
20 Venezuela, in part because of her time in the United States, and on the other side, the
21 United States is falsely categorizing her and all Venezuelans as criminals tied to the Tren
22 de Aragua gang, solely by virtue of her nationality. Restoring TPS for Venezuela would
23 alleviate some of the stigma A.N. has felt in connection with the termination of the
24 designation and the President and Secretary’s statements about Venezuela.

25 39. **C.D.**, a 60-year old father of three, holds TPS under Venezuela’s 2021
26 designation. He lives in Houston, Texas, where he and his wife own their own home. They
27 have consistently paid their taxes. C.D. works for a temporary staffing agency and was
28 recently diagnosed with prostate cancer. If he loses his TPS in September 2025 he would

1 lose his job and be unable to pay for his mortgage and health care, which would be
2 economically devastating for him and his wife. Losing TPS would also expose C.D. to
3 risk of being deported from the United States, which would inflict many harms, including
4 preventing him from accessing the medical care he needs to treat his cancer.

5 40. **L.G.** holds TPS under Venezuela's 2023 designation. She lives in Houston,
6 Texas with her husband. In Venezuela, L.G. worked as a journalist and, before that, with a
7 professional theatre company. She and her husband came to the U.S. under the CNHV
8 parole program, under sponsorship from her husband's employer. They are now preparing
9 to sell their belongings and return to Venezuela, but they may not be able to afford basic
10 food and medicine if forced to return to Venezuela.

11 41. **A.G.** lives in South Carolina and has a pending application for TPS under
12 Venezuela's 2023 designation. Under the January 2025 extension, approval of her
13 application would have resulted in TPS and work authorization through October 2026. In
14 Venezuela, A.G. received her degree in engineering and worked in business. A.G. first
15 arrived in the United States in 2021. She fears persecution if she were forced to return to
16 Venezuela, but never filed an asylum application because she believed her partner, a U.S.
17 citizen, would sponsor her for a visa. However, she and her partner have now separated
18 and A.G. is completely dependent on TPS for her lawful status and her work permit. She
19 does not know what she will do if she loses her TPS in April.

20 42. If this lawsuit were successful in setting aside the vacatur of the January 17,
21 2025 TPS extension and the subsequent decision to terminate Venezuela's 2023 TPS
22 designation, it would further the interests of the NTPSA's members.

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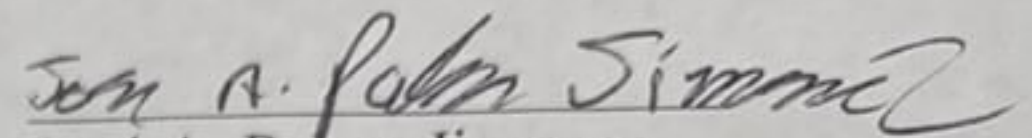
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1 I declare under penalty of perjury that the foregoing is true and correct, and that this
2 declaration was executed at Los Angeles, California this 19th day of February, 2025.

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5 José A. Palma Jimenez
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