

EXHIBIT B

Declaration of Elizabeth Roe

DECLARATION OF ELIZABETH ROE

I, **Elizabeth Roe**, 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 Colombia. I am 40 years old. I am married to a United States citizen.
3. I have not been convicted of a crime anywhere in the world.
4. I live in Des Moines with my husband.
5. I met my husband in October 2016 in Des Moines, and we got married in 2018 in Colombia.
6. I came to the United States for the first time in September 2016. I have two brothers who are U.S. citizens and I came to reunite with them.
7. Immigration detained me at the border for 24 hours. They gave me an expedited removal order and then they gave me parole and let me proceed to Iowa with the requirement of reporting to the immigration office every month.
8. In February 2017, I was deported because I missed a reporting date as I had written down the incorrect date.

9. I was in immigration detention for several weeks and then I was removed to Colombia at the end of February 2017.
10. While I was in Colombia my now-husband would come to visit me. We got married there on April 24, 2018. After that, my husband filed a petition on my behalf, so that I could get my green card and return to live with him in the United States.
11. As part of the green card application process, I had to ask that my prior removal order be waived, so that I could lawfully reenter the United States.
12. I waited out the time for the waiver to be approved in Colombia. I was there for nearly six years. During this time my husband would come to visit me, but it was a difficult period because we could not be together all the time. Thankfully since my brothers were already U.S. citizens, they were also able to visit occasionally, but it was hard to be away from them all for so many years with only these short visits.
13. Once my waiver was approved, I returned to the United States as a lawful permanent resident in May 2023 to reunite and live with my husband.
14. Our life is here in Iowa, and I am glad to be finally reunited and living with my husband after so many years apart waiting for the application to be approved.

15. I work at Amazon and always try to do my job well. My husband works in a landscaping company. We are hardworking people and are just trying to improve our lives. We go to church regularly when our work schedule allows. We are close with my brothers and their families, we all go to church together often. We live nearby and spend a lot of time together as a family.

16. I would not like my name to be public because I am afraid of the consequences of my name coming out as part of this case. I am scared others may harass me or do something worse if my name is publicized.

17. I hope the courts stop this law because it is very harmful to immigrants like me in Iowa. I am finally reunited with my husband after many years apart waiting to come through a legal immigration pathway. I am here with legal status as a permanent resident, and I am working hard and not causing any trouble, I hope the State of Iowa does not deport people in circumstances like mine.

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 8, 2024 at Des Moines, Iowa.



ELIZABETH ROE 

DECLARATION OF ELIZABETH ROE

I, [REDACTED], am the individual referred to as Elizabeth Roe 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 8, 2024 at Des Moines, Iowa.

[REDACTED]

ELIZABETH ROE

CERTIFICATION

I, Tracey Ramirez, declare that I am fluent in the English and Spanish languages.

On May 8, 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 8, 2024 at Des Moines, Iowa.

Interpreter signature:

Tracey Ramirez

Date:

05/08/2024