

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CATHOLIC LEGAL IMMIGRATION NETWORK, INC. (CLINIC), AFRICAN COMMUNITIES TOGETHER, AGNES KYEREMAA, PATRICIA RICHARDSON, CESAR ANDRED AGUIRRE, ALICE BRIGGS, MARU MAHMUD HASSEN, MUNTHAZ MAHMUD HASSEN, ADRIAN MITCHELL, JUAN DAVID BUITRAGO CAGUA, ALEJANDRA ALCENDRA MOSCOTE, ANDRES ALFONSO MEDINA RAMIREZ, FERNANDO LIZCANDO LOZADA and LINA MARGARITA ANGULO PEÑARANDA

Plaintiffs,

- against -

MARCO RUBIO in his official capacity as Secretary of State; and the UNITED STATES DEPARTMENT OF STATE,

Defendants.

Case No. 1:26-cv-00858 (JAV)

DECLARATION OF JOANNA ELISE CUEVAS INGRAM IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

DECLARATION OF JOANNA ELISE CUEVAS INGRAM

I, JOANNA ELISE CUEVAS INGRAM, declare under penalty of perjury, the following:

1. I am a Senior Staff Attorney with the National Immigration Law Center ("NILC") and have served as Lead Counsel and Counsel of Record for Plaintiffs in this litigation.
2. NILC, along with Democracy Forward Foundation, The Legal Aid Society, the Western Center on Law & Poverty, the Center for Constitutional Rights, and Colombo & Hurd (together, "Plaintiffs' Counsel"), represent the Plaintiffs in the above-captioned action.
3. I respectfully submit this declaration in support of Plaintiffs' Motion for Partial

Summary Judgment.

4. I am familiar with the documents and Exhibits attached hereto, including Exhibits A-E, which are true and correct copies of Exhibits filed with or incorporated into Plaintiffs' Complaint (ECF Dkt. 1 & 12), originally filed on February 2, 2026.

5. Exhibits A–E are identified expressly in the Complaint. Exhibits F–H are additional materials relied upon in connection with Plaintiffs' Complaint and Motion for Partial Summary Judgment.

6. Attached as Exhibit A, also available at ECF Dkt. 1-1 and 12-1, is a true and correct copy of *Immigrant Visa Processing Updates for Nationalities at High Risk of Public Benefits Usage*, U.S. Department of State (Jan. 14, 2026) (Referenced in Complaint as Exhibit A: the “Blanket Visa Ban”).

7. Attached as Exhibit B, is a true and correct copy of “*Pausing Immigrant Visa Issuances for Nationalities at High Risk of Public Charge*,” U.S. Dep’t of State Visa Cable, 26 STATE 3740 (Jan. 14, 2026).

8. Attached is a true and correct copy of Exhibit C, also available at ECF Dkt. 1-3 and 12-3, “*Consular Processing Cable*,” U.S. Department of State (Nov. 6, 2025) (*Referenced in Complaint as Exhibit C*). Upon information and belief, the unofficial version attached as Exhibit C is an accurate copy of the Consular Processing Cable, as it corresponds to the details regarding the cable reported by the Associated Press and other news outlets. *See, e.g.*, Amanda Seitz, *Immigrants With Health Conditions May Be Denied Visas Under New Trump Administration Guidance* (Nov. 6, 2025), <https://kffhealthnews.org/news/article/visa-public-charge-health-conditions-trump-state-department/>.

9. Attached as Exhibit D, also available at ECF Dkt. 1-4 and 12-4, is a true and correct copy of the Jan. 27, 2026, Ltr. from Members of Congress to Secretary Rubio and Secretary Noem.

10. Attached as Exhibit E, also available at ECF Dkt. 1-5 and 12-5, is a true and correct copy of , *Sangster v. Rubio*, Case No. 3:25-cv-00447-ART-CSD (D. Nev. Aug. 22, 2025), ECF No. 21, Order Granting Pls.’ Motion for a Temporary Restraining Order (Jan. 28, 2026).

11. Attached Exhibit F is a true and correct copy of *Immigrant Visa Processing Updates for Nationalities at High Risk of Public Benefits Usage*, U.S. Department of State (Jan. 14, 2026; Last Updated, Feb. 2, 2026), *available at* <https://travel.state.gov/content/travel/en/News/visas-news/immigrant-visa-processing-updates-for-nationalities-at-high-risk-of-public-benefits-usage.html> (last visited March 10, 2026) (*an updated version of the document referenced in Complaint as Exhibit A, and available at ECF Dkt. 1-1 and 12-1: the “Blanket Visa Ban”*).

12. Attached as Exhibit G is a true and correct copy of the official unredacted version of “*Pausing Immigrant Visa Issuances for Nationalities at High Risk of Public Charge*,” U.S. Dep’t of State Visa Cable, 26 STATE 3740 (Jan. 14, 2026), released to Plaintiffs by Defendants upon Plaintiffs’ request on March 6, 2026 in accordance with the Plaintiffs’ Consent Motion filed with the Court on March 4, 2026 (ECF Dkt. 44 at 2) (*referenced in Complaint as Exhibit B, and available at ECF Dkt. 1-2 and 12-2: the “Blanket Visa Ban Cable”*).

13. Attached as Exhibit H is a true and correct copy of “*Preventing Public Benefits Reliance*,” U.S. Department of State (Last Updated Feb. 26, 2026) *available at* <https://travel.state.gov/content/travel/en/News/visas-news/preventing-public-benefits->

[reliance.html](#) (last visited March 10, 2026).

14. Attached as Exhibit I is a true and correct copy of the U.S. Citizenship and Immigration Services (“USCIS”) Policy Manual, Vol. 6, Part B, Chapter 3, *available at* <https://www.uscis.gov/policy-manual/volume-6-part-b-chapter-3> (last visited March 10, 2026).

15. Attached as Exhibit J is a true and correct copy of the U.S. Citizenship and Immigration Services (“USCIS”) Policy Manual, Vol. 6, Part B, Chapter 5, *available at* <https://www.uscis.gov/policy-manual/volume-6-part-b-chapter-5> (last visited March 10, 2026).

16. Attached as Exhibit K is a true and correct copy an excerpt of Chapter 14.4 of the U.S. Customs and Border Protection Inspector’s Field Manual (Posted January 23, 2012), *available at* https://www.governmentattic.org/5docs/CPB-IFM_2006.pdf (last visited March 10, 2026).

17. Attached as Exhibit L is a true and correct copy of the USCIS Immigrant Fee Overview posted on the official USCIS website, *available at* <https://my.uscis.gov/accounts/uscis-immigrant-fee/start/overview> (last visited, March 10, 2026).

18. Attached are true and correct copies of Plaintiffs’ Declarations in Support of Plaintiffs’ Motion for Partial Summary Judgment, attesting to material facts relevant to the instant motion. Plaintiffs reserve the right to submit supplemental declarations attesting to material facts relevant to other claims currently held in abeyance if, and at such time, any motions on such claims are submitted to the Court.

19. Attached is a true and correct copy of Plaintiffs’ Fed. R. Civ. Proc. 56.1 Statement of Facts listing undisputed material facts relevant to the instant motion.

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

Dated:

March 10, 2026
New York City, New York

/s/ Joanna Elise Cuevas Ingram
JOANNA ELISE CUEVAS INGRAM

I, Erez Reuveni, hereby certify that on March 10, 2026, I filed the foregoing Document and all referenced attachment with the Clerk of the Court for the United States District Court for the Southern District Court of New York using the CM/ECF system. Notice of this filing is being sent by operation of the Court's electronic filing system to all counsel of record who are registered CM/ECF users. I have also emailed counsel of record for Defendants, who have not entered an appearance.

/s/ Erez Reuveni
Erez Reuveni