EXHIBIT A
DECLARATION OF RHINA MARTINEZ

1. My name is Rhina Martinez. I live at 7443 River Pines Drive in Cypress, TX and I have an employment authorization allowing me to work legally in the U.S.

2. My husband, Dagoberto Bu-Mejia, is the son of Marta Alicia Mejia. I have known Marta and her granddaughter Ana Debora since before Dagoberto and I were married in 2014. I have also known E.G.S., who is Ana Debora's son and Marta's great-grandson, since he was an infant. E.G.S. is now five years old.

3. Marta has cared for E.G.S. ever since he was born. Ana Debora has never been able to take care of him and E.G.S.'s father has never helped. E.G.S. was born premature, and Marta was the one who took him to doctors' appointments and did whatever was necessary to make sure he survived and was healthy.

4. Everyone in our family considers Marta to be E.G.S.'s mother. She has legal custody over him, and he calls her “Mamita.”

5. E.G.S. came to live with us after he was released from detention. We went to pick him up from New York City, where he had been placed with a foster family. When we picked him up from foster care, E.G.S. was very skinny. He was very tired and slept almost all the time, for days. When he wasn’t sleeping he acted shy and scared. He threw up a lot. He wouldn’t talk to us at first, other than asking for his “mamita.”

6. E.G.S. has had a very hard time since coming to live with us, because he misses Marta and is scared to be without her. He asks for her all the time and spends the nights crying about her. I’m very worried that it is harming E.G.S. psychologically to be without Marta for so long. I do my best to comfort him, but he only wants his “mamita.” It's painful for us to watch him suffering like this. He says that Marta “abandoned him,” and I always have to tell him that is not the case, that she was taken away from him, and that she is doing all that she can to return to him.

7. I believe that E.G.S. was abused when he was in foster care. He told us that his “foster tia,” meaning his foster mother, “hit” him but when we ask him more questions, he gets very scared and does not answer. I’m worried that he was threatened and told not to say anything about the abuse.

8. The separation from Marta seems to be changing E.G.S. for the worse. In Honduras, he was a very calm child, but now he is hyperactive. He also often says that he is very nervous that he is going to be taken back to New York at any moment.

9. Here in Texas, Dagoberto’s sister and Marta’s daughter, Reyna, watches E.G.S. during the day while Dagoberto and I are at work, and we watch him at night. We do our best to take care of him, but he needs his mother.

10. I talk to Marta every two or three days, and I know she is having a very hard time being away from him. I put E.G.S. on the phone with her, and they talk a little bit, but I know it is hard for both of them to say very much because they are so sad to be apart.
11. This affidavit was read to me in Spanish prior to signing.

12. I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 14th day of September, 2018.

X

Rhina Martinez