

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

HELEN GEMMELL and MEA MARTINEZ)
on behalf of themselves and all others similarly)
situated,)
) *Plaintiffs,*)
) v.)
))
MELBA DEPENA AFFIGNE, in her official capacity)
as Director of the Rhode Island Department of)
Human Services.)
) *Defendant.*)
_____)

**DECLARATION IN
SUPPORT OF
CLASS CERTIFICATION
AND
PRELIMINARY
INJUNCTION**

DECLARATION

I, **MEA MARTINEZ**, hereby declare under the pains and penalties of perjury that the following is true and correct and based on personal knowledge:

1. I am 35 years old. I live in Woonsocket, RI.
2. I make this Declaration in support of the Motions for Class Certification and Preliminary Injunction in this action.
3. I am willing to serve as a class representative in this lawsuit on behalf of myself and other needy individuals living in Rhode Island in order to challenge delays in processing SNAP applications. I am willing to protect and advance the interests of the plaintiff class rather than acting in my own sole interest.
4. I am disabled and am unable to work.
5. I am married with three children, ages 14, 12, and 8.

6. On August 29, 2016, I submitted an online application for SNAP benefits. I had a confirmation number #Z0228711.
7. On August 30, 2016, I received an interview call from a DHS agent who went over my application. I was told on the phone to bring my paperwork into the office, ask for the "Purple Team," and the agent would approve my benefits. I was told to bring my husband's paystubs, proof of the social security benefits my children and I receive, and our lease.
8. On August 31, 2016, I went to the Woonsocket DHS office to drop off the paperwork. I did not receive any receipts or confirmation from my visit.
9. I already had an EBT card and there were no benefits on the card.
10. Since August 31, 2016, I have not received any notice from DHS about my status.
11. I went into the Woonsocket DHS office on October 3, 2016 to check on my status. I waited for around four hours, but was not seen by anyone. I did not receive any receipt from my visit. Because of my disability, going back and waiting in line at the DHS office is very difficult.
12. On December 6, 2016, a DHS worker called me and told me that their system had updated and that they had noticed that my application had not been updated. The worker told me that if I brought in four of my husband's paystubs and documentation of our housing costs, including utilities bills, DHS would approve our SNAP benefits that day. The worker also told me that if I did not bring in the documents that day, the SNAP application would be denied and I would need to start over with a new application.
13. I went to the Woonsocket DHS office on December 6, 2016 and turned in the requested paperwork. The worker at the office said that she was unable to issue my benefits because

of a computer issue. The worker told me that she would call me as soon as the computer issue was resolved.

14. On December 7, 2016, I still had not received SNAP benefits. I called DHS and spoke to the worker who tried to process my application on December 6. She told me that the computer issue had not been resolved, and that she would call me when a determination had been made about my eligibility.
15. Although my husband works, a majority of his income is automatically taken from his paychecks to pay for child support and medical expenses for his non-custodial children. Our entire income goes toward our monthly living expenses. Without SNAP benefits, it is difficult to feed my family of five. For the last three months, I have been going to the food pantries on a weekly basis to get the food we need.
16. As a representative of a plaintiff class harmed by the similar illegal DHS conduct, I am willing to protect and advance the interests of the plaintiff class rather than acting in my own sole interest.
17. In light of the foregoing, I respectfully request that this Court issues a preliminary injunction to prevent others from suffering the irreparable injury that I have suffered, direct DHS to issue the SNAP benefits to which I am entitled, and certify a class of plaintiffs in this matter.

Dated: _____

12/7/16



Mea Martinez