

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

Hispanic Interest Coalition of Alabama, et al.,

Plaintiffs,

v.

Governor Robert Bentley, et al.,

Defendants.

Case No. 5:11-cv-02484-SLB

**Exhibits in Support of
Plaintiffs' Motion For
Preliminary Injunction
And Memorandum In
Support**

Exhibit 28

Declaration of Jane Doe #4

DECLARATION DE [REDACTED]

I, [REDACTED], hereby make this declaration on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. I live in Pelham, Alabama. I immigrated to the United States and have been here for about eleven years. My first language is Spanish. I speak little English. My husband and I and our two older children are undocumented.
2. My husband and I live with our three children in a trailer park in Pelham. I have two daughters, 16 and 12 years of age, and an 8 year old son who was born in the United States. Many Latinos in Pelham live in the same trailer park where we live.
3. Recently I have experienced more racism directed towards me by white people, and I am fearful that my children will be discriminated against. I believe this new anger I'm seeing has to do with the publicity around HB 56 and the atmosphere of hatred it is creating. About two weeks ago a white woman was aggressive and mean towards me in the grocery store even though I had done nothing to bother her. I was with my children and I was fearful that she was going to hurt them or me. Because of this new atmosphere of racism and anger towards Hispanics, and especially to Hispanics that people think are here unlawfully, my husband and I are considering moving the family out of Alabama.

4. I am very fearful of returning to my native country because there is so much kidnapping, murder, and drug trafficking. It is dangerous to travel to my native country and to live there. My children do not want to go to my native country. My son has never been there and does not know anything but the United States as his home. He has his friends and activities where we live now. He plays several sports and has won trophies for his participation. My two daughters are studying and planning their future studies. One wants to be a nurse and the other one has aspirations of becoming a singer. I do not want to destroy their dreams by moving us out of Alabama, but I also do not want them to experience racism and hate at school because of their immigration status and ethnicity.
5. I am fearful that by having to register my daughters and listing myself and my husband as undocumented, that my children will face discriminatory actions at schools if HB 56 is implemented. I understand that HB 56 would require school officials to determine whether children were born outside of the United States or if they are children of undocumented parents. Even just registering my daughters as undocumented people will give them an idea that they are second class people. This upsets me very much because I do not want my daughters, their teachers, the school staff, or other students to think of them as criminals or less important people. They are teenagers just

like all their classmates. My youngest son is a U.S. citizen, but I also fear he will face discrimination at school when I have to register myself and my husband as undocumented. If these provisions are implemented, I am also concerned that the school officials are going to call the police and tell them that my family is undocumented. I am going to register my children at school because I feel I must to preserve their chances of a good future, but I am very fearful of the consequences if HB 56 goes into effect.

6. There are regular police roadblocks in front of the trailer park where we live. Because of this, I am very fearful that if HB 56 is implemented that I will be subject to interrogation and arrest by local law enforcement officers because I lack immigration status. I am also concerned that my husband could be interrogated and detained by police for this reason. I fear the police will report my husband or me to ICE if we are detained for any reason and that we will be deported.
7. My work is in cleaning houses, and sometimes I have to drive a long distance to get to my work. If HB 56 is implemented, I am worried that if I am stopped by police for any reason while driving to and from work, I would be subject to interrogation and detention because I lack the identity documents listed under HB 56. I do not have these documents and I also do not have a federal alien registration document, so I will be in danger of arrest

and deportation. I cannot leave my children. They depend on me for their food, for caring for them when they are home for school, and for transportation to their school activities. I also contribute significantly to the economic health of the family. My husband works and cannot be at the house when our children get home from school.

8. I do not have work authorization to work in the United States, but I have an economic necessity to work. I work and seek work cleaning houses in Alabama. I understand that HB 56 would make it a crime for me to do that, but I must continue to work to survive and to support my family.
9. My entire family will also be negatively impacted by HB 56 because we rent the property where our manufactured home is placed. My husband and I are buying the house, but we rent the property from the trailer park. I believe that we and the majority of the people who live in the trailer park where we live will have to leave, because most of us do not have documents to prove we are in the United States legally. The landlord will probably evict us if we cannot prove we are here legally, because if he does not, he will be breaking the law.
10. I understand that I am filing suit under a pseudonym. If my identity became public, I am afraid I could be arrested and detained by the police. If that happened, I am afraid that I would be detained and deported. I am

afraid that would lead to the separation of my family because my son is a citizen here, but the rest of us are not. People have been very hostile to me as an immigrant recently. There is a lot of anger against immigrants in Alabama right now. If some people knew who I was and that I was participating in a lawsuit to challenge HB 56, I fear that they would harass me or threaten my safety or that of my children.

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

EXECUTED this 11th day of July, 2011 in Pelham, Alabama.

/s/

A signature line consisting of a horizontal line with a solid black rectangular redaction box covering the name and any handwritten text. The redaction box is positioned above the line and extends to the right, while the line itself extends further to the right.