

**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 30

**Declaration of Jane Doe #6**

**DECLARATION OF** [REDACTED]

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

1. I was born in 1965. I have lived in the United States for about 17 years, and most of that time I have lived in Huntsville, Alabama. I came to California with my youngest child in approximately 1996, and my two older children joined us the following year. My children and I are undocumented.
2. My first husband was killed shortly after my children were born, and I moved to Huntsville to give a peaceful life to my children. My three children are now adults. My son, who just turned 18, is developmentally disabled and lives with me. I speak Spanish and understand some English.
3. My son was born with neurological problems. The only diagnosis I have ever been given is severe attention deficit disorder, but I have never had a doctor or a specialist explain my son's problem to me in Spanish.
4. My son has been in special education classes since entering elementary school. He has just finished his junior year in High School where he is in special education classes. My son needs the support of his specially trained teachers every day. His high school studies are very important for him and for me.

5. My son is in a vocational program through his special education classes, and he has to work a certain number of hours this year in order to obtain his special education high school diploma. I believe that this work experience and subsequent diploma will help my son obtain some kind of simple employment after graduation from high school, and this will improve his life greatly. He is learning skills that will help him work in the food processing industry. I believe that my son will contribute more to society if he can work and care for himself in this way. I understand, however, that he cannot get a work permit and that his soliciting work will be a crime if HB 56 is implemented.
6. My son is generally physically capable, but he is unable to care for himself without supervision, or cook or drive because he is constantly distracted. I guide him through all aspects of his life. I expect that he will have to live with me and depend on me his whole life.
7. Because of my son's dependence on me, I am very fearful of being arrested and deported. I work cleaning houses, and I have to drive myself to various work sites. I also regularly drive my son to and from school, although sometimes a friend does it for me. I do not have a driver's license, so I fear getting stopped by the police and arrested for not having a license or proper immigration documents. If HB 56 goes into effect, and the police are able to

check my immigration status, I fear I will be deported and my son will be in danger because of his inability to care for himself without me.

8. I fear sending my son to his final year of school this fall because of HB 56's requirement that the school register him and myself as undocumented immigrants. I will be forced to comply with the registration requirement despite my fears, because my son's special education classes are so critical to his development and possible future employment. In addition to wanting the credentials of earning a high school diploma, my son is very excited about the idea of graduating in 2012. If my son was unable to continue his studies because of his undocumented status, it would be extremely hard on him. He would be terribly disappointed and he would not understand why he could not attend school any longer or why he would not be able to graduate.
9. My son has been bullied in school because of his developmental disability. He has been teased, given terrible nicknames, and one time, he was intentionally injured by another student. I am grateful that the school officials have tried to protect my son, but they can't always do so. I fear that by having to register myself and my son as undocumented under the new requirements of HB 56, my son will be teased and mistreated further by people at his school. My son is not able to distinguish what information is

appropriate to tell others, so I fear he will give the information about having to register as undocumented under the new HB 56 requirements to others who could harm him.

10. I am also afraid that my son will be detained because he lacks immigration papers if HB 56 takes effect. He does not drive, but I fear that he would be detained in some other situation by police, given their new powers to enforce immigration law under HB 56. My son does not have the proper alien registration documents required by HB 56, and this violation would be a misdemeanor. If detained, my son would not understand what was happening to him, and he would be unable to take care of himself. I would fear for his life if he were deported to Mexico, a country he does not know and does not consider his home. He has only considered Alabama his home.

11. I fear the consequences for my family and for myself if HB 56 goes into effect. My son is in danger from HB 56 registration requirements in his school, from HB 56 criminalization of his solicitation of work that he needs to do in order to graduate from his special education program in High School, and in the possibility that because of HB 56, police will investigate his immigration status if my son is detained for any reason. My son would not be able to care for himself if detained and deported, and that fear affects me greatly. I am fearful that I will be stopped and detained for driving

without a license, and then deported, because of the new powers that police will have under HB 56. I have to drive regularly in order to work and to transport my son to school. It would be terrible for me and for my son if I were deported because he is not able to care for himself.

12. I am greatly concerned that my son would face retaliation, bullying, and threats if my participation in this lawsuit was made public. There is a lot of negative rhetoric about how undocumented immigrants cost our school system money and I am particularly concerned that if it was known that my son is enrolled in special education classes that we could face retaliation. I am also fearful that I would lose my house-cleaning jobs if it were known publicly that I am participating in this lawsuit. I live a quiet life, and if my participation in this lawsuit were known, it could upset the careful routine and peacefulness that I have created so that my family will be safe here.

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

EXECUTED this 7th day of July, 2011 in Huntsville, Alabama.

\_\_\_\_\_/s/ [REDACTED]\_\_\_\_\_  
[REDACTED]