

**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' Reply In Support of  
Motion For Preliminary  
Injunction**

# Exhibit 4

**Supplemental Declaration of Scott Douglas  
*On behalf of* Greater Birmingham Ministries**

## **SUPPLEMENTAL DECLARATION OF SCOTT DOUGLAS**

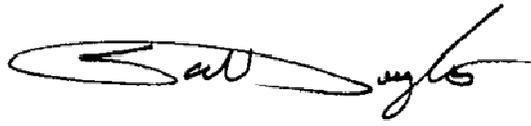
I, Scott Douglas, hereby make this declaration based on my personal knowledge and if called to testify I could and would do so competently as follows.

1. My name is Scott Douglas. I am the Executive Director of the Greater Birmingham Ministries (“GBM”), based in Birmingham, Alabama. I am providing this supplemental declaration to give further information on the harm HB56’s education provision will cause to both future and present school age children.
  
2. Section 28 directly interferes with GBM’s mission, particularly with regard to economic justice. As I explained in Paragraph 11 of my first declaration, undocumented individuals are afraid to enroll their children in school because of HB 56. Our mission to provide economic justice and improve the lives of all is undermined by Section 28 because we can have no economic justice if children are uneducated and deterred from going to school. In addition, we have had to divert resources from our regular duties to educate parents about Section 28, and will now have to divert more resources to Section 28 because the state keeps changing what it means to “enroll” in Alabama schools. This will only create more confusion as the school year is about to begin.

3. GBM and its member organizations have undocumented families with children of all ages coming to their faith communities from out of state. Undocumented people move to Birmingham from other parts of the country for many reasons - jobs, education and relocation from larger cities, among other things. No matter what time of year these families arrive, if they have not lived in Alabama before, they enroll their children in Alabama schools for the first time.
4. As I stated in Paragraph 11 of my first declaration, GBM is affected by HB 56's education provision because our member congregations serve a large number of school-age children. This includes families that have young children who haven't entered school yet, but will begin school (kindergarten) for the first time next year.
5. If allowed to go forward, HB56's education provisions will harm both current and future students in Alabama.

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

EXECUTED this 15th day of August, 2011 in Birmingham, Alabama.

A handwritten signature in black ink, appearing to read "Scott Douglas", enclosed within a thin black rectangular border. The signature is stylized and cursive.

---

Scott Douglas