

**EXHIBIT "1"**

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

HISPANIC INTEREST COALITION )  
OF ALABAMA; et al., )

Plaintiffs, )

v. )

CASE NO. 5:11-CV-2484-SLB

ROBERT BENTLEY, in his official )  
capacity as Governor of the State of )  
Alabama; et al., )

Defendants. )

RT. REV. HENRY N. PARSLEY, JR., in )  
his official capacity as Bishop of the )  
Episcopal Church in the Diocese of )  
Alabama, et al., )

Plaintiffs, )

v. )

Case Number: 5:11-CV-2736-CLS

ROBERT BENTLEY, in his official )  
capacity as Governor of the State of )  
Alabama; et al., )

Defendants. )

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

Case Number: 2:11-CV-2746-LSC

STATE OF ALABAMA; )  
GOVERNOR ROBERT J. BENTLEY, )

Defendants. )

AFFIDAVIT OF HENRY N. PARSLEY, JR.

My name is Henry N. Parsley, Jr. I am over the age of 19 years and am competent to give this affidavit. I have personal knowledge of the matters stated herein. This affidavit is submitted in support of a motion for preliminary injunction filed by Plaintiffs in Case No. 5:11-CV-2736-CLS, styled *Rt. Rev. Henry N. Parsley, Jr., etc., et al., v. Robert Bentley, etc., et al.*

I am the Episcopal Bishop of Alabama and the spiritual and administrative leader of the Episcopal Church in the Diocese of Alabama ("Diocese"). Established in 1830, the Diocese encompasses some 33,000 members in 91 parishes and worshipping communities and eight college campus ministries. The Diocese includes approximately the northern two-thirds of Alabama. In this role, I oversee and provide direction for all of the parishes and ministries of the diocese. In general, the Episcopal Church is organized into dioceses led by bishops in consultation with representative bodies of the diocese and the larger church as a whole.

The Episcopal Church is a fellowship within the one holy catholic and apostolic church, propagating the faith as set forth in the Bible and the Book of Common Prayer. "The Episcopal Church strives to live by the message of Christ, in which there are no outcasts and all are welcome. Walking a middle way between Roman Catholicism and Protestant traditions, we are a sacramental and worship-oriented church that promotes thoughtful debate about what God is calling us to do and be, as followers of Christ." Welcome to the Episcopal Church! at <http://www.episcopalchurch.org/visitors.htm>.

Members of the Episcopal Church are expected to confess and accept Jesus Christ as Savior and follow and obey His commands. The Baptismal Covenant of the Episcopal Church contained in the Book of Common Prayer specifically outlines the requirement that church members respect the dignity of every human being. This foundational covenant emphasizes that we are to serve Christ in all persons, loving our neighbors as ourselves. This is the teaching of Holy Scripture and how we live our faith.

The Episcopal Book of Common Prayer also includes the Articles of Religion which outline the responsibility of members of the Episcopal Church, including those in Alabama, to welcome and help others:

Albeit that Good Works, which are the fruits of faith, and follow after Justification, cannot put away our sins, and endure the severity of God's judgment; yet are they pleasing and acceptable to God in Christ, and do spring out necessarily of a true and lively Faith; insomuch that by them a lively Faith may be as evidently known as a tree discerned by the fruit.

Article 12 of the *Articles of Religion* available at <http://www.anglicanonline.org/basics/thirty-nine-articles.html>.

In faithfulness to the teaching of Holy Scripture and our Baptismal Covenant the Episcopal churches in Alabama engage in the following activities, among others, to meet the needs of all people:

- Community Kitchens: A program to provide nutritious meals to the hungry, homeless and working poor without regard to situation or condition.
- Literacy Programs: Initiatives in several Alabama Episcopal churches to tutor adults and children in reading and English as a second language.
- Iglesia de la Gracia: A parish in Huffman, Alabama dedicated to ministering to persons of Hispanic descent.
- “55<sup>th</sup> Place” and other community outreach thrift stores: Not-for-profit organizations that re-sell donated items to raise money of which 100 percent is donated to organizations and people in need in Alabama.
- Housing: Episcopal Place and other programs that provide subsidized housing for elderly and disabled Alabama residents with limited income.
- Hospitality for the Homeless: Through the Birmingham Hospitality Network and other programs, members of Alabama’s Episcopal Churches provide temporary housing and meals to homeless individuals at their churches. Birmingham Hospitality Network is an ecumenical program that also includes Methodist and Roman Catholic churches as well as congregations from other faiths.
- Church Day Cares: Day Cares sponsored by the Episcopal Church and housed at churches throughout Alabama provide care on a regular basis to children who are church members and others without regard to immigration status.
- Greater Birmingham Ministries: Dedicated to providing meals, temporary shelter, clothing, job training and education to Birmingham’s homeless and working poor.
- Health Care Clinics: Free clinics to provide medical services to those in need in Decatur, Gadsden and Anniston, Alabama.
- Beans and Rice Ministries: Churches distribute beans, rice and other food to those in need. At Grace Episcopal Church in Anniston, members give the food "to anyone no questions asked." *Get Connected!*, Grace Episcopal Church, available at <http://www.graceanniston.org/pages/?pageID=30>.
- Camp McDowell: The camp and conference center for the Episcopal Church in the Diocese of Alabama provides summer camps and other activities for children and adults. The McDowell Environmental Center also provides outdoor learning experiences for school groups. The camp is open to all persons regardless of their immigration status.

In providing or supporting these ministries, we do not – and would not – refuse to assist any person in need because he or she lacked legal immigration status. Our church regularly offers two sacraments instituted by Christ, Holy Baptism and Eucharist, as well as the sacrament of Marriage, without regard for immigration status. As the law is currently written, individuals

administering and facilitating these sacraments, along with the other ministries described above (i.e., transportation, shelter, fellowship), could be engaging in criminal behavior.

While I recognize the need for sensible immigration reform, this Anti-Immigration Law is an extreme law that does not respect the dignity of all God's people and would criminalize the church's ministry and hinder the free exercise of our faith, specifically the right to follow the Biblical mandate to welcome the stranger and share God's love with others, regardless of their immigration status. As a priest and follower of Christ, this Law will affect me in the day-to-day exercise of my faith and the ministries of the clergy and people of this diocese. Even at this juncture, the Law is having a chilling effect on our ministries by making immigrant persons afraid to be involved in both church and community.

If this law is permitted to take effect as currently drafted, our members will be prohibited from practicing their religion or, at the very least impeded in doing Biblically-mandated good works, for fear of criminal prosecution for knowingly or recklessly serving an undocumented individual. This law does not respect the free exercise of religion to minister to our neighbors and the stranger in our midst, as the Bible unequivocally states we must do. Leviticus 19:33-34; Deuteronomy 10:18; Zechariah 7:9-10; Matthew 25:35-40; Mark 12:31.

Sadly, this statute creates a climate of fear, which is not helpful in building a healthy and well-adjusted community. I am seeking relief because the law will prohibit, under threat of criminal prosecution, me as well as the members of the faith community which I lead from exercising our right to freely practice our Christian faith and service to God and others.

Further affiant sayeth not.

Henry N. Parsley, Jr.  
Henry N. Parsley, Jr.

STATE OF Alabama )  
COUNTY OF Jefferson )

Before me, the undersigned notary public in and for said county in said state, personally appeared Henry N. Parsley, Jr., who is known to me and who, being by me first duly sworn, did depose and state that he has read the foregoing Affidavit and the statements contained therein are true and correct.

Given under my hand and official seal on this the 15<sup>th</sup> day of August, 2011.

[SEAL]

Peggy B. Turner  
Notary Public

My Commission Expires: 4-11-15