

EXHIBIT “14”

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 AL MANZELLA

My name is Al Manzella. 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 the Plaintiffs in the 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 executive director of Catholic Social Services for the Diocese of Birmingham in Alabama. I have been in this position for the past twelve years. Catholic Social Services is the agency designated by the Bishop to execute and administer policies and programs that reflect Catholic Social Teaching. The mission is based in Biblical teaching and in Church Tradition. To achieve this goal we operate a network of social services agencies across the diocese: nine Centers of Concern which offer direct and emergency assistance; five Catholic Family Services offices that offer counseling to families and individuals and adoption and foster care services; Hispanic Catholic Social Services that offers an array of services to Hispanic families and individuals; Apostolate for the Aged that serves the elderly, including the Hispanic community; and the Office of Peace and Justice that works with parishes and communities to promote and advocate for justice in policies and practice. In addition we provide financial, clothing, food, shelter, medical, legal, English language, transportation, and educational assistance to families and individuals. We have 28 full-time staff and well over 200 volunteers. Our Hispanic community has a client base of well over 100,000 people in North Alabama. In addition in 2010 we served over 86,000 non-Hispanics.

Because our faith mandates that we serve all people as our brothers and sisters without regard to legal status or race, religion, and ethnicity we cannot turn our back on our brothers. We served the African American community when it was not legal to do so in integrated settings in Alabama.

Essentially all the services we provide would be criminalized under HB56. People in the Hispanic community, whether documented or not, trust the Church to assist them with their social service needs without fear of government intervention. HB 56 has reinforced their mistrust of other agencies and will increase demands on our services.

People in the Hispanic community are afraid. Recently a mother gave her infant child to us as she was undocumented and was certain that she was soon to be deported. We know that children are staying away from their schools, again out of fear that either they or their parents will be deported. Children with citizenship are fearful that they will be separated from their parents.

The majority of the immigrants we serve are from Mexico, Central America and South America. The next largest ethnicity is African, predominantly Kenyan citizens, although there are other clients from the Democratic Republic of Congo. Although we do not ask for documentation of their immigration status, I am confident that a large majority of

them are undocumented. Immigration status, legal or not, does not change their need for help.

This recently passed anti-immigration criminalizes what we do. If we were not allowed to offer our services, an already marginalized community would become completely neglected and ignored.

We assist immigrants in finding housing, along with health care and other assistance. At times, it has been necessary to take an individual to the hospital, a shelter or back to their home – criminal acts under the new law.

Our volunteers would be committing criminal acts when they teach ESL classes or offer advice regarding income tax preparation to those who are voluntarily complying with federal and state law by paying income taxes.

We do not receive any government funding. We do receive financial assistance from individual donors, many of whom will decide they do not want to put themselves in a questionable position and discontinue their assistance.

We have already seen a decline in attendance at Sunday Mass and participation in the sacraments.

These people are law abiding, family centered citizens that contribute positively to our community. Most are hard working, family oriented people. Their love for family and friends should serve as an example to us, not a threat. For example, you will not see a Hispanic person who is homeless. The reason for this is that they take care of one another. They have a deeper sense of commitment to their fellow man than we. Arguably they are living God's teachings better than we.

The immediate and irreparable harm caused by this law manifests itself in the fear we have experienced coming from the Hispanic community. Fear from those with proper documentation, in the process of legally obtaining proper documentation and those who have none. It is the same fear of repression at the hands of law enforcement and government that caused them to flee to this country in the first place. They got here, just as our ancestors did years ago. They are entitled to fair and respectful treatment, just as our ancestors were years ago. Labeling them and those who serve them as criminals is on its face unconscionable.

Even though the law is not yet in effect, we have had a number of individuals come in or call on behalf of a spouse or loved one who has been placed in the custody of ICE. Of those detained very few are because of criminal charges or ongoing investigations. For the most part the detainees/deportees have been fathers stopped for alleged traffic violations.


As of January of this year, undocumented children lost health coverage from Blue Cross Blue Shield. Without health insurance, children are not able to participate in certain

extracurricular activities such as sports. This kind of divide will only be exacerbated by HB 56.

We work with families who have both documented and undocumented children in their homes. The undocumented children are usually older. Many of the families have come to us because the child has lost his or her motivation to attend class and/or study. Most of these children argue that they won't have many options after high school and would just as soon begin working. Even if they could afford college, they know that they have a very low chance of being hired after graduation. The inequalities created between siblings could worsen.

Our religious beliefs are very clear in how we should treat others. There is no justification for the discrimination, exclusion, and hate that results from a law like HB 56. The law forces a choice between practicing our religion and being labeled a criminal. My religion teaches that all are created equal, as does the Declaration of Independence. The anti-immigration act restricts my right to freely exercise my religion because it causes me to treat people unequally, depending on their immigration status.

Further affiant sayeth not.

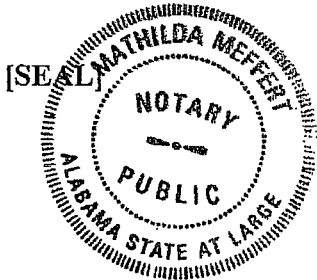


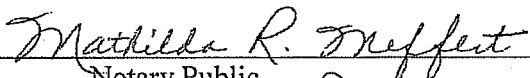
Al Manzella

STATE OF ALABAMA)

COUNTY OF JEFFERSON)

Before me, the undersigned notary public in and for said county in said state, personally appeared Al Manzella, who is known to me and who, being by me first duly sworn, did depose and state that she has read the foregoing Affidavit and the statements contained therein are true and correct. Given under my hand and official seal on this the 17 day of August, 2011.





Notary Public
My Commission Expires: June 19, 2012