

**EXHIBIT "16"**

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 JOHN F. PARKER

My name is John F. Parker. 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 the Principal of St. James Catholic School in Gadsden, Alabama. St. James School was founded in 1912. I have been with St. James School for the past nine years. I am responsible for the education and safety of our 175 students. We have 19 paid teachers and staff as well as many volunteers from the Gadsden community. We provide a rigorous education, as well as after school programs for need based students. Our parents are active participants in our school program, several of whom regularly give rides to needy students.

Our mission at St. James is based on the Church begun by Jesus Christ. This mission takes its beliefs both from the Bible and from tradition handed down apostolically over 2000 years. The Bible says to teach all nations. Jesus preached to the Gentiles, he accepted the Samaritan woman at the well and he fed the hungry. We follow the Bible's teachings through our various food drives, service organizations and fundraisers to serve hundreds in our community. We do not check the immigration of status of people we serve in the community.

We educate students of various ethnicities and backgrounds. Our current student body is 42% Caucasian, 30% Hispanic, 15% African-American, 11% Mixed and 2% Asian.

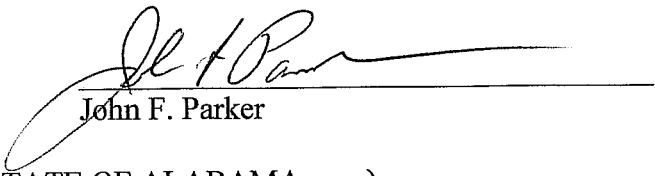
HB 56 is contrary to our mission of teaching children. This law hinders our ability to provide education to children, to teach the Catholic faith to immigrants, to provide transportation to immigrants and to feed children and adults through outreach programs. HB 56 teaches our children to be intolerant of others. This directly affects our ability to teach the faith as society ignores its Christian beliefs. Even worse, it is clear that HB 56 will affect another generation of Alabama children - white, black and brown - and teach them to embrace intolerance.

In practical terms, HB 56 discourages attendance at St. James because of the threat of being arrested. Priests will be affected because they could be arrested for giving out the sacraments, providing counsel, or saying Mass for undocumented immigrants. People who are documented will also be discouraged to put themselves in a position to be harangued by police, even if by mistake. In my judgment, HB 56 will cause enormous disruption to St. James' everyday activities.

We are already seeing the effects of HB 56. This law has stopped many families from volunteering at the school for fear of becoming detained or, perhaps, arrested. Parents are afraid to register their children for school. This law prevents me in my individual and official capacities from assisting people as I do every day. I would be a criminal for

assisting someone on the side of the road, as would the school volunteers. This law would criminalize helping children of undocumented individuals and keep us at St. James from fulfilling our Christian duty to provided charity to mankind.

Further affiant sayeth not.

  
John F. Parker

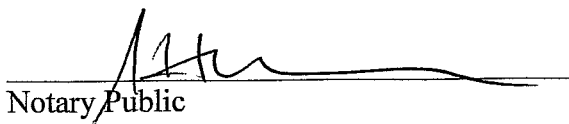
STATE OF ALABAMA     )

COUNTY OF ETOWAH     )

Before me, the undersigned notary public in and for said county in said state, personally appeared John F. Parker, 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 15 day of August, 2011.

[SEAL]

  
Notary Public

MY COMMISSION EXPIRES DECEMBER 5, 2014

My Commission Expires: \_\_\_\_\_

