

EXHIBIT 16

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare:

I make this declaration based on my own personal knowledge. If called to testify, I could and would competently state what follows.

1) I was born in 1976 in Mexico, and I am Latino. Spanish is my primary language, and I speak limited English only. I reside in Dalton, Georgia. I moved to nearby Calhoun, Georgia, eleven years ago, and came to Dalton four years ago. I have lived here for a very long time. I enjoy the community, and get together regularly with friends to do things like play basketball or to just hang out, when we aren't busy working. I think of Dalton and Georgia as my home, and I feel comfortable in this community.

2) I help support my father, sisters, and one brother who live in Mexico. I came to the United States because I needed to find work to help support my family.

3) I am very fearful of the effect that HB87 will have on me and on my community in Dalton, Georgia. I do not possess any of the documents that HB87 requires to prove that a person is permitted to be in the United States, like a current driver's license or state identification card, and based on my past experience, I expect that police will be looking for ways to stop me and question me about my

immigration status. For example, when I was living in Calhoun, I was stopped three times in three months by the police for driving without a license. I was fined each time, and I then had to stop driving because I could not afford it. I do not believe the police could have known I did not have a license until after the stop had occurred. One of three times I was stopped I am sure it was because of my race and my Latino appearance. I saw a policeman looking at me when I left a store, and the policeman followed me home. When the policeman made me pull the car over, I asked him why he had stopped me. He hesitated and then looked around the car for a problem. He told me it was because the windows were tinted and the windshield was cracked. I believe he was looking for some pretext after the fact to justify pulling me over.

4) After that incident, I have driven as little as possible. I sold my car after I moved to Dalton and now I ride my bicycle, walk, or get rides from friends instead. I am afraid that HB87, if implemented, will cause police to stop me from riding my bicycle or from walking from place to place. Under the new law, if the police stop me, they will have the right to ask me for immigration documents, even if I am not driving a car. I have already been profiled by the police, and I am very fearful that this will happen again if HB87 goes into effect.

5) HB87 is going to make my life very difficult. It will be harder to get my friends to give me rides to go to places like the grocery store, because all of us are going to be more afraid of the police. If HB87 is implemented, I plan to go out of my house as little as possible. I will no longer feel safe walking to the park to play basketball with my friends.

6) I have been robbed several times in the past few years, and I think there are others in my community who criminals have also targeted because they think we Latinos are less likely to use banks and more likely to hide cash in our homes. I have gone to the police to report these robberies. But if I am robbed again, I am not sure I will report the robbery to the police for fear of being arrested myself for not having immigration documents. I, and I think my friends as well, will avoid having contact with police if at all possible, no matter the circumstance.

7) I have a matricula consular from the Mexican government, and I have been able to use it as an acceptable identification document in many places in the past. I used it to open accounts at City Hall in Calhoun, Georgia, for water and electricity service to my home. I also used it when I went to the police to report the robberies. I also regularly use my matricula in banks and stores.

8) I am afraid of the implementation of HB87 because I fear being arrested by police and questioned about my immigration status. I fear that if the

police discover I do not have the authorization to be in the United States, that they will contact ICE and that they will deport me. If HB87 goes into effect, my life will be changed dramatically. The threat of HB87 has made me consider leaving the state, but this is my home and I want to stay here. I know this area well now, and I have friends here. It would be very difficult for me to go somewhere else, where I do not know anyone and do not know how to get around to places I need to go. It is difficult to completely start over in a new place, and I hope I do not have to do it.

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

Date: 6/1/2011
