

EXHIBIT 18

DECLARATION OF SILVIA AMERICA GRUNER

I, Silvia America Gruner, hereby declare:

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

1. I am the president and founder of the Coalition of Latino Leaders (CLILA).

I am a Mexican national with permanent residency in the United States. I currently reside in Whitfield County, Georgia.

2. CLILA is a not-for-profit, volunteer-based membership organization in Dalton, Georgia, that started working in May 2006. It was incorporated in February 2007, and was awarded 501(c)(3) status in December 2008.

3. CLILA' s mission is to develop competent, caring Latino grassroots leadership with a variety of skills necessary to address the critical issues that challenge the Northwest Georgia Latino community. We strive to advocate alongside our fellow immigrants for human rights and civil rights, and to encourage members of the Latino community to engage in civic activities and to participate in the political process, by providing voter registration, voter education, and citizenship education. We have about 150 regular members and about 1,000 participants in different activities.

4. CLILA provides a variety of services to the community: Advocacy and community organizing for immigrants' rights; citizenship classes; English classes; Homework Club for children whose parents don't speak English; computer classes for people who don't have access to other computer resources; assistance in completing applications for legal residency and citizenship; community meetings on different issues affecting the Latino community such as: workers' rights, legislative updates, how the U.S. legal system works, and educational rights; voter registration and education, and forums to bridge gaps between immigrant and native-born communities. Also, once we identify that children, or on few occasions parents, in our community are eligible for food stamps, we hold community meetings instructing parents on how to apply for food stamps. At the meetings we instruct parents where to go to apply for food stamps and provide assistance to fill out the forms if such assistance is needed. All of our services are provided regardless of the individual's immigration status.
5. Our programs and services are provided for community members living in Dalton, Whitfield, and Murray counties in the state of Georgia. Our members are Latino immigrants, mainly low-income families. We accept members without inquiring about their immigration status in the United

States. The average number of people we serve a year is about 1,000 individuals, with an estimated 60% undocumented immigrants.

6. The goals of our organization include advocacy and community organizing. We develop and implement an advocacy agenda to impact local, state, and federal policy and services. We work on building alliances and coalitions to build power and affect positive social change for the Latino community. We encourage civic participation to empower the Latino community to fully participate in U.S. democracy, better integrate into the U.S. system, and make use of their voting rights/responsibilities. One important goal is to increase the percentage of Latinos voting in 2012 elections, especially in this time of increasingly negative anti-Latino initiatives and politics. We further empower Latino community members to claim their rightful place in the civic, cultural, and economic life of Northwest Georgia and we offer opportunities for Latinos to positively showcase our culture to the general community. We also encourage Latinos to build bridges with other groups and reduce ethnic tensions.
7. CLILA also focuses on leadership development by preparing Latino grassroots leaders to address the critical issues challenging the Northwest Georgia Latino community. We encourage parent involvement by asking

parents to advocate for their children, and be more involved in their children's education.

8. CLILA has already been harmed by the passage of HB 87 in many ways, and these problems will only get worse if the bill goes into effect. As a result of the adoption of HB 87, attendance in our different programs and services decreased significantly because our members fear that their association with our organization will cause them to be identified as undocumented by the police. In the short time since the law passed, it is already affecting our goals and regular activities because people are afraid of coming to our office thinking they could be stopped, interrogated, and detained by local law enforcement on their way here due to little more than their Latino appearance. Our attendances for the English classes and homework club have also decreased significantly since HB 87 passed. People who used to attend these classes have expressed that they feel there is no use to continue trying to attend because they fear they could be stopped and detained by local police at any point and subsequently deported.
9. CLILA's resources, both in funding and in staff and volunteer time, have been diverted from our priority projects because of the passage of HB 87. For example, the numbers of calls we receive daily have increased by 400%

due to the adoption of HB 87. People are calling to ask about the new law or with questions about how it will be implemented. We had to increase the number of hours invested in returning calls. As a result of this demand for information on HB 87, we had to put on hold our citizenship classes because we could not adequately staff them. People in the process of gaining citizenship are being negatively affected because we do not have anyone available to provide information or to practice the citizenship questions with them, nor to help fill out their applications.

10. CLILA itself could be forced to close its doors because of HB 87. Seventy percent of our funds come from the grassroots community we serve, and as we have seen our participation numbers decline our funding is very likely to decline as well. I am very alarmed that we may not be able to continue operating in our current form. This risk would be even higher if the law is allowed to take effect, because our community will become even more alarmed and scared if that happened.

11. Because 60% of our members and the people we serve are estimated to be undocumented, implementation of HB 87 will make it impossible for them to get around, and even its mere passage has already had profound consequences. People who used to offer Latinos rides are now refusing to

provide assistance for fear of being charged with a crime under HB 87. Many of our members already cannot drive because they lack a Georgia driver's license. Also many of our members are working or looking for a job without proper documents, and they are afraid their employers will fire them soon because of HB 87. At least three employers that do not want to be identified have told us that they will not be able to keep open their businesses because of fear of being charged with penalties for hiring undocumented immigrants under HB 87 and fear of losing business once immigrants begin to flee from Georgia. They are waiting to see if lawsuits challenging HB 87 succeed; otherwise they plan to terminate their employees thinking they will be in constant risk of being charged with crimes.

12. CLILA provides transportation to certain events for many members, including members that we know do not have lawful immigration status. Our drivers occasionally exceed the speed limit in order to make it to our designated locations in time. We also transport undocumented children and adults from roadblock sites to our office or their houses when their relative has been arrested and the children do not have anywhere else to go or anyone to turn to. Because we provide these services constantly and are

likely to continue it in the future, we could be criminally charged of transporting individuals under HB 87. If implemented, HB 87 will interfere with transporting members of the organization to marches and rallies across the state, as well as to different local community resources and very frequently for English classes or community meetings. It will thus greatly impact our goals. HB 87 makes it impossible for CLILA to provide services to our community members without discriminating against them on the basis of their immigration status or risking criminal prosecution under the new law.

13. For example, CLILA intends to help with the upcoming Dreamer Conference for undocumented immigrant students. We intend to help students come to Georgia and we intend to provide transportation for them while here. HB 87 will significantly affect our plans because it will make CLILA criminally liable for transporting, assisting and enticing undocumented individuals into the state of Georgia.

14. CLILA sends its announcements and press releases to all local Spanish speaking media, which circulate in Northwest Georgia and Southeast TN, with the purpose of inviting people, including undocumented individuals, to attend our activities and community meetings and to stay informed about the

rights and issues affecting the immigrant community. CLILA also promotes its activities by inviting people to listen to two Spanish speaking radio stations which also air in Tennessee and Kentucky. CLILA sends its announcements and press releases to a newspaper in Chattanooga, TN because is the largest metropolis that is close to us, and it has a large number of immigrants in need of our services. As a result of these announcements, we receive visits from individuals from those states and we provide them services such as community meetings, immigration workshops, citizenship classes and others. HB 87 poses a threat to all these programs by labeling these actions as enticing undocumented immigrants into Georgia. Because we are likely to continue providing these services, HB 87 makes CLILA liable to criminal prosecution under the law. The alternative of ceasing to provide these services will cause a loss of membership and stand against the goals of our organization.

15. The additional document requirements set forth in HB 87 also bring problems to our organization. It increases the fear of racially profiling within our community and its implementation greatly affects our organization and our members. Many of our members do not possess any documents within list and therefore are afraid of leaving their house if HB 87 is enforced. As a

result our attendance will decrease and members who usually help us set up for events are expected to stop volunteering for fear of being asked for their documentation. For example, people who come to apply for residency at our office do not have a status or any documentation. Attendance of our workshops is thus expected to decline greatly.

16. Fear of local law enforcement in our community already exists because of the 287(g) programs operating in some parts of the state. Now with HB 87, members think the police presence in the streets will increase and detentions of Latinos will also increase. I expect attendance at CLILA rallies to further decline due to fear of police intervention and arrests due to possible offenses being committed by certain members in the crowd. Many members have expressed concern about participating in our events because they might be at risk of being charged with a crime or have their immigration status questioned simply due to their presence, lack of documents required under HB 87, and/or Latino appearance.

17. Members have also expressed concerns that HB 87 will increase racial profiling by law enforcement because officers will feel empowered to stop and interrogate many individuals regarding citizenship status regardless of whether they have committed a traffic violation (as we have seen in

communities that have an active 287(g) program). There is also a fear of roadblocks being implemented to check immigration status. We expect to see these types of injustices increase especially in the city of Dalton where more than 50 percent of the population is Latino. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 1st day of July, 2011 in Dalton GA.


Silvia America Gruner