

# EXHIBIT 20

## DECLARATION OF ADELINA C. NICHOLLS

I, Adelina C. Nicholls, 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 executive director of the Georgia Latino Alliance for Human Rights (“GLAHR”). I was born in Mexico, but I gained my U.S. citizenship in 2008. I have been working with GLAHR since its founding in 1999.
2. The organization was initially called the Coordinating Council of Latino Community Leaders. In 2007, some revisions were made and the name of the organization was changed to GLAHR. The organization is a statewide, grassroots membership organization that emphasizes community outreach in order to ease the transition of Latino immigrants into a new culture. Everything is run by me and another full-time staff member.
3. GLAHR achieves its goal of easing transition into a new culture by educating the community about city ordinances, which they would otherwise not be aware of due to cultural differences (i.e. noise ordinances, policies on taking out trash, etc). It also serves to inform the community about their rights. GLAHR provides leadership training, community forums,

community organizing, forums about schools and the rights of children, and monthly meetings on issues the community faces with immigration.

4. The majority of GLAHR's members are immigrants. Individuals are accepted into GLAHR programs and functions regardless of their immigration status in the United States. Some of the members were born in the United States and some were born abroad. Many of GLAHR's members lack immigration status in the United States.
5. GLAHR's central goals are to inform our members about the laws of the state of Georgia and of city ordinances by which they must abide (such as loud music or the allowable number of cars in driveways, when to take the trash out, etc.).
6. Another important function of GLAHR is to act as community organizers on behalf of immigrants in Georgia. GLAHR hosts 7 hotlines, which receive daily complaints about mistreatment of immigrants throughout the state of Georgia. This is an important outreach aspect of GLAHR. Attendants document individual complaints from members of the community about topics such as detention of immigrants, arrests, or abuse by police officers. Other reports are about domestic violence, housing, and labor complaints. The attendants take down information and GLAHR functions as a mediator

in order to help immigrants who have been persecuted or denied their rights. We also issue open record requests on behalf of detainees in order to ensure that their rights have not been violated and request statistics from sheriffs' offices to determine the number of Latinos unfairly apprehended due to certain policies.

7. With the implementation of 287(g) and Secure Communities programs in Georgia, however, we have had to divert some of our attention and resources towards Know Your Rights Campaigns. However, even with the roll-out of these programs and laws in Georgia, GLAHR had been able to continue to focus some of its resources on providing cultural transition guidance and information on city ordinances.
8. The implementation of HB 87 would completely end our ability to conduct education around local ordinances, which is a core mission of our organization. Already, since the passage of HB 87, we have had to focus *all* our efforts on determining the effect of HB 87 in different areas, and educating our members on the law. It leaves virtually no time for any other programs. This is a significant shift in GLAHR's resources.
9. HB 87 is also drastically impacting our ability to have members attend our events. In the past 3 weeks following the passage of HB 87, we have had

about 20 community forums and all our members have expressed concerns about attending the meetings and being targeted by the police. Many have closed their businesses and have decided to leave the state. They are afraid of being targeted simply for attending meetings to learn about HB 87. Fear from the impact of HB 87 adversely affects our short-term goals of informing the community about immigrants' rights and our long-term goals of educating immigrants about ordinances and cultural differences. Sadly, we have already seen a drop in our membership since the passage of HB 87.

10. In the short period since the passage of HB 87, our members have already expressed concern about the impact of the bill. For example, our Latino members have expressed concerns about how the perceptions of Latinos by the community at large have changed. They used to be welcomed by the community but now they perceive more support for segregation.

11. For example, right after the passage of HB 87, we received an intake from a Latino waiter at a restaurant who reported having received a receipt for a meal with this inscription: "I am glad you are leaving this country soon".

12. Several GLAHR members, including some members who lack any of the immigration documents listed under HB 87, believe that they have been stopped or arrested in the past based on their race/ethnic appearance or

language ability. Now, they believe they will be subjected to prolonged detention and arrest by local law enforcement if HB 87 takes effect. They are also fearful of any interaction with law enforcement departments because they fear they will be subjected to prolonged detention after a routine police encounter while police attempt to verify their immigration status.

13. In addition, since the passage of HB 87, we have received reports that businesses that have hired undocumented individuals suddenly decided not to compensate their employees. When the employees complain, the businesses threaten to call immigration.

14. Other complaints, especially from Gwinnett and Cobb Counties, include numerous reports of immigrants being pulled over by the police without having committed a traffic offense and then being detained for lack of a driver's license. One person told us that since the passage of HB 87, he has been stopped three times, even though he is a citizen, because of his Latino appearance. In another report, a police officer in Fort Valley took away a person's Mexican passport claiming that it was a fake document. The officer refused to return that document. To this date this individual's passport has not been returned. In general, the feeling is that law

enforcement officers are free to target immigrants in Georgia following the passage of HB 87.

15. Also, some of our members often need to secure services for a child and to do so, sometimes need to prove their own identity as a parent to the child. They fear that HB 87 will make it impossible for their children to attain services if they lack the specific documents required under HB 87.

16. Many GLAHR's members use consular-issued identity documents or "matriculas" as their primary form of photo ID for various transactions. These members present their matriculas to cash checks, to show proof of relationship to enroll their children in Georgia public schools, or to gain admission to public buildings. If HB 87 is implemented, these members will be harmed because of the provision prohibiting the acceptance of matriculas for official purposes. This will greatly restrict the ability of GLAHR members to conduct basic daily tasks.

17. We have also seen an increase in anti-immigrant sentiment targeted at GLAHR as an organization since the passage of HB 87. For example, we have received calls demanding that we stop helping the immigrant community or receiving intake from undocumented individuals.

18. Other core functions of our organization are also directly affected by HB 87.

We currently hold workshops or forums for which we provide transportation without inquiring into the immigration status of the participants. For example, we went to Virginia a couple of weeks ago for training on how grassroots communities should organize and work together. We rented a van and invited members of the community without inquiring about their immigration status. While providing these functions, our drivers do occasionally drive over the speed limit. Under HB 87, the individual drivers and GLAHR can be criminally liable for transporting undocumented immigrants. We are likely to provide these services again in the future and thus would face serious problems under HB 87.

19. By receiving complaints and serving as mediators for the rights of immigrants, GLAHR often assists individuals to remain in the state. After receiving a complaint or requesting documents, we write demand letters and contact employers and detention centers. We work to solve the problems that our members are facing, regardless of their immigration status. In case they need a lawyer, we tell them where to go or where to look. Under HB 87, these vital functions of GLAHR –to serve our members– would be

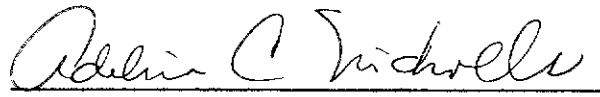


labeled harboring and assisting individuals to remain in the state of Georgia and we would be criminally liable.

20. Also, in the past we have helped with the Dreamers' Conference by providing a venue where they could meet. Because these individuals do not have the proper documentation under HB 87 and because we are likely to help them in the future, GLAHR could be held criminally liable for providing a meeting space for these students.
21. I am very afraid for myself as well. I fear that I will be detained at any moment based on my Latina appearance even though I possess a valid Georgia's driver's license. I do not carry my passport around and I refuse to do so for my safety. In America, one should not have to carry their papers in order to be treated with respect by law enforcement officers. But HB 87 allows any officer to treat me as a second-class person even though I am a U.S. citizen. They may claim, as they have done with other immigrants, that my documents are falsified. I have concerns about my safety in my own house because of the work I do and because of the growing anti-immigrant sentiment in Georgia following the passage of HB 87. I live alone and these bills have increased the hatred towards immigrants, making us the scapegoat for the economic problems which we now face.

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

EXECUTED this 7 day of June, 2011 in Atlanta, GA.

A handwritten signature in cursive script that reads "Adelina C. Nicholls". The signature is written in black ink and is positioned above a horizontal line.

Adelina C. Nicholls