

EXHIBIT 23

Declaration of Mohammad Abdollahi Ali-Beik

I, Mohammad Abdollahi Ali-Beik, 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. My name is Mohammad Abdollahi Ali-Beik, and I am a co-founder of an organization called DreamActivist.org. DreamActivist.org is a multicultural, migrant-youth led movement to pass the DREAM Act, also known as the Development, Relief, and Education for Alien Minors Act.

2. The DREAM Act is a bipartisan bill that seeks to address the situation faced by many young students who were brought to the United States as young infants. Under the most recent version of the DREAM Act, students with good moral character who came to the United States at age 15 or younger at least five years before the date of the legislation's enactment would qualify for "conditional permanent resident status" upon acceptance to college, graduation from a U.S. high school, or being awarded a GED in the United States or have served in the armed forces.

3. I currently live in Atlanta, Georgia. I was born in Iran. I came to the United States when I was about three years old with my parents who immigrated here to study. I have been living in the United States for the past twenty-two years. I am a DREAM Act student.

4. DreamActivist.org is a national organization covering ten regions across the country. Georgia is located in region four along with Alabama, Florida, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. We provide campaign support to DREAM Act students facing removal from the United States in Georgia and all across the country. As a co-founder, I take part in planning events which house undocumented students in houses within the

State of Georgia and/or provide transportation to undocumented students with and without deferred action grants. Under HB 87, these actions could be considered assisting, transporting, and harboring undocumented students in Georgia, which would make me liable for providing assistance to DREAM Act students.

5. We are also a part of another DREAM Act group called National Immigrant Youth Alliance (“NIYA”). I am one of the original co-founders of NIYA.

6. NIYA is an undocumented youth-led network of grassroots organizations, campus-based student groups, and individuals committed to equality for all immigrant youth, regardless of their legal status. NIYA is based in Georgia and provides on-line campaign support around DREAM Act related-issues. In March 2011, NIYA and DreamActivist.org organized a local conference in Georgia to bring together DREAM Act students fighting for immigration reform. Under HB 87, organizing such conferences would be deemed illegal.

7. We rent a house in Georgia to house out-of-state DREAM Act students for the summer. Many of these DREAM Act students are invited to come to Georgia to exchange experiences around organizing and mobilizing for the DREAM Act.

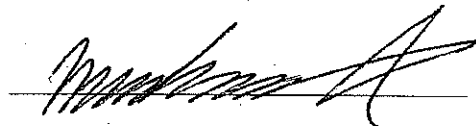
8. DreamActivist.org is a membership based organization with DREAM Act students who have been granted deferred action all over the country, including Georgia. Deferred action is a discretionary decision by Immigration and Customs Enforcement not to arrest or deport a person for immigration purposes. Deferred action is often granted for one year time periods, but can be renewed. However, the temporary and indefinite nature of deferred action means that a DREAM Act student granted deferred action would not be automatically eligible to obtain identity documents in Georgia, and such students often spend months out of each year with no identification while they wait for new documentation to prove that the federal

government has extended their deferred action status. There are no ICE – issued cards or documents for deferred action cases. Sometimes ICE does not provide letters indicating that a person was granted deferred action. DREAM Act students with deferred action would be targeted under HB 87 even though they are permitted to remain in the United States for a specific period of time.

9. Georgia members of DreamActivist.org may also have a private immigration bill introduced by a local Senator or House of Representative preventing their removal from the United States. Upon issuance of a private bill, a DREAM Act student's removal is delayed at least until the end of the congressional session. A DREAM Act student with a private bill introduced may not have proof that the bill was introduced or an officer may be confused as to whether a DREAM Act student with a private bill can remain in the United States. Under HB 87, Georgia DREAM Act students with a private bill introduced but not passed in either the House or Senate may be targeted and arrested under the law.

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

EXECUTED this 6th day of June, 2011 in Atlanta, Georgia.



Mohammad Abdollahi Ali-Beik