

# EXHIBIT 25

## DECLARATION OF HARRIS RAYNOR

I, Harris Raynor, hereby declare:

1. I make this declaration based on my own personal knowledge and, if called to testify, could and would do so competently as follows.
2. I am the Regional Director of the Southern Regional Joint Board of Workers United (“Joint Board”), which is based out of Union City, Georgia. I am also a Vice President of Workers United, which, like the Joint Board, is a labor union and an affiliate of the Service Employees International United (“SEIU”).
3. Joint Board represents approximately 4,000 workers in Georgia. Over 15 percent of Joint Board’s Georgia membership is Latino, including U.S. citizens and lawful immigrants. The primary mission of Joint Board is to organize, represent, and empower employees in Georgia. In addition, Joint Board works in partnership with SEIU and other groups to combat discrimination and mobilize for immigration reform at the national level.
4. If HB 87 is permitted to take effect, it will impose direct harm to Joint Board’s core mission and representational obligations by subjecting Joint Board’s members to unlawful questioning, arrest, and detention by state and

local law enforcement officers. . This will cause hardship for members of Joint Board.

5. In addition, Joint Board will be harmed if HB 87 is implemented because its members and potential members may refrain from exercising their rights to attend rallies, demonstrations, and union meetings or to engage in leafleting or other traditional labor activities because of the possibility of being stopped by police under HB 87.
6. Members have already told the Joint Board that they have faced additional police scrutiny and questioning since HB 87 was passed. They believe this additional police scrutiny was based solely on their ethnic appearance and/or English speaking ability and was a direct result of the passage of HB 87.
7. This discriminatory treatment by law enforcement will significantly impede the ability of the Joint Board to protect its current members and to organize new members. Some members of Joint Board lack one of the documents listed in HB 87 as allowing law enforcement to establish identity of stopped individuals or do not regularly carry these documents with them when traveling in or through the state. Without these documents, the Joint Board's members may be subjected to lengthy detentions and potentially arrests while police officers investigate their immigration status under HB 87.

8. Joint Board will also be harmed if HB 87 is implemented because employers in the state may refrain from hiring members and potential members of the Joint Board that they believe look or sound “foreign” out of a fear that they will be subject to the increased liability under HB 87. This will seriously impact the ability of the Joint Board to recruit new members.
9. The Joint Board regularly provides transportation to members seeking to attend union meetings or other events organized by the Joint Board. The Joint Board does not inquire into the immigration status of the individuals for whom it provides transportation. HB 87’s provisions that criminalize individuals who transport undocumented immigrants will have a chilling effect on the Joint Board’s efforts to provide members with rides to these events. The Joint Board will have a more difficult time organizing transportation to these key union activities because people will be reluctant to associate with someone whose racial/ethnic appearance might result in getting the driver stopped for a minor traffic offense leading to further policy scrutiny and possible criminal prosecution under the law.
10. In addition, if HB 87 is implemented, Joint Board will need to spend significant new time educating members and potential members about the

law. This will divert the Joint Board's resources from other core organizational priorities.

11. The Joint Board routinely negotiates Collective Bargaining Agreements with employers. Almost universally these Agreements contain an article entitled, "Ethnic Diversity and Cultural Issues." This article covers issues around communication in various languages regarding health and safety, discipline, and other workplace issues. It also covers time off to deal with citizenship or immigration status matters and what documentation is requested by the employer. The implementation of HB 87 will require additional time to renegotiate this article to take into account the affects of the statute as well as its requirements of employers. For example, if Joint Board members are subject to increased stops and interrogations by local police officers regarding their immigration status, they may need more time off to deal with immigration status matters that arise.

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12. The Joint Board joins this lawsuit to preserve its ability to organize new members and to protect the rights and interests of its members and prospective members.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th date of June, 2011 in Union City, Georgia

A handwritten signature in cursive script, appearing to read "Harris L. Raynor", is written over a horizontal line. The signature is fluid and stylized, with a large loop at the end.

Harris L. Raynor