

# EXHIBIT 7

## **DECLARATION OF EVERITT HOWE**

I, Everitt Howe, 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 65 years old, and I was born in Coral Gables, Florida. I am a U.S. citizen and have been a resident of Georgia since 1986.
2. I retired from the U.S. Air Force as Lieutenant Colonel in 1989. Subsequently, I worked for Pan American Airlines until 1991, and then I worked for Lockheed-Martin from 1992 to 2005.
3. I was the Vice President of the Fulton County chapter for Atlantans Building Leadership for Empowerment (“ABLE”), an interdenominational social justice organization composed of 27 congregations and organizations. In this role, I represent my church, St. Jude’s Catholic Church, located in the Sandy Springs neighborhood. Our St. Jude ABLE group has organized and led English language classes for 11 years now.
4. I also serve as a caseworker in a community service program at my church, primarily serving residents in the area covered by the 30328 zip code and a part of the 30350 zip code. The program offers a variety of

services, including providing advice on legal or tax matters, food support, and direct financial aid to families and individuals in financial hardship. We serve about 100 families a month through this program. We do not inquire into the immigration status of the individuals we serve, but our clients include some undocumented immigrants.

5. As part of my involvement in the program, I regularly accompany and drive families and individuals who may be undocumented immigrants to hospital visits or other appointments. For example, I have been driving an undocumented young man who is suffering from leukemia to the Emory Hospital in Decatur for his cancer treatment once a week for the past four months.
6. I have also provided assistance to and regularly driven a family with mixed immigration status for the past eight months. The family is composed of the parents who are undocumented immigrants and their 16-year-old daughter who is a U.S. citizen. The father suffers from a kidney failure, and needs regular dialysis and medical care. I have driven him to the traffic court in the past and paid a large part of his fines in order to prevent his incarceration and allow him to continue to work and support his family. I have also helped the daughter obtain her Georgia learner's

permit, both by driving her and her family to the Department of Driver Services and providing driving instruction.

7. In the course of these trips, I have accidentally run a red light on one occasion. I have also had some issues with an intermittent tail light on my car, and it is possible that I may be stopped in the future for minor traffic violations such as a malfunctioning tail light while I am driving with my clients. I fear that under HB 87, I could be found criminally liable for these activities.
8. I also teach English language classes at my church. We do not inquire into immigration status for these classes. These classes used to be a thriving part of our ministry and used to have an attendance of about 100 students a week. However, there was a dramatic decrease in attendance this year; the number dwindled from about 25 to about 12 students at present. This is an average of about 2-3 students for each of our 5 levels of classes, and we may have to cancel the classes altogether as a result. The decline in attendance is directly attributable to people's fear around HB 87. I know this because my students have told me so.
9. Because my church offers these English language classes as well as masses in Spanish and Portuguese, we have been accused of wrongdoing

or inappropriately helping immigrants. For example, after SB 350 became law, we provided information to our students about its effects during class time. One of the English language instructors grew upset and quit, with an accusation that we were encouraging undocumented immigrants to live here.

10. Several of my clients or acquaintances have also recently decided to leave Georgia as a result of HB 87. A girl who was hoping to pursue medical studies here has now decided to move with her family to Brazil because of the general atmosphere of hate and fear created by the law. Another couple I know has decided to move back to Honduras for similar reasons even though the husband is a U.S. citizen and the wife is a documented immigrant.

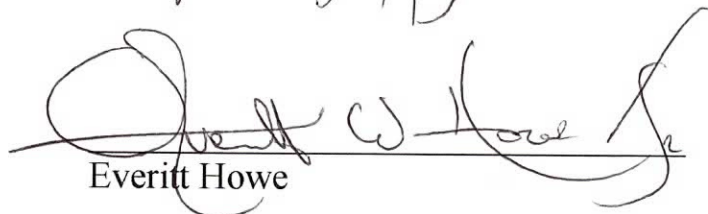
11. It is not just the undocumented immigrants who are feeling intimidated as a result of HB 87. A few days ago, I forgot to take my wallet and my driver's license with me when I left my house. My car broke down on I-285, and I pulled over to the side of the highway. A police officer stopped to ask if I needed assistance. I said I had AAA on the way and he said ok. Even though no negative incident occurred, I felt nervous during the encounter because I was wearing a t-shirt which read "We are all

undocumented,” produced by Georgia Detention Watch. I felt relieved that he did not ask to see my driver’s license since I did not have it with me. If HB 87 had been in effect when this happened, I could have been detained and questioned simply because I did not have in my possession one of the documents the law requires.

12. I am deeply disturbed by HB 87 in its entirety, that it fosters an intentionally intimidating, inhumane, and uncertain environment for every individual in Georgia, whether an undocumented immigrant, a U.S. citizen, a law enforcement officer, or an attorney. In addition to specific provisions of the law that may directly impose criminal liability for activities that I have long engaged in legally, I am afraid the vagueness of the law will result in an overzealous enforcement and compliance efforts by confused and scared law enforcement officers and citizens who have to live with an uncertain anxiety of not knowing exactly what may constitute legal and illegal conduct.

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

EXECUTED this 30<sup>th</sup> day of May, 2011 in Spartanburg GA.

  
Everitt Howe