

Linton Joaquin*
 Karen C. Tumlin*
 Shiu-Ming Cheer*
 Melissa S. Keaney*
 NATIONAL IMMIGRATION LAW
 CENTER
 3435 Wilshire Boulevard, Suite 2850
 Los Angeles, California 90010
 Telephone: (213) 639-3900
 Facsimile: (213) 639-3911
 joaquin@nilc.org
 tumlin@nilc.org
 cheer@nilc.org
 keaney@nilc.org

Omar C. Jadwat*
 Andre I. Segura*
 Elora Mukherjee*
 AMERICAN CIVIL LIBERTIES UNION
 FOUNDATION
 125 Broad Street, 18th Floor
 New York, New York 10004
 Telephone: (212) 549-2660
 Facsimile: (212) 549-2654
 ojadwat@aclu.org
 asegura@aclu.org
 emukherjee@aclu.org

Attorneys for Plaintiff

Cecillia D. Wang*
 Katherine Desormeau*
 AMERICAN CIVIL LIBERTIES
 UNION FOUNDATION IMMIGRANTS'
 RIGHTS PROJECT
 39 Drumm Street
 San Francisco, California 94111
 Telephone: (415) 343-0775
 Facsimile: (415) 395-0950
 cwang@aclu.org
 kdesormeau@aclu.org

Darcy M. Goddard (USB No. 13426)
 Esperanza Granados (USB No. 11894)
 AMERICAN CIVIL LIBERTIES
 UNION OF UTAH FOUNDATION, INC.
 355 North 300 West
 Salt Lake City, Utah 84103
 Telephone: (801) 521-9862
 Facsimile: (801) 532-2850
 dgoddard@acluutah.org
 egranados@acluutah.org

Bradley S. Phillips*+
 Munger, Tolles & Olson LLP
 355 South Grand Avenue
 Thirty-Fifth Floor
 Los Angeles, CA 90071-1560
 Telephone: (213) 683-9100
 Facsimile: (213) 687-3702

* Applications for admission *pro hac vice*
 forthcoming

+ Attorneys for all plaintiffs except Service
 Employees International Union, and the
 Workers' United Rocky Mountain Joint
 Board

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF UTAH
 CENTRAL DIVISION**

Utah Coalition of La Raza, et al.,
 Plaintiffs,

v.

Gary R. Herbert, et al.,
 Defendants.

DECLARATION OF ELIANA LARIOS

Case No. 2:11-cv-00401-BCW
 Judge: Brooke C. Wells

Declaration of Eliana Larios

I, Eliana Larios, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows.
2. I was born on October 24, 1980 in Los Angeles, California. My family is Latino and the majority of my friends are Latino.
3. I have lived in Washington state for over three years. Before that, I lived in Salt Lake County, Utah for ten years. I still have many friends and family, including my father, who live in Utah.
4. I have a driver's license issued by the state of Washington.
5. I have maintained a close relationship with my friends and family in Utah and communicate weekly with them. I have been visiting the state of Utah several times each year since 2008 in order to see them. In 2008, I visited more than five times, in 2009 I went three or four times, and in 2010 I went at least three times. One of the reasons that I visited Utah so often is because my father was diagnosed with cancer a few years ago. My sister (who also lives in Washington state) and I visit Utah regularly to see him.
6. This year I had planned to travel to Utah about five times, but I haven't gone yet. If HB 497 is implemented, I will no longer visit Utah as much as I did before. I would only travel to Utah if there is a family emergency. I will no longer go to Utah for vacation. This will affect my immediate family living there because they will not be able to see me as much.

7. The reason I would travel less to Utah if HB 497 is implemented is because it would be inconvenient for me to carry proof of my citizenship. The only proof I have of my U.S. citizenship is my birth certificate. I do not have a passport. HB 497 is a violation of my rights because I shouldn't have to provide something within the U.S. to show that I am a U.S. citizen. I don't carry my birth certificate with me. I only carry my Washington driver's license, insurance and car registration when I drive. I would never want to carry my birth certificate or Social Security card just to see my dad. I fear losing them or getting them stolen. Documents such as my birth certificate should be kept in a safe place, not taken everywhere. Plus there is the inconvenience of carrying documents I normally wouldn't have to carry in Washington.
8. In addition, I will be afraid to travel to Utah for fear that I will be stopped by the police and asked about my status. I was never afraid to travel to Utah before HB 497 was passed. I am concerned about being racially profiled if HB 497 is implemented. I am worried that I could be stopped because of the way I look. A police officer who sees that I have Latino name and a Washington driver's license might assume that I am undocumented and ask for my immigration documents. The officer may not believe me if I say I am a U.S. citizen and detain or arrest me while he or she checks my immigration status.
9. I have undocumented friends and family living in Utah. I typically travel with them when I am in Utah. HB 497 makes me afraid to travel with them. I don't usually ask people what their immigration status is and I don't want to ask them just to drive someplace with them. I also don't want to face criminal charges for transporting or

smuggling undocumented immigrants. Therefore, if HB 497 if implemented and I ever visit Utah, I would not drive people as much. It would be a huge burden for me to ask people for their immigration status before I drive them. I would rather not drive them at all.

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

EXECUTED this Fourth day of May, 2011 in Salt Lake City, Utah.



Eliana Larios