

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CITY OF EL CENIZO, TEXAS, <i>et al.</i> ;	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 5:17-cv-404-OG
	§	
STATE OF TEXAS, <i>et al.</i> ,	§	
Defendants.	§	

DECLARATION OF BENJAMIN E. JOHNSON

Pursuant to 28 U.S.C. § 1746, I, Benjamin E. Johnson, declare the following:

1. My name is Benjamin E. Johnson and I am over the age of eighteen years. I have personal knowledge of and could testify in Court concerning the following statements of fact.

2. I am the Executive Director of the American Immigration Lawyers Association (AILA). AILA is the national association of more than 15,000 attorneys and law professors who practice and teach immigration law. AILA member attorneys represent U.S. families seeking permanent residence for close family members, as well as U.S. businesses seeking talent from the global marketplace. AILA members also represent foreign students, entertainers, athletes, and asylum seekers, often on a pro bono basis. Founded in 1946, AILA is a nonpartisan, not-for-profit organization that provides continuing legal education, information, professional services, and expertise through its 39 chapters and over 50 national committees.

3. AILA's mission is to promote justice and advocate fair and reasonable immigration law and policy. This is what we and our 15,000 members do, day in and day out. As part of our service to members, AILA holds an annual conference of its members, which is attended by thousands of immigration law practitioners and others in the immigration law community, who are often accompanied by family and friends. The AILA Annual Conference takes place over the course of three and a half days and is the largest yearly gathering of immigration lawyers and legal professionals in the United States. In 2010, AILA had committed to hold its 2018 annual conference in Grapevine, Texas. AILA anticipated that over 3,000 individuals would attend the conference.

4. However, because of the enactment of SB-4, the AILA Board of Governors has voted to move the Association's 2018 annual conference from Grapevine, Texas, to another state. The AILA Board of Governors concluded that the provisions of SB-4 are contrary to AILA's mission and principles, and that enforcement of SB-4 could potentially subject AILA members, their families, and their guests to unreasonable questioning, detention, and possible arrest. It is no small matter to cancel the venue for a professional conference with more than 3,000 attendees. In the end, the AILA Board decided it could not ask AILA members, and in many cases their families, to attend a conference in the state which has passed SB-4 into law.

5. SB-4 serves no legitimate purpose and undermines our country's principles of fairness, due process, and equal treatment under the law. By championing this bill and signing it into law, Governor Abbott has endorsed the stereotyping, scapegoating, and targeting of immigrants and the communities that welcome them, rather than acknowledging the immense benefits that immigrants bring to our nation and the shared prosperity which follows.

6. AILA condemned SB-4 after its enactment because the law encourages unacceptable profiling of people based on perceived immigration status and will undermine the public safety of local communities. It will also force law enforcement officers in Texas to honor federal Immigration and Customs Enforcement (ICE) detainers, which courts have already concluded put local jurisdictions at risk of legal liability for violating the Constitution. The Texas bill is a direct attack on local police and sheriff's authority to keep their own communities safe by imposing stiff penalties, including jail time and removal from office if a local official refuses to honor a detainer or to participate in federal immigration enforcement.

7. AILA reserved its conference location in November, 2010. The contract with the conference hotel includes a substantial cancellation fee as provided for under the contract with the conference hotel. However, Texas' SB-4 is unjust, unfair and unreasonable. Thus, under these extraordinary circumstances, AILA made the decision that it cannot, in good conscience, bring its premier event to the State of Texas.

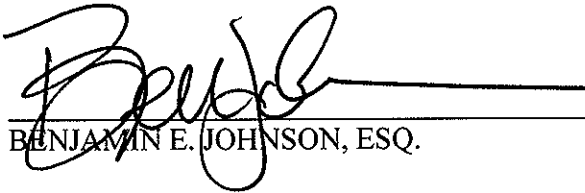
8. In previous years, the AILA conference has made substantial economic contributions to the host communities. For example, we estimate that attendees spend in the range of \$1,000.00 to \$1,500.00 for hotels, food and entertainment, and local transportation, during the time attending the conference. With an attendance of 3,000 registrants, the AILA conference brings approximately \$3-\$5 million to the local economy.

9. If SB-4 takes effect in Texas, AILA will most likely continue to refrain from holding future Annual Conferences in Texas. We cannot subject our members, attendees, and their families and guests, nor can we countenance the communities our members serve being subjected to the possibility of unreasonable detention or police harassment, simply because a person might

be perceived to be an undocumented immigrant. Further, we do not want to facilitate the continued enforcement of discriminatory legislation by providing an economic benefit to the State.

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed in Washington, D.C., on the 15th day of June, 2017.


BENJAMIN E. JOHNSON, ESQ.