

Exhibit 16

Karen Tumlin Declaration

Declaration of Karen C. Tumlin

I, Karen C. Tumlin, state as follows:

1. I am over the age of 18 years.
2. I am the Managing Attorney at the National Immigration Law Center (“NILC”) in Los Angeles, California. I am an attorney of record for plaintiffs in the matter of *Central Alabama Fair Housing Center (“CAFHC”) v. Magee*, No. 11-982.
3. In my role as Managing Attorney at the NILC, I supervise the work of other attorneys and staff who answer a telephone hotline for individuals to report problems due to Alabama’s HB 56. NILC staff regularly answers this hotline on Mondays.
4. On Monday, November 28, 2011, several of our staff and attorneys took phone calls from individuals who were denied the ability to pay registration fees for their manufactured homes in Alabama due to their inability to prove their lawful immigration status by presenting certain, specified documents.
5. All told, we took calls from five separate individuals who were not permitted to pay registration fees on their manufactured homes by officials on November 28, 2011, because they could not provide sufficient proof of their immigration status. These individuals were denied the ability to pay manufactured home registration fees in the following locations: Bessemer (Jefferson County); Birmingham (Jefferson County), Clanton (Chilton County); and Columbiana (Shelby County).
6. The individual who was denied the ability to pay his registration fee in Bessemer was told by an official that he needed to show a U.S. passport or Alabama driver’s license in order to pay the fees and renew his decal.

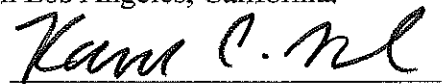
7. Two different individuals called NILC reporting problems with paying their registration fees in Birmingham. One of these individuals was told by an official that he needed a valid Alabama driver's license in order to pay the registration fee. The other individual was told he needed to provide proof of lawful immigration status.

8. The individual denied the ability to pay the manufactured home registration fee in Clanton was told by an official that he needed an Alabama driver's license in order to pay the fee.

9. The individual who called regarding Columbiana was told by an official that he would have to pay a tax before he could renew his manufactured home registration, and that he could not pay the tax unless he produced a state or U.S. photo ID.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 29th day of November, 2011 in Los Angeles, California.


Karen C. Tumlin