

EXHIBIT

4

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA and the OKLAHOMA STATE CHAMBER OF COMMERCE AND ASSOCIATED INDUSTRIES, et al., Plaintiffs, v. BRAD HENRY, in his official capacity as Governor of the State of Oklahoma, W.A. DREW EDMONDSON, in his official capacity as Attorney General of the State of Oklahoma, et al., Defendants.

No. _____

DECLARATION OF ROY H. WILLIAMS

I, Roy H. Williams, state and declare the following:

- 1. I am over the age of 18 and am a citizen of the United States. The statements contained in this declaration are my own, and are based on personal knowledge and on information I gained in the course of my business.
2. I am the President and Chief Executive Officer of the Greater Oklahoma City Chamber of Commerce.
3. The Greater Oklahoma City Chamber is located at 123 Park Avenue, Oklahoma City, Oklahoma 73102.
4. The Greater Oklahoma City Chamber promotes business, commerce and quality job growth in the Central Oklahoma City Region, and represents businesses in diverse fields, including manufacturing, retail, servicing, wholesale, financial, energy, construction, trades,

utilities, telecommunications, and transportation. The Greater Oklahoma City Chamber, and its members, do not support the employment of illegal immigrants. We are a member of the Chamber of Commerce of the United States of America and the State Chamber of Oklahoma.

5. The Greater Oklahoma City Chamber's purpose is to advocate for the interests of its members, including before government agencies, the legislature, and the courts.

6. The Greater Oklahoma City Chamber has approximately 4,500 members in Oklahoma.

7. Several of the Greater Oklahoma City Chamber's members have contracts with state and local governments and other public entities in Oklahoma. Many of our members also employ individual independent contractors in the state.

8. It is my understanding that members of the Greater Oklahoma City Chamber, as well as the Greater Oklahoma City Chamber itself as an employer, will be subject to, and harmed by, the Oklahoma Taxpayer and Citizen Protection Act of 2007.

9. Members of the Greater Oklahoma City Chamber will be subject to, and harmed by, the section of Oklahoma's new law that requires all businesses that have contracts for the performance of services with public entities in the State to verify the immigration status of all new employees using the new "Status Verification System," which I understand is effectively limited to the "Basic Pilot Program." Our members will be required to use this system instead of relying on the I-9 Form process required by federal law.

10. I understand that the Basic Pilot Program is an experimental and voluntary federal database. Any of our members with public contracts for the performance of services that do not participate in the Basic Pilot Program will therefore be automatically debarred from contracts with public entities once Oklahoma's law goes into effect. They will also be required to forfeit contracts already won, and cannot bid on any future contracts with public entities.

11. We have members that are dependent on public contracts for their businesses. Debarment from these contracts would cause them serious and irreparable harm.

12. There are good reasons why our members should not be forced to use the experimental and voluntary Basic Pilot Program. I am aware, for example, that the Basic Pilot Program does not contain a complete and correct list of all legal workers and is prone to errors. It also restricts the pool of legal workers that can be lawfully hired by our members.

13. The labor market in Oklahoma is very tight. If our members cannot hire from among all legal workers, their ability to fill their workforces will be impaired and they will suffer harm.

14. Our members will also be harmed because the Basic Pilot system does not actually confirm that an employee is illegal. Rather, the Program requires businesses to wait for weeks while any employee that is not confirmed by the system attempts to sort out problems or discrepancies in the database (which employees are entitled to do under federal law). During this time, our members will be required to incur substantial expenses training and orienting new employees, without being able to confirm whether they are actually authorized to work. None of these expenses can be recovered.

15. Our members will also suffer harm when new employees are required to divert their time, attention, and work-hours to sorting out problems with the database, rather than devoting their full attention to their jobs.

16. Our members will also incur expenses retraining their employees and reorienting their verification procedures to use Basic Pilot, and using it and complying with its rules on an ongoing basis, rather than continuing to use the I-9 Form process with which they have been complying for years. None of these expenses can be recovered from the State if the law is found unconstitutional.

17. Members of the Greater Oklahoma City Chamber will also be subject to, and harmed by, the provision of Oklahoma's law that requires them to verify the work authorization of all individual independent contractors, or be subject to severe adverse tax consequences that include withholding the highest marginal rate of taxes from the contractors' pay, or paying a tax penalty in the same amount.

18. I understand that federal law does not contemplate businesses verifying the work authorization of independent contractors. Therefore, to the extent our members use the services of individual independent contractors and do not verify work authorization since this is not required under federal law, they will be effectively required to suffer the adverse tax consequences I mentioned above.

19. Both of these tax provisions will harm our members.

20. The withholding requirement will decrease the take-home pay of individual independent contractors and will make it more expensive for them to do business in Oklahoma. This will harm the ability of our members to find and hire qualified individual independent contractors willing to work in this State. It is my understanding that many of our members rely on these contractors to perform critical services for their businesses, and will be harmed if it becomes more difficult to hire them.

21. Our members could only avoid this result by paying individual independent contractors more money to offset the new state withholding requirements. This will cost our members significant sums of money and result in decreased profits, and will make it more expensive for them to do business with individual independent contractors. This will harm our members, both because of lost profits and as an impediment to their ability to hire individual independent contractors. None of these costs can be recovered.

22. The only remaining option under Oklahoma's law is for our members to pay a tax penalty in the amount of the lost withholding. This option will likewise cause our members harm: it will make it more expensive to do business with individual independent contractors, will cost our members money in the form of higher overhead expenses and decreased profits, and will be an impediment to our members' ability to use the services of individual independent contractors. Again, none of these costs can be recovered.

23. Our members who use the services of individual independent contractors will be required to hire new employees or to assign new tasks to existing employees to calculate and to remit the new withholding amounts to the taxing authorities, or calculate and remit the tax penalty. The costs of these new employees or the cost of the use of time by existing employees cannot be recovered.

24. Members of the Greater Oklahoma City Chamber will also be subject to, and harmed by, the section of Oklahoma's law that creates a claim for employment discrimination against employers that discharge a legal employee while retaining an employee the employer knew or "should have known" was illegal.

25. It is my belief that the Greater Oklahoma City Chamber's members comply with federal law and do not knowingly hire illegal workers. But Oklahoma's law (unlike federal law) allows our members to be found liable even if they do not know an employee is illegal. It also does nothing to address the very real problem of unfounded accusations by ex-employees, which can cause serious monetary and reputational harm to businesses that are linked, even wrongly and unfairly, with hiring illegal immigrants.

26. Our members will be required to divert profits and set aside reserves, or at least purchase additional litigation insurance, to account for and appropriately manage the additional risk of

investigations and suits under this law—particularly since employers can be liable without having knowingly done anything wrong, and will encounter enormous pressure to settle baseless accusations to avoid the damage to their businesses and reputations that would be caused by being publicly identified as suspected of employing illegal aliens. This will harm our members, and none of these expenses can be recovered.

27. There is no “safe harbor” from liability that will not likewise cause our members harm. I understand that federal law only makes a business liable for knowingly employing an illegal alien, and businesses have a safe harbor if they comply in good faith with the federal I-9 Form requirements. Oklahoma’s law does not contain these provisions. Instead, it makes an employer liable if it is alleged that the employer “should have known” it employed an illegal alien, and forces businesses to adopt the new “Status Verification System” as the only way to avoid possible investigation and suit.

28. Since businesses can be found liable under Oklahoma’s law whether or not they knowingly hire an illegal alien, and face enormous harms even if they are wrongly accused of hiring illegal aliens, they will be effectively forced to use the “Status Verification System” to avoid the risks to their business and the risk-management costs I mentioned above. As I explained above, there are good reasons why our members should not be forced to use the Status Verification System, and our members will suffer harm if they are forced to do so.

29. I also wish to state that, in addition to harm to its members, the Greater Oklahoma City Chamber will suffer all the aforementioned harms as an employer in the State of Oklahoma.

30. The Greater Oklahoma City Chamber has over 60 employees. We have verified their work authorization status using the federal I-9 Form process. We do not participate in the Basic Pilot Program.

31. Because we have contracts for the performance of services with public entities in Oklahoma (including the City of Oklahoma City and Oklahoma County), we will be debarred from these public contracts and will be unable to bid on future contracts once the law goes into force. We will be harmed if we are debarred from these contracts.

32. For the same reasons as our members, we will suffer harm as an employer if we are forced to use Oklahoma's new "Status Verification System" to avoid being debarred from public contracts for the performance of services.

33. As an employer, we will also be subject to the new claim for employment discrimination by former employees.

34. For the same reasons as our members, we will suffer harm as an employer subject to this new claim.

35. The Greater Oklahoma City Chamber also uses the services of individual independent contractors. The use of individual independent contractors is crucial to our business. On an annual basis, the Greater Oklahoma City Chamber has issued 1099 tax forms to more than 150 individuals who have provided services to the Greater Oklahoma City Chamber, and the Chamber anticipates doing so again for calendar years 2007 and 2008.

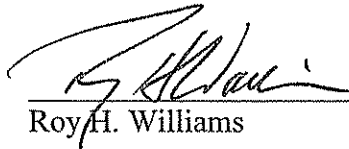
36. For the same reasons as our members, we will suffer harm insofar as we will be forced to incur the adverse tax consequences that the law imposes on businesses that use the services of individual independent contractors.

37. The Greater Oklahoma City Chamber complies with federal law, does not knowingly hire illegal aliens, and does not support businesses that violate federal law. It is the position of the Greater Oklahoma City Chamber that the federal government is responsible for solving the

illegal immigration problem, and the Greater Oklahoma City Chamber supports a national solution that is fair to law-abiding businesses.

38. The Greater Oklahoma City Chamber's mission is to promote business, commerce and quality job growth in the Central Oklahoma City Region. The Oklahoma Citizen and Taxpayer Protection Act of 2007 will make it much harder to fulfill this mission.

Executed on the 25th day of January, 2008.



Roy H. Williams