

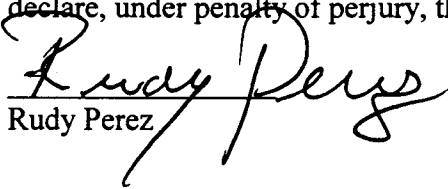
**Declaration of Rudy Perez**

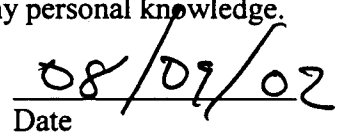
I, Rudy Perez, hereby state and declare the following:

1. I am over the age of 18, Hispanic, and a United States Citizen. My date of birth is April 06, 1946. My mailing address is 3468 Edgerock, El Paso, TX 79935.
2. I have been a farmer for 10 years. I farmed approximately 500 acres of farmland, and I grew cotton, hay, oat and alfalfa.
3. In 1990, 1992, 1993, 1994, 1996, 1997, 1998 and 1999, I applied for FSA operating loans from the El Paso and Fort Stockton County Farm Services Agency ("FSA"). In all those years, I was only approved for three FSA loans. On the occasions when I did receive loans, they were paid out late, and it was for less than the requested amount. I was always required to provide excessive collateral to secure the loans, and they want me to provide collateral that did not belong to me. When I was denied funding, it was for lack of farming experience, even though I had given the FSA County committee written documentation that I had completed farm management courses. I was also denied funding for inadequate farming plans, but these plans could have been modified.
4. In 1995, Mr. William McAnally became the sole loan officer in the El Paso and Fort Stockton FSA offices. Mr. McAnally told me that the county committee refused to certify me for an FSA loan because I did not have the necessary farming experience. Previously, I had met with the county committee regarding that issue. Mr. McAnally continued to harass me about training even after I completed a training course. I found Mr. McAnally to be extremely insensitive and he always required excessive paperwork to process my loans. I believe that Mr. McAnally was constantly setting me up to fail.
5. In late September 2000, Mr. McAnally accelerated my FSA operating loan for failure to pay my property taxes. In early 2001, I asked for, and was refused, additional time to pay for the farm equipment which was the collateral for the FSA farm loan. In early May 2001, the FSA exercised its lien on my farm equipment and held an auction without notifying me, and while I was not present at my farm. I learned of the auction and sale of my equipment only after the sale had occurred.
6. I wrote repeatedly in 2001 to the USDA Office of Civil Rights in Washington, DC complaining of discrimination and mistreatment by Mr. McAnally and the El Paso County FSA office. After three such letters, I received a letter from John Fuston, the FSA State Executive Director, on June 7, 2001, telling me that the auction of my equipment was valid and that my civil rights complaints were closed. However, at that time, I was never advised by the USDA Office of Civil Rights in Washington, DC that my complaints had been closed. I also wrote complaint letters to Mr. McAnally and to John Fuston, to no avail.

7. The El Paso FSA office foreclosed on my farm equipment, despite my pending civil rights complaint.
8. I believe that Mr. McAnally and the El Paso County FSA office continually discriminated against me while I participated in the farm loan programs and that they accelerated my loan as a way to eliminate me from FSA programs. The FSA state office also claimed that the FSA local office over paid me several thousand dollars worth of disaster relief benefits in 1993-1994.
9. I believe I was discriminated against by Mr. McAnally and the USDA because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of 9 (nine) numbered paragraphs, and declare, under penalty of perjury, that it is true and correct to the best of my personal knowledge.

  
Rudy Perez

  
Date