

Exhibit 27

Declaration of Norma V. Reyes

I, Norma V. Reyes, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is September 9, 1963. My mailing address is 5917 W. Pueblo del Sol, Weslaco, TX. 78596. I am making this declaration on behalf of my husband, Manuel R. Reyes and myself.

2. Both my husband and I are from farming families. We worked on farms growing up and became familiar with all aspects of farming.

3. For many years we farmed land which we leased from the Parks and Wildlife Service. We had 1500 to 2000 acres on which we grew cotton, grain, watermelon, cantaloupe, squash, cabbage and corn. During the first six to seven years that we farmed we borrowed money from the bank each year for our crops. We were always able to pay this money back after the harvest. We had paid off the amounts owed on most of our equipment.

4. In approximately 1992 or 1993 we decided we wanted to expand our operations. The bank indicated it would only approve a loan for more money if we received a guarantee from Farmers Home Administration (FmHA). There was a great deal of paperwork involved in this application. Each time I believed the application was completed I was told I needed to submit another document. When I went to the office to seek assistance I would have to wait the whole day in order to get to see someone. Ultimately we were successful in obtaining the loan. That year we lost our crops. We paid off the FmHA loan with insurance money.

5. The following year we again applied for a guarantee from Farm Service Agency (FSA). A woman from FmHA named Noellia was extremely helpful in the preparation of our application. (I do not know her last name). Our application was denied. I called the office to complain. Mr. Dykas, who was the person I was dealing with at the FmHA office, said the application was not approved because we had just been lucky the year before. I contacted Noellia after we received word that we were denied. Noellia expressed great surprise that we were denied. She indicated that there were several Anglo farmers who were in bankruptcy yet their applications were approved. Because of the denial of the application we were forced into bankruptcy and lost our farm. We no longer make a living as farmers.

6. In 1993 or 1994, I contacted my U.S. Congressman, Kika De La Garza, and complained to him about how unfair I thought this situation was. He indicated he would help. I have never heard back from him.

7. I believe the F~~B~~^WA discriminated against my husband and myself in denying our application for a guaranteed loan because we are Hispanic. I repeatedly heard throughout this ordeal that people were not helping the Mexican-Americans. I also continually heard that it was only Hispanic farmers who were not being helped and only Hispanic farmers who were getting the run-a-round.

I have reviewed the foregoing Declaration, consisting of seven (7) numbered paragraphs, and declare, under penalty of perjury, that it is true and correct to the best of my personal knowledge.

Norma V. Reyes
Norma V. Reyes

April 1, 2002
Date

Exhibit 28

Declaration of Stella Garza

I, Stella Garza, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My birth date is November 11, 1960. My mailing address is P.O. Box 326, Sundown, Texas, 79372.
2. My ex-husband, Adam Garza, Jr and I farmed approximately 8 years together. He is a third generation farmer.
3. We started out farming about 200 acres of cotton in Hockley County. Over the years we rented and purchased additional land and in 1998 (the last year we farmed), we were farming approximately 520 acres.
4. We first applied for a FSA operating loan from the Hockley County USDA office in 1990. At that time, we were dealing with Bobby Sparkman. We were rejected for a FSA operating loan.
5. We contacted Bill Arens, who has served as a farmers advocate to many of the Hispanic farmers in my community. Mr. Arens has a vast knowledge of the USDA/FSA regulations and helped me to appeal my loan rejection. The appeal hearing was held in August of 1990. FSA's decision to deny our loan was reversed and we received our loan funds after that.
6. In 1991 we were again turned down for a FSA operating loan. We appealed in April of 1991. Again the FSA's decision to deny me was overturned and we received our operating loan funds late in the year.
7. The planting season for cotton is April. We did not receive our FSA operating loan money until late in the planting season. Due to not getting funded on time, we were not able to properly plant our cotton crop.
8. Every year from 1990 to 1997, we applied for FSA operating loans. Every year from 1990 to 1997, we were rejected and had to appeal the decisions, or if we were approved, we did not receive our funding until late in season.
9. We always received our FSA loan funds late in the season. Donnie Polk and Mike Hewitt, freinds that Adam grew up with and went to school with that were White/Anglo farmers, always received their FSA operating loan funds earlier than us and before planting season began. The delay in funding our the FSA loan money detrimentally affected our farm. If we could have received fair treatment from the USDA office and gotten our operating loan money on time like everyone else, I believe my farm would have survived.
10. When we received our operating loan funding the money would be placed in a "supervised account". This meant that the USDA monitored exactly where all the funds would be spent. We had to get a check directly for every peice of equipment that we bought and every bill that we paid. They would micro-manage my account and tell us that we were spending too much. USDA refused to release normal income security so that we could feed our family. In March of 1994, Rick Hayter (acting Hockley county supervisor) denied our request for the release of money and we filed an appeal. In April, Mr. Hayter withdrew his decision.

11. Mr. Arens, on our behalf, lodged several complaints regarding our treatment by the USDA.
12. At all times from 1990 to present we were qualified for and should not have been denied FSA operating loans. In our dealings with the USDA office loans were made too late or not at all, and there were always long waits for the appeals and for the loans to be processed. I believe that we were treated unfairly by the USDA office and that if we were White/Anglo farmers, we would not have had to endure all of the trouble that was inflicted upon us.
13. In the end we lost our farm and our marriage ended because of FSA discriminations. I was also made to sign on my husbands notes. Nobody has ever explained or offered debt settlement procedures for FSA. The USDA has now offset money that I desperately needed from the IRS.
14. I believe that I was discriminated against by the USDA because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of (14) fourteen numbered paragraphs, and declare under penalty of perjury that it is true and correct and to the best of my personal knowledge.

Stella Garza
Stella Garza

3-26-02
Date

Exhibit 29

Declaration of Cyril E. Tixier

I, Cyril E. Tixier, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is August 29, 1927. My mailing address is 1516 South Second Street, Tucumcari, New Mexico, 88401.
2. I have been a farmer and rancher for more than fifty years, and have experience in all areas of farm and ranch operations. At one point, I owned and operated a 2,900-acre cattle ranch.
3. ^{C.E.T.} In 19~~99~~⁹⁵ I sought to apply for a \$160,000 farm operating loan from the Tucumcari, New Mexico office of the Farm Service Agency (FSA), or its predecessor Farmers Home Administration (FmHA). I intended to use the loan to help cover unexpected expenses which had arisen in running my cattle ranch.
4. I submitted my loan application in person at the Tucumcari, New Mexico office, and spoke with a loan officer named Mr. Parker. I pointed out that I had worked for the Atomic Energy Commission and the U.S. Customs Service, and had received security clearances. I also showed proof that I had never defaulted on a loan. As collateral, I offered up the 2,900 acres that I owned, my 260 head of cattle, and 1,700 acres of state-leased land.
5. After presenting my application, Mr. Parker said that I could receive a response immediately. Within thirty minutes, Mr. Parker told me that I could not get a loan because my collateral was insufficient, and also because the agency would have to sue me to get their money back.
6. ^{C.E.T.} In 19~~99~~⁹⁵, shortly after being denied, I called the FSA's regional office in Albuquerque, New Mexico to complain about the treatment I had received and to see if I could do anything to fix the problem. The person at the Albuquerque office told me that there was nothing they could do, and also told me not to send them an application because they would also deny my request for a loan.
7. Since I was not able to receive an operating loan from the FSA, I was forced to sell my ranch in 1999.
8. I believe I was qualified for the loan I sought from the FSA, or its predecessor FmHA, and that the agency discriminated against me in processing my loan application on the basis of my national origin.

I have reviewed the foregoing Declaration, consisting of eight (8) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.

Cyril E. Tixier
Cyril E. Tixier

March 28, 2002
Date

Exhibit 30

Declaration of Beatrice Garza and Rodolfo Garza


We, Beatrice Garza and Rodolfo Garza, hereby state and declare the following:

1. We are both over 18 years of age and both U.S. citizens. Beatrice Garza's date of birth is June 24, 1957. Rodolfo Garza's date of birth is March 11, 1948. Our mailing address is 106 North Avenue C, Crystal City, Texas. 78839.
2. We were farmers from 1983 until 1995. Our farm was 39 acres, and we primarily grew spinach as well as onions, peppers, cilantro and sorghum.
3. We went to the Farmers Home Administration (FmHA) in Carrizo Springs, TX on three occasions. We had seen articles, in 1984 and 1986, published in newspapers stating that the USDA had money available for farmers. In addition, we were encouraged to apply by white farmers that we knew who had obtained loans from the USDA without any trouble. These farmers included Charles Carr, Lake Smith, Dorothy Hodges, Warren Wagner and Pat Byrd.
4. Our first visit to the FmHA occurred in 1984. We got an application that we subsequently completed and submitted. We never got a response with respect to that application. I, Beatrice Garza, called the office repeatedly to ask about the status of our application. During one phone call, I reminded the woman of the newspaper article indicating that funds were available. She responded that my husband and I were not qualified for a loan. I was always given the run around. I was told "we will look into it, and then we'll let you know when we have money". Finally, the woman told me that "you've done your part and now you have to wait and don't call us - we'll call you".
5. The second visit to the FmHA took place in 1986. I, Rodolfo Garza, went to the office by myself to pick up an application. I was immediately told to try the bank for a loan. I informed the woman that I did try at the bank, but I was rejected. Only then, did she give me an application. Again, we completed the application and submitted it to the FmHA office. Again, we never got a response with respect to that application. We were concerned about the FmHA's lack of responsiveness to our repeated requests for information; so, I, Beatrice Garza, wrote a letter to the Secretary of Agriculture in 1986 about the repeated loan denials. We never received a response to that letter.
6. The third visit to the FmHA took place in 1992. I, Rodolfo Garza, along

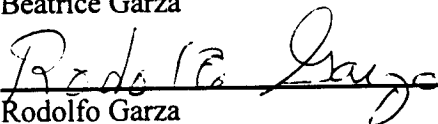
with my father David Garza went to the office to try to pick up an application. The person at the office told us that our farm was too small to qualify and that we would not have enough collateral even if we did qualify. The person went on to say that there was no money available for loans anyway. The overall attitude and demeanor of the FmHA employee was do not bother to apply, because we are not going to give you a loan. I felt discouraged and disheartened, and I left the office without an application.

7. On one of my numerous phone calls to the FmHA to find out the status of our application, I, Beatrice Garza, asked the woman, who I was speaking to, the procedure for complaining about how we were treated by the FmHA. The woman told me that there is no procedure for complaints or appeals. Nonetheless, I did complain to the Secretary of Agriculture in 1986. The Secretary did not respond either orally or in writing.
8. In 1995, we lost our farm. We simply could not keep up with the payments anymore. Our hometown, Crystal City, is known as the "Winter Garden" because the weather is usually warm 290 days a year. Our dream was to own and operate our own spinach farm, but we were never able to realize that dream due to our lack of funding. As a result of the USDA's discriminatory conduct, we have suffered substantial economic losses.
9. Each time we went to the FmHA in Carrizo Springs, TX to apply for a loan, we were qualified for the loan that we sought. We believe that the FmHA discriminated against us because we are Hispanic.

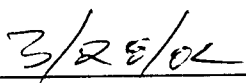
We have reviewed the foregoing Declaration, consisting of nine (9) numbered paragraphs, and declare under penalty that it is true and correct to the best of our personal knowledge.



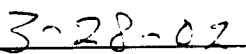
Beatrice Garza



Rodolfo Garza



Date



Date

Exhibit 31

Declaration of Vicky Garza

I, Vicky Garza, hereby state and declare the following:

1. I am over 18 years of age and a U.S. Citizen. My date of birth is January 27, 1964. My mailing address is P.O. Box 37, Sundown, Texas, 79372.
2. My husband Ray Garza grew up on a farm. He has been working on a farm since he was 10 years old. My husband and I farmed on our own for 14 years. Ray is a third generation farmer. I learned farming from my husband and his father and brother.
3. We started farming about 300 acres of cotton in 1985. Over the years we rented and purchased additional land. In 1998, the last year our farm was operational, we owned 425 acres of land and leased approximately another 600 acres of cotton.
4. We first applied for a FmHA operating loan from the Hockley County USDA office in 1990. At that time we were dealing with Bobby Sparkman. We were approved for that loan but did not receive our FmHA operating loan money until late July/ early August.
5. We contacted Bill Arens, who has served as a farmers advocate to many of the Hispanic Farmers in our community. Mr. Arens has a vast knowledge of the CFR regulations and helped us to obtain this first loan. When we were finally approved for this loan it was for an amount less than the original amount we were requesting.
6. The planting season for cotton in my geographical region is April through May. We did not receive our FmHA operating loan money until late in the planting season. If you plant cotton late in the season and there is an early frost, the cotton plants are not strong enough to survive the frost. However, if the cotton is planted on time, the plants will be strong enough to survive an early frost. Due to not getting our FmHA loan on time, we were not able to properly plant our cotton crop.
7. Every year from 1990 to 1998, we applied for FmHA/ FSA operating loans. Every year from 1990 to 1998 the USDA never accepted our original loan application. We were always forced to make changes to our application with the help of Mr. Arens, before the USDA would fund our FmHA/ FSA operating loan and also required to provide

excessive documentation before our loan application would be considered complete. We would apply and be considered complete in January or February and not be funded until July or August. Due to the long wait to receive our FmHA/ FSA operating loans, we were forced to farm on credit and every year we would get further into debt.

8. We were always paid the FmHA/ FSA operating loan money late in the planting season. The delay in paying to us the FmHA/ FSA loan money detrimentally effected our farm. If we just could have received fair treatment from the USDA office and received our FSA operating loan money on time like everyone else, I believe we would still have our farm today.
9. When we received our FmHA/ FSA operating loan funds, we were given a "supervised account". This meant that the USDA monitored everything that we purchased for our farm. We would have to get a check directly from the USDA office for every piece of equipment that we bought for the farm and every bill that needed to be paid. We also had to request funds for everyday family living expenses. We knew of no other non-Hispanic farmer that had a "supervised account".
10. At all times from 1990 to 1998, we were qualified for FmHA/ FSA operating loans. In our dealings with the USDA office our FSA operating loans were made too late in the year and we were forced to farm on credit until our loans came through. We believe that we were treated unfairly by the USDA office and that if we were White/Anglo farmers, we would not have had to endure all of the trouble that was inflicted upon us.
11. Several times in the 1990's, I called the State USDA office to complain about our treatment by our local USDA office. I spoke with Lisa Bourgay. As far as I know, nothing ever came of my complaint. Mr. Arens also made several written complaints on our behalf to our local USDA office.
12. In the end we lost our farm. We would have been successful farmers if the USDA had just been willing to work with us and pay out our FSA operating loans on time. We were always given a loan for less than the amount we requested and we were required to provide excessive collateral in everything we owned in order to secure a loan. The USDA was usually very unhelpful to us, until they found out that Bill Arens was helping us.
13. We believe that we were discriminated against by the USDA because we are Hispanic.

I have reviewed the foregoing Declaration, consisting of (13) thirteen numbered paragraphs, and declare, under penalty of perjury that it is true and correct and to the best of my personal knowledge.

Vicky Garza
Vicky Garza

4-1-02
Date

Exhibit 32

Declaration of Sonja Madera Myers

I, Sonja Madera Myers, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My date of birth is July 22, 1944. My mailing address is 1356 CRS, Clovis, New Mexico 88101.
2. I have been a farmer all my life and have experience in all aspects of farming operations. I currently own a 760-acre farm with my husband on which we grow wheat and sorghum.
3. In the mid-1980s, my husband and I applied to the Farmers Home Administration (FmHA) office in Curry County, New Mexico for a write-down of some of our debt. The supervisor of that office, Tom Hunton, denied our request for a write-down. We then obtained the services of Pete Morrow of the Southwest Farm Advocacy Group, and appealed Mr. Hunton's decision to the national appeals office. The appeals officer overturned Mr. Hunton's decision. With Mr. Morrow's help we reapplied for a debt write-down, but Mr. Hunton also denied this request. Again Mr. Morrow appealed the decision, and again the appeals officer overturned Mr. Hunton's decision. After this appeal, we went to Albuquerque to meet with Winford Riley, a supervisor in the New Mexico State FmHA office. After this meeting with Mr. Riley, Mr. Hunton, using the same figures we had presented on the previous occasions, decided that we were now eligible for a debt write-down. At that time we were allowed a partial write-down, and one year later we received another write-down.
4. In the early 1990s, we were able to completely pay back all the production monies we had borrowed from the Western Bank of Clovis, New Mexico. About one month later, we tried to borrow operating capital from the bank for the following year. We were told that the bank had a new policy which stated that all agriculture loans would require a FmHA guarantee. The bank hired Curtis Doyle, an ex-FmHA employee, for the purpose of putting the guarantee loan packages together for the bank. Mr. Doyle was completely familiar with the FmHA's requirements, and he prepared a loan package for us that showed a positive cash flow. We presented this loan package to Mr. Hunton at the FmHA Curry County office. About two weeks later, we received a letter from Mr. Hunton telling us that the county committee had rejected our request. We called W.G. Helmer, a member of the county committee, to find out why the committee had rejected our request. Mr. Helmer told us that Mr. Hunton presented a plan to the committee that showed we needed to borrow about \$90,000 but could pay back only \$60,000, leaving a negative cash flow of \$30,000. Mr. Hunton also showed the committee our credit history and told the

committee they could not approve our request. The loan plan Mr. Doyle prepared for us showed a positive cash flow and that we would be able to service the debt. With Mr. Doyle's experience and knowledge, he would not under any circumstances prepare a loan request that did not meet the FmHA requirements. Either someone changed the figures on our loan package, or rewrote the loan package and signed our name to it. All of my neighbors who requested a FmHA guarantee received one.

5. We immediately wrote a letter of complaint to Winford Riley, the supervisor in the New Mexico State FmHA office, after receiving the letter informing us that the county committee had rejected our loan request. I believe that Mr. Hunton denied the loan request because I am of Hispanic descent.
6. Because Mr. Hunton denied us the guaranteed loan, we were unable to water or fertilize our crops properly for a number of years. A few years later we were able to obtain limited financing, but it was not enough and we were forced into bankruptcy.
7. In 1998, we filed a Chapter 12 bankruptcy in an attempt to save our farm. The USDA resisted my Chapter 12 every step of the way. The bankruptcy judge did not confirm my Chapter 12 plan, and on June 25, 1998, my lawyer changed the Chapter 12 into a Chapter 7. We have been in possession and continue to farm our farm to date.
8. All during the bankruptcy we were concerned about keeping the monies that the 1996 signed PFC contract allowed. During this time, we stated our concerns to individuals at the Clovis, New Mexico Farm Service Agency (FSA) office, and to Larry Burnett, head of the FSA in New Mexico. Mr. Burnett's only concern was whether or not I was still operating the farm.
9. Since June 25, 1998, we have tried to reaffirm the six-year PFC contract we signed on May 29, 1996. We wrote a letter to the Curry County Committee notifying them of my intent to continue in the PFC Program, and we handed this letter to Kay Kelley at the Curry County FSA office. We have also written memos in an attempt to do whatever was necessary to get our farm into the PFC program.
10. Despite our efforts to renew the PFC contract, the USDA denied our requests for the 1998 and 1999 PFC monies, stating that I did not reaffirm the contract. However, the FSA had denied us the right to reaffirm the contract, and in fact, we were forced to obtain a court order before we were allowed to reaffirm the contract in 2000. We have written several

letters to Kay Kelley at the Curry County FSA office in attempt to resolve this situation, but we have received no response.

11. In March 2000, our attorney George Moore filed a Chapter 12 bankruptcy petition to save our farm. From the outset, Manny Lucero, a lawyer representing the USDA, resisted our attempts to save the farm. Despite the objections of Mr. Lucero, the judge confirmed the bankruptcy plan that would keep the farm in our family. Although the bankruptcy plan called for the 2000 and 2001 PFC monies to be paid to us, Mr. Lucero immediately filed a motion to prevent us from getting these monies. Mr. Lucero keeps telling our lawyer to have us finance our farm somewhere else, and then the government would withdraw its motion that is keeping us from getting the PFC monies. We believe that there may be a connection between this demand and my participation in this lawsuit brought by Hispanic farmers.
12. I believe that the pattern of events clearly shows that the USDA has discriminated against me since the late 1980s. The only difference between other similarly situated farmers who have received all of the available government benefits and me is my ethnicity.
13. Beginning in the early 1990s, I have made numerous complaints about the treatment I have received, including a complaint to the Office of Civil Rights of the USDA. This office sent me a letter stating that the information we submitted constitutes a complete complaint over which they have jurisdiction. We have received no further information regarding the status of our complaint.
14. I believe I was qualified for the loan programs I sought from the FSA, or its predecessor FmHA, and that the agency discriminated against me in processing my requests for assistance because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of fourteen (14) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.

Sonja Madera Myers
Sonja Madera Myers

3.29.02
Date

Exhibit 33

Declaration of Greg C. Ramon

I, Greg C. Ramon, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is March 12, 1947. My mailing address is 220 SE 6th Street, Morton, TX, 79346.

2. I was born and raised in a family of farmers. All I have ever done in my life is farm. From 1961 to approximately 1986 I worked on farms owned by others. During that time I was on the lookout for land I might be able to farm on my own. In 1986 I was able to lease some land for myself from another farmer named Gardner.

3. In 1986 Mr. Gardner, who is an Anglo farmer, assisted me in getting a loan through the Farmers Home Administration (FmHA) so that I could pay for leasing the land. This was about 350 acres of land on which I grew cotton. I worked this land with my sons. I paid back the money that the FmHA had lent me.

4. I was able to lease about 125 acres from a man named Homer Richardson. I submitted a loan application to the FmHA. I received a denial letter from them indicating that I was being turned down because my credit rating was too good. They indicated I should apply for a loan from a bank and that the FmHA only helped people who really needed help. I was successful in 1987 in obtaining a loan from a bank with Mr. Richardson co-signing for me. I do not believe I would have been able to obtain a loan otherwise.

5. In 1987 and 1988 I had good crop yields and was able to repay the loans and maintain my good credit. I borrowed money from the bank without needing to have the loan co-signed. In 1989 I lost my cotton crop because of hail. I was able to recover some of my costs from insurance proceeds. Following my loss, I went to the FSA to get disaster relief. I was denied while many other farmers in my area were granted relief. I was told I could not get disaster relief because my farm had no yield. I actually had had good crop yields for the 2 previous years.

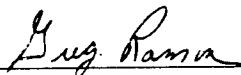
6. From 1990 to 1993 I was unable to find land which I could lease and I worked at custom farming.

7. In 1994 a man named Charlie Sealham agreed to lease approximately 370 acres to me. I approached the Farm Service Agency (FSA) and Mr. Murdoch indicated he did not want to lend money to me because the land was too dry. I complained to Mr. Murdoch that I felt I was being discriminated against because I am Hispanic. I then received a loan from the FSA. I received loans to farm in 1994, 1995 and 1996, and in 1996 I paid back all the money I borrowed that year. In 1997 my loan application was denied by FSA. They indicated there was no money available. I had to turn the land back to Mr. Sealham and did not farm from 1997 to 1999. In 2000 I wrote a letter to Mr. Tony Califa, of the USDA, Office of Civil Rights regarding the fact that I believed my 1997 loan was denied because I am Hispanic. I never got any resolution, however.

8. In 2000, I borrowed money from the bank in order to lease land. At the end of 2000 or in January 2001, I approached the FSA office in Levelland. I was seeking funds for two parcels of land. Merlin Roberts owned one of the parcels and indicated she would lease to me if I received approval from the FSA for the loan. The FSA office kept telling me I would get the money but Ms Roberts was concerned with how long it was taking. She knew about my previous experience in trying to obtain funds and was concerned that in the end I would not receive the funds. She decided she had to lease the land to someone else. The loan did eventually come through, about 4 months later—but, by then, I had already lost that piece of land.

9. I believe the FSA, or its predecessor FmHA, discriminated against me in denying my loans because I am Hispanic.

I neither read nor write Spanish or English. I have had the foregoing Declaration, consisting of nine (9) numbered paragraphs read to me and declare, under penalty of perjury, that it is true and correct to the best of my personal knowledge.



Greg C. Ramon

3-26-02

Date

Exhibit 34

Declaration of Lupe Rejino

I, Lupe Rejino, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is June 5, 1942. My mailing address is Rt. 3 Box 285, Muleshoe, TX 79347.

2. I have 50 years of farming experience and I won Hockley County 4-H contests for producing the best crops. I grew up on a farm, helping my dad with all the chores and tasks necessary on a farm. My father grew cotton, corn, milo, grain sorghum, wheat and vegetables. He farmed about 500 acres. I began farming on my own in 1965. I operated as much as 800 acres at a time. The smallest acreage I ever had was 160 acres. I grew cotton, corn, wheat, vegetables, and grain sorghum.

3. Prior to 1979, I had been borrowing money for farming from the bank. Because of financial losses in 1978, I could not repay my bank loan and had to turn to the Farmers Home Administration (FmHA). In 1979 I did not have difficulty in getting money from FmHA. I was told I met the qualifications. I filled out the application on my own. I received a quick response. I borrowed from Farm Service Agency (FSA), or its predecessor FmHA, every year from 1979 to 1997. I received FmHA operating loans, which I repaid every year. In 1989 the FmHA lent me money to buy land.

4. 1993 and 1994 were very bad crop years. My cotton was damaged by hail for two years in a row. I fell behind in my payments the FSA. This happened to many farmers in my area. Then, in both 1994 and 1995, the money from the FSA came in late. Without that money I had to cut down on fertilizer and other expenses. I could not get as good a price for my crops. I had to get extensions from various dealers on the amounts I owed to them. This also meant that I was delinquent on the money I borrowed from FSA in 1996.

5. In 1994, I contacted Bill Arens, a Framers' Advocate. He assisted me in working out a plan to satisfy my delinquent account with FSA. We put a case together showing them how I could overcome the delinquency and repay them. FSA granted me a write down on my delinquent loan and granted me an operating loan. Despite the fact I was granted the operating loan, I did not receive the proceeds until well into the planting season for corn.

6. Again in 1996, I applied for an operating loan. FSA granted the loan; however, I did not receive the proceeds until late June. By this time, it was too late to plant cotton. I could only plant sorghum and I had to purchase inferior seed because of the lateness in the season. All the good seed was gone. This caused me to have another bad crop year.

7. In 1997, I again tried to work out my delinquency with the FSA. Joyce Thompson, the supervisor of the FSA office in Bailey County, kept saying, "there's a solution to it." She meant that she wanted me to sell my land and pay what I owed. Unable to arrange a payment agreement with FSA, I filed for reconstructive bankruptcy. FSA was ordered by the

bankruptcy Judge to release \$64,000 from the 1996 crop proceeds to me so that I could continue farming. The Judge also instructed FSA to release approximately \$12,000 to my harvester, Sunny Buris. When Mr. Buris called the FSA to collect the \$12,000 payment, the State Officer, David Strauss, told him we released \$64,000 to Mr. Rejino. He also stated that "those Rejinos are a bunch of crooks, you'll never get your money." I filed for bankruptcy liquidation in 1998. I lost my farm. This was the last year that I farmed.

8. I am aware of Anglo farmers who got their money released and who were in the same or similar financial situations as I.

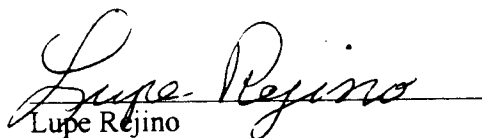
9. Several times in 1993-94, I complained to the Bailey County Employees that FSA was discriminating against me because I am Hispanic. I never received a response.

10. In 1998, when my local FSA office would not release money to pay for attorney fees in relation to the bankruptcy, I had to file a complaint with the State USDA office. I contacted the State Office and complained about FSA's discriminatory treatment against me. I was told to put my complaint in writing, which I did. It has been two to three years and I do not have a ruling on my discrimination complaint.

11. In 1998, 1999 and 2000, I have contacted my Congressman Larry Combest and my Senators Kay Bailey Hutchinson and Phill Gramm. They initially indicated they would help but since that time, I have not heard from them.

12. I believe the FSA, or its predecessor FmHA, discriminated against me in denying my loan application, and in delaying my loans because I am Hispanic. I believe I was treated less favorably than Anglo farmers.

I have reviewed the foregoing Declaration, consisting of twelve (12) numbered paragraphs, and declare, under penalty of perjury, that it is true and correct to the best of my personal knowledge.


Lupe Rejino

3-26-02
Date

Exhibit 35

Declaration on Roberto and Romeo Salinas

We, Roberto Salinas and Romeo Salinas, hereby state and declare the following:

1. My name is Roberto Salinas, and my address is P.O. Box 176, Smyer, Texas. My date of birth is August 17, 1928 and I was born in Zapata, Texas. I am over 18 years of age and a citizen of the United States. Romeo Salinas is my son.
2. My name is Romeo Salinas, and my address is P.O. Box 176, Smyer, Texas. My date of birth is August 1, 1964 and I was born in Lubbock, Texas. I am over 18 years of age and a citizen of the United States. Roberto Salinas is my father.
3. I, Roberto Salinas, have over 48 years of farming experience. I, Romeo Salinas, have over 25 years of farming experience. All of our farming experience has primarily been "hands-on" throughout the years. I, Romeo, however was a member of Future Farmers of America when I was in high school and learned how to raise live stock and how to keep books for a farm in an academic setting.
4. The farm we currently own and cultivate is approximately 64 acres. We also work on the Alderson family farm, which is approximately 2000 acres. On both the farms our main crops are cotton and milo. We manage all the labor and finances on the 64 acre farm. On the 2000 acre Alderson family farm we manage the labor only.
5. In approximately 1981 and 1992, I, Roberto Salinas, attempted to apply for an operating loan from the Farmers Home Administration (FmHA). The loan was for farming expenses related to my 64 acre farm; I had been farming the entire 64 acres. I was not given an application and I was told that my farm was actually not a "farm" but in fact a "garden" and was too small for me to qualify for an FSA loan.
6. In the year 2000 or 2001, I, Romeo Salinas, wanted to purchase a 320 acre farm in Lubbock County, Texas to plant and harvest cotton. I applied for a purchase loan and an operating loan from the Farm Service Agency (FSA) totaling approximately \$400,000. I began the loan process in early 2000 and I was "run around" for about 8 months and then finally denied the loan.
7. After I, Romeo, was turned down for the loan, my dad and I applied for approximately \$200,000 (Louise Pennington, the FSA loan officer indicated "I can only give you \$200,000") as Roberto and Romeo Farm ("R&R") to purchase the same land. R&R was also turned down. Lastly, I, Roberto applied for the same loan by myself, and was also denied. We both have good credit and believe we were both qualified for the loan. We think that the real reason we did not get the loan is because we are Hispanic.

8. We complained to our state representative, Larry Combest, regarding what we believe was racial discrimination with regard to our getting an FSA loan in 2000 or 2001. We have never received a response from him.

I declare under penalty of perjury that the above statement is true and accurate to the best of my personal knowledge.

Executed on 26th of March of 2002

Roberto Salinas
Roberto Salinas

I declare under penalty of perjury that the above statement is true and accurate to the best of my personal knowledge.

Executed on 26th of March of 2002

Romeo Salinas
Romeo Salinas

Exhibit 36

Declaration of Jose A. Tellez

I, Jose A. Tellez, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My date of birth is August 21, 1934. My mailing address is 1151 M. St., Reedley, CA 93654.
2. I was a farmer for 15 years, growing tree fruit on my 4-acre farm, and the 125-acres I managed. I recently sold my farm and moved to the city, where I work as a day laborer.
3. In 1987, I completed and filed a farming loan application with USDA. I never received any reply or notification regarding this application.
4. To follow up on my application, I contacted Victor Lopez, the city mayor who I believe was also a USDA loan officer. In 1987, I complained to him about Farmers Home Administration's (FmHA) unfair treatment. Mr. Lopez said he would investigate my allegations and check on the status of my application. I never heard from him again.
5. I believe I was qualified for the loan I sought from FmHA and that the agency discriminated against me in processing my loan applications because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of five (5) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.

Jose A. Tellez
Jose A. Tellez

03-29-02
Date

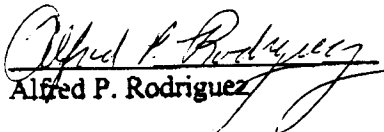
Exhibit 37

Declaration of Alfred P. Rodriguez

I, Alfred P. Rodriguez, hereby state and declare the following:

1. I am over 18 years of age, Hispanic, and a U.S. citizen. My date of birth is July 20, 1939. My mailing address is 235 S. Fowler Ave., Fowler, CA 93625.
2. I have been a farmer for 40 years, incrementally increasing the size of my farm to 220-acres, 140 of which I own. I grow grapes for raisins.
3. In 1982, 1983, and 1984, I applied for loans from USDA. The application for these loans filled an entire binder with paper. With the assistance of a staff person from my Congressman's office, I completed and filed my application, but was turned down.
4. At a hearing of the USDA panel considering one of these loans, I was told that a regular bank would grant my loan, and I was therefore turned down. This decision was made in spite of the fact that my application contained five (5) denial letters from different banks resulting from applications I made for these same needs. I complained to the panel that their decision was incorrect, but was told that the decision was final.
5. Upon applying for another of the three loans, I was informed that I should return in the afternoon when they would have more funds. At 1:30 p.m. when I returned, I was informed that all funds had been distributed earlier in the day. I repeatedly complained to the staff that this treatment was unfair and that I did not see others being given the same run around as me. I still received no assistance.
6. I believe I was qualified for the loans I sought from FmHA and that the agency discriminated against me in processing my loan applications because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of six (6) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.


Alfred P. Rodriguez

3-~~15~~-20-02
Date

Exhibit 38

Declaration of Andres R. Settle

I, Andres R. Settle, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is February 18, 1953. My mailing address is 4820 S. Temperance, Fowler, CA 93626.

2. Many of my forefathers were farmers, including my great-grandfather and my grandfather. I farmed as a child and learned all aspects of farming for crops such as grapes and vegetables.

3. For many years I worked as a trucker and saved my money in the hopes of some day buying some land to farm. In 1989 or 1990, I was able to put a down payment on a parcel of land of about 15 acres. I used this land to grow grapes.

4. Due to various financial mishaps in 1994, I approached the Farm Service Agency (FSA) in 1995 about a loan to help with my farming. I was given the application, which I found to be extensive, complicated and confusing.

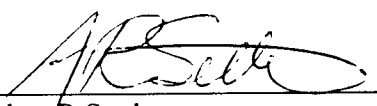
5. I returned to the FSA office and indicated that I required assistance in filling out this application. It was my understanding that this was part of the service offered by the FSA. I was told that no one could help me. In 1995, I complained to the supervisor of the office. She indicated to me that there was no money and that they were short of help and that no one had the time to assist me. In addition, the supervisor stated that I probably had not been in business long enough.

6. At the same time that I was asking for assistance and being turned down, there were several Anglo farmers in the office who were also waiting to receive assistance. These Anglo farmers were provided assistance with their applications when I was not.

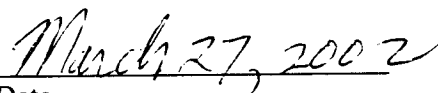
7. Because I was not able to borrow money from the FSA I was forced to sell about two-thirds of my land. Today I continue to farm the remaining four acres, but I am forced to maintain outside employment in order to support my family and myself.

8. I believe the FSA discriminated against me in refusing to provide me with assistance in completing my loan application because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of eight (8) numbered paragraphs, and declare, under penalty of perjury, that it is true and correct to the best of my personal knowledge.



Andres R Settle



Date

Exhibit 39

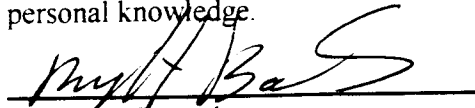
Declaration of Rigoberto Banuelos

I, Rigoberto Banuelos, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My date of birth is December 22, 1948. My mailing address is 6412 Walnut Avenue Fresno, CA 93706.
2. I acquired a 10-acre farm in January of 1986 and another 20- acre farm in May of 1988. I have been farming ever since 1988. My farm consists entirely of grapevines. I grow grapes that are used to make raisins.
3. I went to the Fresno, CA office of Farmers Home Administration (FmHA) in 1988, 1991 and 1992. On each visit, I was told that there is no money available. I was also told that nobody here speaks Spanish so we can't talk to you right now. I told the person that my wife, who accompanied me on each visit, speaks English well, but he ignored us. I never even got an application. I was told to try private banks, because they couldn't help me. I was not able to secure a loan for my farm and that has caused me tremendous financial harm.
4. During my visits to the FmHA in 1988, 1991, and 1992, I complained that the government has so much money for farmers but they only give it to the white farmers not Spanish farmers. I also complained that they were not treating me fairly. I was always told that they had no money and that there was nothing they could do to help me.
5. I intended to use the loan from the FmHA to install a new irrigation system on my farm. That system would have made my crops twice as productive. I conservatively estimate that I have lost \$20,000 a year for the last ten years, because I have been unable to install a new irrigation system.
6. The price of grapes has been about \$400 per ton for the past three years. Prior to that, the price was about \$1,000 per ton. This steep price decrease made it even more important for me to increase my crop yield.
7. In approximately 1998 I applied for disaster relief for damage to my grape crops caused by severe sunburn. I applied for approximately \$17,000 but only got about \$7,000. The only reason I was given for this drastic decrease in my disaster relief payment was that there was also a freeze on local orange crops.

8. Each time I went to the FmHA in Fresno, California to attempt to apply for a loan, I was qualified for the loan I sought. I believe that the FmHA discriminated against me because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of eight (8) numbered paragraphs, and declare under penalty that it is true and correct to the best of my personal knowledge.


Rigoberto Banuelos

3-25-02
Date

Exhibit 40

Declaration of Roberto Perez

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

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is August 16, 1942. My mailing address is P.O. Box 934, Fabens, TX 79838.

2. I grew up on my father's farm and learned all about farming and working the land with my father. After college I began custom farming with my father. My father eventually purchased a custom farming business from his employers.

3. I began leasing land. I leased land from Mr. Hailey and Mr. Wilson. I leased one big farm from Sunny Schultz, about 215 acres. This continued for 4 years until Mr Schultz leased the land to someone who would pay a higher price. I found another farm to lease from a Mrs. Cook. Eventually I purchased two parcels of land from Billy McJobe, consisting of approximately 460-480 and 560-580 acres, respectively. I also owned about 20 acres of land with my father near where I grew up. I did not borrow any funds from Farm Service Agency (FSA), or its predecessor Farmers Home Administration (FmHA). My funding came from the First National Bank of Fabens. In 1987 I began dealing with PCA Bank which offered a lower interest rate.

4. In 1990 my land was flooded in relation to a reclamation project. I had cotton rust and lost most of my crop. My insurance covered only damage from hail. PCA Bank indicated they would only lend me money for the next year if I received a guarantee from the FmHA. I was directed to the FmHA office in El Paso and dealt with Jesse Garcia. Mr Garcia recommended Dale Mormon to help with the application. Mr. Mormon charged me \$1,000 to complete the application. I have subsequently learned that Mr Mormon had some kind of arrangement with the manager of the El Paso FmHA office, Don Cruz, whereby the office would steer business to Mr. Mormon. Once the application was completed and submitted I waited for two or more months for a response. Each time I called the office Mr. Garcia indicated they were working on it. Finally I was told the application was denied. In 1990, I called Mr Garcia to complain about this. He said to me that he knew the loan would not come through because I had a full-time job in addition to farming.

5. I am aware of several neighboring Anglo landowners who also had full time jobs but whose applications were not denied by the FSA. Many of them were in a financial situation worse than my financial situation. Gene Henderson worked full time as a border patrol officer and yet his application was approved when mine was not. Jerry Polk worked full time for Kenneth Carr Farms as well as owning farming land next to mine. He was in worse financial shape than I was and he received financing from the FSA. The Miller brothers, also neighboring Anglo farmers, were in bad shape financially and yet they received a guarantee from FSA.

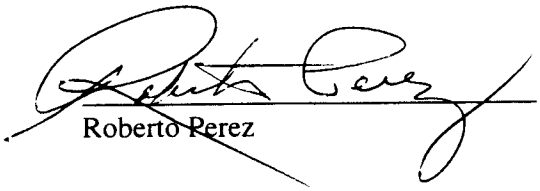
6. I had not finished paying off the mortgage on the land. Bill McJobe took the land

back and sold some of it to my neighbors, the Miller brothers. The Miller brothers had tremendous debt. Because of the speed with which this happened, as well as other factors, it is my belief that PCA Bank had lined up this arrangement prior to sending me to the FmHA as a way of recouping some of the money owed by the Miller brothers.

7. I lost all of the land that I owned. At one point I believe I was one of, if not the, largest Hispanic landowners in my area. Previous to this experience I had been preparing to retire from my other job and turn to farming full time.

8. I believe the FSA, or its predecessor FmHA, discriminated against me in denying my application for a guaranteed loan because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of eight (8) numbered paragraphs, and declare, under penalty of perjury, that it is true and correct to the best of my personal knowledge.


Roberto Perez

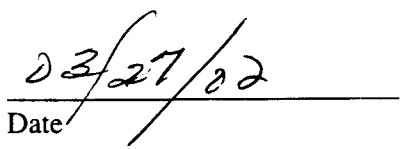

Date


Exhibit 41

Declaration of Rita M. Moreno

I, Rita M. Moreno, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My date of birth is November 16, 1962. My mailing address is 86 Hidden Valley, Royal Oaks, CA, 95076.
2. I have been a farmer for 5 years, and have hired a farming consultant to provide me with additional expertise. On my 6-acre farm I grow cherry tomatoes, zucchini squash, and guava beans, as well as raise 10 head of cattle.
3. In 1999, I tried to apply for a farming loan from USDA. I was informed by the Farmer's Assistance Program staff that my farm was too small, and that there were not enough farms in my area to qualify for a loan. Specifically, I was told my farm needed to be at least 50-acres, and that there needed to be at least four (4) other farms in my area for any of us to qualify. I complained to the staff person at USDA that the decision did not seem fair, but was told that the program's rules were not flexible.
4. In 2000, I again tried to apply for a loan from USDA, this time for loss due to frost. I was again informed that my farm was too small, and that there were not enough farms in my area for me to qualify for assistance.
5. Following my losses in 2000, I complained to the USDA, and my Congressman.
6. I believe I was qualified for the loans I sought from Farm Service Agency, or its predecessor Farmers Home Administration, and that the agency discriminated against me in processing my loan applications because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of six (6) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.


Rita M. Moreno

3-31-02
Date

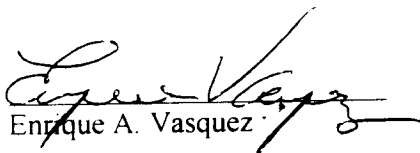
Exhibit 42

Declaration of Enrique A. Vasquez

I, Enrique A. Vasquez, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a Lawful Permanent Resident. My date of birth is June 20, 1953. My mailing address is 7671 S. Orange, Fresno, CA 93725.
2. I have been farming for 30 years. I farm grapes for raisins, tomatoes, and onions on 140 acres. I had another 80 acres I had to give up due to financial difficulty.
3. In 1998, I applied for an emergency disaster loan at the USDA with a Mrs. Jones. I received \$105.00, (on which I also paid income tax) for over 100 acres of lost grapes.
4. In 2000, I tried to apply to the USDA for a loan to help cover losses related to the decline in prices of raisins. The FSA told me that I needed to first be denied by seven banks before I could apply for an FSA loan.
5. The USDA staff also informed me that only farmers starting new farms were eligible for loans. I complained and asked about the loans I knew other established farmers had received, but I got no response. Also, when I complained that I was being treated differently than the other established farmers, particularly Anglo farmers, again I got no response.
5. I believe I was qualified for the loans I sought from Farm Service Agency, or its predecessor Farmers Home Administration, and that the agency discriminated against me in processing my loan applications because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of five (5) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.


Enrique A. Vasquez

3/25/2002
Date

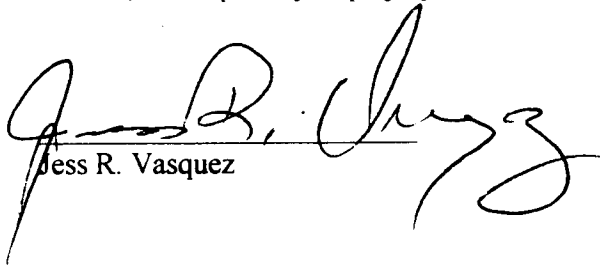
Exhibit 43

Declaration of Jess R. Vasquez

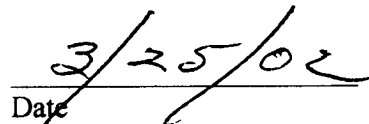
I, Jess R. Vasquez, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My date of birth is December 25, 1949. My mailing address is 1626 E. Floral Ave., Fresno, CA, 93725.
2. I have been farming all my life. I farm grapes for raisins, table grapes, and some vegetables. My father, Marciano Vasquez, born January 10, 1928, died December 25, 1989, farmed 300 acres. When my father died my brother and I split the farm. I currently farm 120 acres, and work a second job.
3. In 1982, I applied for an USDA loan for my Father's farm. The staff informed my father and I that there were no funds available, and we were not permitted to file an application.
4. We asked to be allowed to file an application even if no funds were available, and were told there was no sense in filing an application since no funds were available. We were never given an application.
5. I am currently applying for another Farm Service Agency (FSA) loan. I submitted the loan application in the summer of 2001. I was not provided with any assistance in filling out the application. It has been eight (8) months and I still have not been provided with a decision. Instead, the FSA office requires me to provide additional information, which extends the application process.
6. I believe I was qualified for the loan I sought from FSA, or its predecessor Farmers Home Administration, and that the agency discriminated against me in processing my loan application because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of six (6) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.



Jess R. Vasquez



Date

Exhibit 44

Declaration of Tommy G. Vasquez

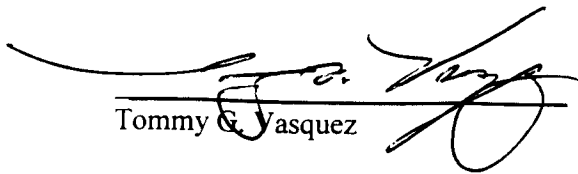
I, Tommy G. Vasquez, hereby state and declare the following:

1. I am over 18 years of age and a U.S. citizen. My date of birth is December 23, 1949. My mailing address is 4636 West American, Fresno, CA 93706.
2. I grew up on a farm with my family. I started helping with the grapes when I was five years old. In addition to grapes, my family planted onions, peppers and squash. I began farming on my own in 1979 working exclusively with grapes. My current farm is 110 acres of grape vineyards.
3. I made at least seven separate in-person visits to the Fresno, California office of the FSA or its predecessor the FmHA. These visits took place on or about November 1983, January 1984, the summer of 1985, the end of 1985, the beginning of 1986, the end of 1986 and early 1987. On each visit, I told the woman in the office that I wanted to get a loan. On each occasion, I was told that there are no funds available. I said that I wanted an application anyway. The woman responded that I shouldn't waste my time because they only keep the applications for a few months before they throw them away. I never actually received an application for a loan so I was never able to apply. The woman always hurried me out of the office.
4. On several of my visits to the FSA or its predecessor the FmHA, I complained that it is not right that I can't fill out an application. I also complained that my neighbors, who were white farmers, were able to get loans easily and that I wasn't being treated fairly. The woman at the FSA or its predecessor the FmHA responded that we don't have money and that's just the way it is.
5. In 1984, I acquired 20 acres of grape vineyards. I attempted to secure a loan from the FmHA in order to purchase fertilizer for the vines. As a direct result of not getting a loan, I was unable to purchase fertilizer for the vines. The resulting yield was poor. In 1985, I returned the 20 acres to the owner, because the payments were too high and the yields too low.
6. I just received a demand letter from my bank: Kerman State Bank for two loans: a \$500,000 real property loan and a \$350,000 operational loan. I had to get these high interest loans, because I could not get the lower interest loans from the FSA or its predecessor the FmHA. My John Deere tractor was repossessed on February 26th. I am in the process of completing the paperwork for a bankruptcy petition. There is a strong

possibility of foreclosure on my farm. My current situation is the direct result of the racial discrimination I experienced from the FSA or its predecessor the FmHA.

7. Each time I went to the FSA or its predecessor the FmHA in Fresno, California to attempt to apply for a loan, I was qualified for the loan I sought. I believe that the FSA, or its predecessor the FmHA, discriminated against me because I am Hispanic.

I have reviewed the foregoing Declaration, consisting of seven (7) numbered paragraphs, and declare under penalty that it is true and correct to the best of my personal knowledge.


Tommy G. Vasquez

3-25-02
Date

Exhibit 45

Declaration of Augustin Ayon

I, Augustin Ayon, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. citizen. My date of birth is April 14, 1958. My mailing address is 7234 East American Avenue, Fowler, CA 93625.
2. I have farmed my whole life. I grew up on a farm and assisted my family with chores around the farm. I acquired my own ranch 30 years ago. My ranch totaled 15 acres, and I grew grapes and onions.
3. In 1983, I went to the Farmers Home Administration (FmHA) office in Fresno, California. I told the woman at the office that I needed a loan. She gave me some forms. I told her that I needed help to fill the forms out, and she said that there is no one here who speaks Spanish. She also said that I wouldn't qualify for the loan anyway and that the FmHA couldn't help me. As I was standing there, a white gentleman asked for help. She told him, "I can help you. They've [referring to me and my wife] been helped already." I said that actually we are still waiting for help. She said that she would be back in a minute and then led the white gentleman to a private room in the back. I waited for a while, but she did not return so I left the office.
4. I never filled out the form, because I could not figure it out. I did not know anyone who could help me with the form.
5. In 1983, when this happened, I complained to the woman at the FmHA that you are treating us like this because we are Mexicans and that this isn't right. I also complained to her that you should have someone in the office to help us fill out the forms. She responded that we had to fill them out ourselves and to do our best.
6. In 1985, my crops went bad, and shortly thereafter, I lost my ranch. I have not farmed since. The loss of my ranch was a direct result of not being able to get a loan. I believe if I had received a loan from the FmHA that I could have continued operating my ranch.
7. When I went to the FmHA in Fresno, California to attempt to apply for a loan, I was qualified for the loan I sought. I believe that the FmHA discriminated against me on the basis of my national origin.

I have reviewed the foregoing Declaration, consisting of seven (7) numbered paragraphs, and declare under penalty that it is true and correct to the best of my personal knowledge.

Augustin Ayon
Augustin Ayon

11-6-02
Date

Exhibit 46

Declaration of Alfredo Alvarez

I, Alfredo Alvarez, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. resident. My date of birth is April 20, 1944. My mailing address is 9747 Southside Road, El Paso, Texas 79927.
2. I have over 20 years of experience in farm operations including land preparation, planting, harvesting and irrigation. I also have mechanical expertise and I am able to repair most of my own farm equipment. I currently own 87 acres, but at one time I leased an additional 540 acres on which I grew mostly cotton.
3. For every year from 1989 to 2001, I applied for farm loans from the Farm Service Agency (FSA), or its predecessor Farmers Home Administration (FmHA), at both its El Paso, Texas office and its Fort Stockton, Texas office. For the first few years, I had no trouble obtaining the loans, and I received the funds in a timely fashion.
4. Starting in 1991, I began to have problems with the loan process. It was at this time that I began dealing with a new loan officer because the previous loan officer (who spoke Spanish) had left the agency. I began to feel that the FSA employees treated me unfairly because I did not speak English. They started to continuously (almost every year) question my farming expertise, and often told me that I probably needed to take farm training courses, even though I had years of farming experience.
5. In every year from 1991 to 2000, my application was approved and I received a loan, but it was usually for less than the amount I requested. Usually, the loan I received was for 20% to 25% less than the amount I requested. When I asked the FSA about this, at first they told me I did not have enough land to support the requested loan amount. In later years, they told me my expenses were now too high to support the loan amount because I had acquired too much land.
6. In addition to receiving a smaller loan than I requested, in every year from 1991 to 2000, I experienced extensive delays and obstacles during the loan application process at the banks and with the FSA. During these years, I would usually file my applications in January or February, but I would not receive the proceeds until after the planting season. The FSA would almost always tell me I needed to supply more information when I submitted my application. I would often go in person to the El Paso, Texas FSA office with my application to make sure I had provided

all the required information. The loan officer would tell me that my application was complete, but then a few days later I would receive a telephone call stating that the main FSA office in Fort Stockton, Texas needed more information before the loan application process could continue. These delays would continue for months, and I would not receive the loan proceeds until well after the planting season.

7. Because I almost always received my loans after planting season, my production significantly decreased, I began to lose my leased lands and of course, owe more money. I did not have sufficient funds to purchase the necessary supplies for the planting seasons, and the landlords needed their rent money early in the year. As a result, I lost the last 215 acres of my leased land between 1999-2001.
8. In 2001, I submitted a loan application to the FSA which contained two proposals. The proposals were: 1) to plant pima cotton, which is more profitable; or 2) to plant upland cotton, which is less profitable, as a last resort. I received a written denial from the FSA which stated that my proposed plan would not be profitable enough to support a loan. However, by the time the loan application was processed, it was too late in the season to plant pima cotton. As a result, the FSA denied the application, saying that upland cotton was not a profitable crop.
9. Because of the delays I faced in the loan application process from 1989 to 2001, I made several written complaints to the FSA's main office in Fort Stockton, Texas. My letters were sent to Jaime Bustamante, Marlene Garber and Bill McAnally. I received no response to my unfair treatment complaints, and I was never told why it took so long for my loan applications to be processed.
10. I believe I was qualified for the loans I sought from the FSA or its predecessor FmHA, and that the agency discriminated against me in processing my loan applications on the basis of my national origin.

I have reviewed the foregoing Declaration, consisting of ten (10) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.


Alfredo Alvarez

040202
Date

Exhibit 47

Declaration of Edward & Norma Flores

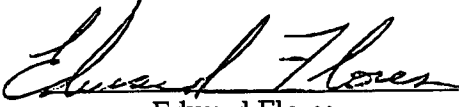
We, Edward Flores and Norma Flores, hereby state and declare the following:

1. My name is Edward Flores and my mailing address is P.O. Box 963, Chimayo, NM 87522. My date of birth is December 18, 1945, and I am over the age of 18, Hispanic, and a United States citizen. Norma Flores is my wife.
2. My name is Norma Flores and I reside with my husband, Edward Flores, in Chimayo, NM. My date of birth is April 1, 1948, and I am over the age of 18, Hispanic, and a United States citizen.
3. We both have over forty (40) years of farming experience. We also were both born and raised on a farm and worked with our parents in all phases of the farm's operations. I, Edward Flores, later attended college and received a Bachelor's Degree in Agronomy. Between 1972 - 1988, we owned 97.5 acres and cash leased approximately 200-250 acres.
4. In or around October/November 1986, we applied for an operating loan with the Dona Ana County Farmers Home Administration Office (FmHA), the Farm Service Administration's (FSA) predecessor. We were approved, but did not receive the loan proceeds until March the following year. To produce a top-notch crop, the land must first undergo land preparation, which includes pre-irrigation, pre-fertilization, applying insecticides, etc. The planting season for our crops began March through May. Receiving the loan funds in March prevented us from doing the necessary land preparation on time. These delays ultimately lead to us producing less than quality products. We, therefore, did not receive top-dollar for our products.
5. The delay in receiving the loan proceeds in a timely manner caused us to be late with payments to our creditors. We purchased fertilizer, fuel, seeds, equipment parts and other farm necessities on credit. Throughout the loan process we would contact FmHA and ask them when we could expect the loan proceeds. We were told that we should receive the funds in 30-40 days. Based on this information we told our suppliers that we would pay them within one month. However, the funds did not come until four months later. Since we did not make the payments as promised, our suppliers would not give us their goods unless we had the money up-front.
6. The delay also caused us to be late with our payments on our property taxes, water bill, leases and other bills. We eventually lost eight farms that we cash leased because the landowners needed their money and could not afford to wait until we received our loan proceeds.
7. Despite the fact we did eventually receive the funds, the delays substantially impacted our production causing us to lose everything. Additionally, the money we received was always significantly less than what we requested. The money simply came too little and too late. We were in essence set up for failure.

8. In September 1987, we discussed with Jim Walters, FmHA Supervisor, the possibility of refinancing a loan that we had with Federal Land Bank. The APR on the Federal Land Bank loan was fourteen (14) percent and we wanted to try to reduce the APR by refinancing with FmHA. Mr. Walters told us that a loan was not possible and did not allow us the opportunity to submit a loan application. In 1987, we complained to Mr. Walters that we were being treated unfairly and differently from other farmers. He stated that there was nothing he could do for us. In November 1987, Federal Land Bank foreclosed on our farmland. No longer able to continue, we stopped farming altogether in 1988. We believe that the FmHA discriminated against us because we are Hispanic.

I declare under penalty of perjury that the above statement is true and accurate to the best of my personal knowledge.

Executed on 4-5-02


Edward Flores

I declare under penalty of perjury that the above statement is true and accurate to the best of my personal knowledge.

Executed on 04/05/02


Norma Flores

Exhibit 48

Declaration of Mark Grijalva

I, Mark Grijalva, hereby state and declare the following:

1. I am over 18 years of age, Hispanic and a U.S. Citizen. My date of birth is December 13, 1963. My mailing address is P.O. Box 2010, Fabens, Texas, 79838.
2. I have been a farmer for the past 13 years. I am a third generation farmer and I learned farming from my father. I farm 600 acres in the lower valley of El Paso, TX, of the 600 acres, I own 130, and the rest of the land I lease. I farm cotton, chili, corn, alfalfa, wheat and milo.
3. My hardships in farming and the inability to expand my farming operation is a result of me not being able to secure Farm Service Agency (FSA) operating loans in a timely manner. From 1989 through 1995, I would always turn my FSA loan papers into the El Paso USDA office early in the year and not get my operating loan until July or May, which is well past the planting season.
4. I believe that there is too much paper work involved in applying for FSA loans, not to mention the time it takes to fill out the loan application. To cope, I would do my loan paper work at night while working on the farm during the daylight hours. I would have to take time away from farming to see my USDA loan officer who would require me to get denial letters from lending institutions, or run down to the court house to get pertinent documents for the FSA loan or wait on documentation from the Secretary of State. I felt as though the USDA made the loan process so difficult as to discourage farmers for applying for loans.
5. In February of 1990, I applied for two FSA loans at the El Paso USDA office. One loan was for operating expenses and the other was a farm ownership loan. I received the FSA operating loan in July of 1990, five months after I applied for the loan and well into the planting season for my crops. I was unable to purchase a very good producing farm at a fair price because I did not receive the farm ownership loan that I applied for in February of 1990 until 1992.
6. In May of 1991, I had an option to purchase another farm at an incredibly low price. I was told by an El Paso county USDA loan officer that it was not worth the effort of applying for a loan because I would not receive the loan money in time to purchase the land.

7. In November of 1991, I wrote a complaint letter to Congressman Ronald Coleman asking his assistance with my dealings with the USDA Farmers Home Administration. On my behalf Congressman Coleman sent a letter to Neal Johnson, the Texas State Director of the USDA.
8. Farm operating loans are given out on a yearly basis. I always applied early for the farm operating loans so I could have the money before the planting season began. The USDA office always gave me my loan money well into the growing season. Due to the lack of capitol early in the year, I was unable to lease more land and to fertilize properly.
9. I believe that I was qualified for the loans I sought from 1990 through 1995 and that the USDA detrimentally effected my means of living by not paying out my loans until way into the growing season. I have always paid off all of my debts on time, never have I been delinquent or filed for bankruptcy. I believe that I was discriminated against.

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


Mark Grijalva

3-20-02
Date

Exhibit 49

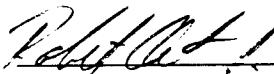
Declaration of Roberto Ortega, Jr.

I, Roberto Ortega, Jr., hereby state and declare the following:

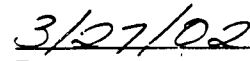
1. I am over 18 years of age, a U.S. citizen and a Hispanic American. My date of birth is March 5, 1963. My mailing address is 1802 West Washington, Anthony, New Mexico 88021.
2. I grew up on a family farm and beginning at age thirteen learned from my father how to plant and grow alfalfa and cotton. At age 21 I began leasing my own farms as owner/operator. I have performed all types of farm work including manual labor, tractor work, and bookkeeping.
3. From 1989 to 1996, I applied each year for a farm operating loan from the Farm Service Agency (FSA), or its predecessor Farmers Home Administration (FmHA), at its Las Cruces office in Dona Ana County, New Mexico. I intended to use the loans to pay the rent on the farms, and to purchase fertilizer, seed, water and other provisions necessary for the operation of my leased farms.
4. I was approved for the loans, but there was always a delay in obtaining the funds, which was usually between five and six months. When I would call the Las Cruces FSA office, the loan officers would initially tell me that the funds were coming, and that I needed to be patient. On one occasion, in 1993, the loan officer stated that I had one of the best records among farmers in the area of repaying my loans, but that I still had to wait to receive the proceeds. Then as the months went by, the loan officers would often tell me that there might not be enough funds for that year to give me a loan, even though I had already been approved. I complained several times to the loan officers that I should have already received the loan proceeds, like my white counterparts. My complaints had no effect.
5. During the time I was waiting for the loan proceeds, my landlords would make constant demands for rent, since they knew I had been approved for my loan. In addition, I was unable to make plans for the farms since I never knew when the loan funds would arrive. When the proceeds finally came in May or June each year it was too late because planting season was already over.
6. At the same time I was experiencing these delays in receiving my loan proceeds, White farmers in the area were getting their loans in a timely fashion. In one instance, a White farmer told me that he received his loan funds within three weeks of submitting his application.

7. As a result of the delays in receiving the loan funds, I was unable to keep my two leased farms running because the money would never arrive in time for planting season. I lost both my leased farms, and have been told by the FSA that I still owe them \$147,000.
8. I believe I was qualified for the loans I sought from the FSA, or its predecessor FmHA, and that the agency discriminated against me in processing my loan applications on the basis of my national origin.

I have reviewed the foregoing Declaration, consisting of eight (8) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of my personal knowledge.



Roberto Ortega, Jr.



Date

Exhibit 50

Class Counsel Biographical Information

Howrey Simon Arnold & White, LLP partner Alan M. Wiseman has extensive litigation and trial experience before numerous federal district and appellate courts and administrative agencies, including the United States Supreme Court. Mr. Wiseman has in depth experience with class action matters; he currently represents a class of over 400,000 tobacco farmers and quota holders in a price fixing and monopolization case against cigarette manufacturers and leaf buyers pending in Greensboro, North Carolina. Mr. Wiseman has represented many plaintiffs in class action lawsuits, as well as defended against the same. He has over 33 years of litigation experience.

Howrey Simon Arnold & White, LLP partner Stephen S. Hill has practiced extensively before federal and state courts and administrative agencies. Mr. Hill was an integral part of a litigation team that successfully represented a thoroughbred breeding syndicate, where the plaintiff alleged, among other things, that the syndicate conspired to fix stud fees and engaged in a group boycott (the syndicate included among its members the Queen of England and the Crown Prince of Dubai). Mr. Hill has represented clients in litigation involving employment discrimination, contract disputes, professional liability, and torts. Steven Hill has 26 years of litigation experience.

Howrey Simon Arnold & White, LLP partner Robert L. Green Jr. has extensive class action litigation experience which expands over more than two decades. Most recently, Mr. Green, successfully defended H.J. Heinz Company against a class action alleging a conspiracy among baby food manufacturers to fix the wholesale prices of baby food. Mr. Green has litigated complex commercial and antitrust cases throughout the United States in a wide variety of industries.

Howrey Simon Arnold & White, LLP special counsel Ken Anderson has over 30 years of litigation experience. Mr. Anderson was a federal prosecutor for 16 where he rose to Section Chief at the Antitrust Division of the U.S. Department of Justice. During his tenure at the Department of Justice, Mr. Anderson was lead trial counsel in U.S. v. Otter Tail Power Co., which became a landmark Supreme Court decision. For approximately two years, Mr. Anderson also served as the Assistant Bureau Director-Energy, in the Bureau of Competition at the Federal Trade Commission. For more than a decade, Mr. Anderson was a partner at the D.C. law firm of Squire, Sanders and Dempsey where he defended clients against the Department of Justice, the Federal Trade Commission and private plaintiffs.

Conlon, Frantz, Phelan, & Pires, LLP partner Alexander J. Pires has nearly 30 years of legal experience. After 7 years at the U.S. Department of Justice, Mr. Pires spent 17 years in private practice representing farmers; he has been lead

counsel in over 50 lawsuits filed on behalf of farmers in federal courts throughout the country.

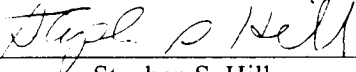
Hogan and Hartson, LLP partner Philip Fraas has been in private practice representing farmers for more than 11 years. Prior to that, he was Chief Counsel of the House Agriculture Committee, responsible for all USDA programs and laws.

Mr. Pires and Mr. Fraas are Lead Counsel in Pigford v. Glickman, a similar class action lawsuit in which over 22,000 Black farmers are participating under a Consent Decree.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiffs' Supplemental Memorandum In Support of Their Motion For Class Certification was served by hand delivery, this 8th day of April, 2002 upon the following:

Jean Lin, Esquire
UNITED STATES DEPARTMENT OF JUSTICE
Civil Division
Federal Programs Branch
901 E Street, N.W.
Room 1014
Washington, DC 20530


Stephen S. Hill