

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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GUADALUPE L. GARCIA, JR., et al.,		)	
		)	
Plaintiffs,		)	
		)	
v.		)	Civil Action No. 1:00CVO2445
		)	Judge Robertson
ANN VENEMAN,		)	
		)	
Defendant.		)	
<hr/>		)	

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DEFENDANT**

Pursuant to Fed. R. Civ. P. 33, plaintiffs direct the following Plaintiffs' First Set of Interrogatories to defendant Ann Veneman, Secretary of the United States Department of Agriculture. Plaintiffs request that defendant answer separately and fully in writing under oath each of the following interrogatories. By order of the Court, defendant is required to serve her objections, if any, upon plaintiffs by delivering the same to undersigned plaintiffs' counsel at Howrey, Simon, Arnold & White, 1299 Pennsylvania Avenue, N.W., Washington, DC 20004, on or before February 14, 2003. To the extent that defendant does not object to interrogatories or portions thereof, plaintiffs request that defendant respond to any unobjected-to interrogatories or portions thereof on or before February 24, 2003.

**I. Definitions**

As used herein, the following definitions apply:

- A. The term "Agency" shall mean the Farm Services Agency ("FSA") or its predecessor Farmers Home Administration ("FmHA") and any of its administrators, agents, servants, employees, and representatives, including

attorneys and other persons acting or purporting to act on the Agency's behalf and/or the United States Department of Agriculture's Office of Civil Rights and any person or agent acting on its behalf.

- B. As used in these interrogatories, the words "you," "your," "yourself" and the abbreviation "USDA" refer to Ann Veneman and each of her predecessor secretaries of the Department of Agriculture since January 1, 1981, her and their agents, attorneys, representatives, and anyone acting on her or their behalf, including, but not limited to, any official, employee, agent, consultant, office, agency, administration, division or entity of any sort, no matter where located, working on behalf of the United States of Department of Agriculture in connection with the administration of farm credit or benefit program or civil rights enforcement or investigation, including, but not limited to, discrimination complaints by farmers and ranchers in connection with farm credit or benefit programs.
- C. The term "document" refers to any written, printed, typed, electronic, recorded, graphic, illustrative, photographic or computer stored or recorded matter – however produced, recorded, stored or reproduced – of any kind or description (whether for internal or external use, sent or received) including originals and all copies of the original which differ in any respect from the original (whether by interlineation, draft copy, notations written thereon, indication of copies sent or received or to whom rerouted, or otherwise). The term "document" includes, but is not limited to, tangible objects, papers, records, studies, evaluations, handwritten notes, publications, letters, TDD/TTY printouts, correspondence, telegrams, cables, telex messages, memoranda (whether formal, informal, to the file, or otherwise), agreements, leases, reports, notes, videotapes, diaries, calendars, books, manuals,

directives, bulletins, statements, accountings, vouchers, invoices, bills, ledgers, tax records, contracts, minutes and summaries of meetings, conversations or communications of any type including telephone conversations, writings, drawings, graphs, charts, photographs, negatives, phono-records, electronic mail, computer files, archival tapes, disks, faxes and other data compilations from which information can be obtained, translated, if necessary, into reasonably usable form.

- D. The singular form shall include the plural form and vice-versa.
- E. The term “regarding,” “relating,” or “related to” means constituting, comprising, evidencing, reflecting, respecting, discussing, referring, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, or studying, or any other term synonymous with or similar to the foregoing.
- F. The term “credit” refers to loans of any sort issued by the Agency or you as those terms are defined herein and to debt service or servicing as those terms are used by the Agency and you. Loans include, but are not limited to, operating loans, farm ownership loans, guaranteed loans, emergency loans, soil and water loans. The term “benefits” refers to grants and subsidies issued by the Agency or you as those terms are defined herein, including but are not limited to, disaster relief, conservation reserve program, production flexibility, etc.
- G. The term “person” shall mean and include a natural person, corporation, firm, partnership, proprietorship, association, and every other type of organization or entity.
- H. The terms “identify” and “indicate”:

- (i) when used in reference to an individual shall mean to state his or her full name, present or last known residential address, present employer and business address;
- (ii) when used in reference to a document shall mean to state the type of document, date, author, addressee, title, address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and
- (iii) when used in reference to any act, occurrence, occasion, meeting, written or oral communications, discussion, transaction or conduct shall mean to set forth the event or events constituting such act, its location, the date and person participating, present or involved, and the documents relating to or referring in any way thereto; when used in reference to any discussion, conversation, written or oral communication, or statement shall mean, in addition to the foregoing, to set forth the substance of the discussion.

- I. "All" shall be construed to mean any or all, and "any" shall be construed to mean all or any.
- J. The terms "include" or "including" refers to an incomplete listing of illustrative examples and does not limit or narrow the scope of any request.
- K. The term "relevant time period" shall mean the time period from **JANUARY 1, 1981 THROUGH DECEMBER 31, 1996 AND OCTOBER 13, 1998 TO THE PRESENT.**
- L. The terms "Hispanic farmer" or "Hispanic rancher" shall mean an American farmer or rancher of Spanish or Latin American origin or descent and

encompass any and all definitions of those terms used by the USDA in connection with any official record keeping function.

M. The terms “white male farmer” or “white male rancher” shall mean all farmers and ranchers who identify themselves as white or Caucasian males in connection with any farm credit or benefit program application process and encompass any and all definitions of those terms used by the USDA in connection with any official record keeping function.

N. “And” and “or” shall be construed disjunctively or conjunctively, and the singular form of a word shall be interpreted in the plural and the present tense shall include the past tense and vice versa, as necessary in order to bring within the scope of any request all information that might otherwise be construed to be outside its scope.

O. “Complaint” refers to the Second Amended Complaint that plaintiffs filed in the above-captioned action.

P. The term “relevant county” as used in these interrogatories refers to the counties listed on Appendix A and Appendix B to these interrogatories.

## **II. Instructions**

A. For every interrogatory, your response should include all of the responsive information known to or by you as the term “you” is defined herein from the relevant time period.

B. In responding, to these interrogatories, each answer should be preceded by the interrogatory to which it is responsive and should be organized in such a way as to respond fully to the interrogatory as it is set forth.

C. Whenever a claim of privilege, confidentiality, or an objection is made to a part or parts of an interrogatory, provide an explanation of the grounds of the objection, and

an indication of whether the claim of privilege, confidentiality, or other objection is being asserted with respect the entire interrogatory or a portion thereof. If the objection or claim of privilege is with respect to only a portion of the interrogatory, all remaining portions of the interrogatory should be answered in full.

- D. The following interrogatories shall be deemed to be continuing in nature and any additional information or documents relating in any way to these interrogatories that you acquire up to or during any hearing or trial that this Court shall conduct shall be furnished to us promptly after such information or documents are acquired.

### **INTERROGATORIES**

INTERROGATORY NO. 1: For each relevant county, identify each Hispanic farmer who applied for any farm credit and/or non-credit benefit during the relevant time period and for each instance state the type of credit or benefit requested (e.g., operating loan, disaster relief, subsidy, etc.), the number of acres the farmer owned and/or leased, the number of years of farming experience, the date the application was received, the date a decision was issued, the date the farmer was notified about the decision, if approved, whether the loan was disbursed in a single lump sum or distributed in periodic distributions and if the latter, the amount of each distribution and the date the distribution was issued, if not approved, the basis for the denial, and the number of farm plans prepared during the application process.

ANSWER:

INTERROGATORY NO. 2: For each relevant county, identify every white male farmer who applied for credit and/or a benefit during the relevant time period and for each instance state the type of credit or benefit requested (e.g., operating loan, disaster relief, subsidy, etc.), the number of acres the farmer owned and/or leased, the number of years of farming experience, the date the application was received, the date a decision was issued, the date the farmer was notified about the decision, if approved, whether the loan was disbursed in a single lump sum or distributed in periodic distributions and if the latter, the amount of each distribution and the date the distribution was issued, if not approved, the basis for the denial, and the number of farm plans prepared during the application process.

ANSWER:

INTERROGATORY NO. 3: Do you contend that Hispanic farmers received the same information regarding farm credit and benefit programs as white farmers? If not, why?

ANSWER:

INTERROGATORY NO. 4: Did USDA or the Agency ever provide information regarding farm credit and benefit programs in Spanish, if so, identify all such instances and if not, state why?

ANSWER:

INTERROGATORY NO. 5: For each relevant county, identify the amount of funds given to the county for each credit and benefit program (i.e. ownership loans, operating loans, disaster relief programs etc.) for each year during the relevant time period, and indicate the actual amount distributed to the farmers under each program and any amount not dispersed at the end of the fiscal year.

ANSWER:

INTERROGATORY NO. 6: For each relevant county, identify each Hispanic farmer who had a supervised account during the relevant time period, and indicate the date such account was established, the date the account was closed, if applicable, and the reason for establishing such an account.

ANSWER:

INTERROGATORY NO. 7: For each relevant county, identify each white male farmer who had a supervised account during the relevant time period, and indicate the date such account was established, the date the account was closed, if applicable, and the reason for establishing such an account.

ANSWER:

INTERROGATORY NO. 8: For each relevant county, identify each Hispanic farmer who filed a written or oral discrimination complaint during the relevant time period and provide the date complaint was filed, description of the complaint, the actions taken, if any, to resolve the complaint, and, if an investigation was conducted, provide the dates the investigation commenced and ended, as well as any findings or final decision, and the date the farmer was notified.

ANSWER:

INTERROGATORY NO. 9: For each relevant county, identify all of the Agency's benefit and credit programs provided to farmers during each year of the relevant time period.

ANSWER:

INTERROGATORY NO. 10: For each relevant county, state the number of Hispanic farmers located in that county for each year during the relevant time period.

ANSWER:

INTERROGATORY NO. 11: For each relevant county, state the number of white male farmers located in that county.

ANSWER:

INTERROGATORY NO. 12: For each relevant county, state the number of complaints filed by Hispanic farmers with respect to credit and benefit programs that the Agency processed during each year of the relevant time period, and identify each such complainant.

ANSWER:

INTERROGATORY NO. 13: For each relevant county and for each year during the relevant time period, identify every Agency employee and official who has been accused of discriminating against Hispanic farmers, the nature of the complaint, race/national origin/ethnicity, whether any

disciplinary action was taken against the accused employee/official, whether an investigation was conducted; if so, the outcome, if not, why.

ANSWER:

INTERROGATORY NO. 14: State the Agency's policy for document retention and/or destruction related to civil rights complaints, applications for farm credit and participation in non-credit farm benefit programs and with respect to files of farmers who had existing loans or participated in non-credit farm benefit programs during the relevant time period.

ANSWER:

INTERROGATORY NO. 15: Identify the persons who organized and conducted the "Partnership" meeting held at the Holiday Inn in Alamosa, Colorado on or about November 21, 2002 and identify the persons who were either invited to attend that meeting or were given notice of any sort that the meeting would take place and state whether any Hispanic farmer or rancher was given notice of the meeting and if not, state the reason why no Hispanic farmer or rancher was given notice of the meeting, and describe in detail the subject matter and purpose of the meeting and identify each instance in which a similar meeting was held during the relevant time period in Alamosa, Colorado or in any relevant county, and for each such meeting provide all of the information requested with respect to the aforementioned November 21, 2002 "Partnership" meeting.

ANSWER:

INTERROGATORY No. 16: Identify each individual within the USDA or the Agency who in any way participated in the decision to have Mr. Tyn Davis of Ft. Hancock, Texas, declared ineligible to participate in the cotton subsidy program on or about August 2002 or who in any way had knowledge of any such decision or action designed to carry out that decision; with respect to each such individual indicate precisely what role the individual played in the decision or in any action to carry out the decision and what knowledge the individual had with respect to the decision or any action taken to carry it out, identify all documents that refer to, relate to, discuss or constitute the decision to have Mr. Davis declared ineligible to participate in the cotton subsidy program and identify all of the individuals who played any part in the decision to report to Congress or any member thereof that Mr. Davis' alleged ineligibility to participate in the cotton subsidy program was the result of a "computer glitch" and identify all documents that either support or refute or otherwise call into question the alleged "computer glitch" as the cause of Mr. Davis having been declared ineligible to participate in the cotton subsidy.

ANSWER:

INTERROGATORY NO. 17: Identify each analysis, investigation, audit or review of your lending practices and your administration of non-credit farm benefit programs undertaken by any entity, including, but not limited to, you, the USDA or subdivision thereof, the United States Commission on Civil Rights, either House of the United States Congress or any committee or subcommittee thereof, the Senate or U.S. House of Representatives, Government Accounting Office or the Office of the Inspector General or any consultant, undertaken during the relevant time period, describe the results or conclusions of each such analysis, investigation, audit or review and identify in all documents that reflect, refer to, comprise or constitute any such analysis, investigation, audit or review.

ANSWER:

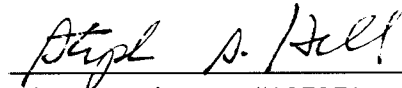
INTERROGATORY NO. 18: Identify all documents that you consulted or reviewed or referred to in any way in connection with preparing or verifying your response to these interrogatories and for each such document identify the interrogatory with respect to which you consulted, reviewed or referred to such document.

ANSWER:

INTERROGATORY NO. 197: Identify each person who answered or provided any information to assist in answering each of the foregoing interrogatories.

ANSWER:

Respectfully submitted,



Of Counsel:

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Attorneys for Plaintiffs  
GUADALUPE L. GARCIA, JR., et al.

Dated: January 21, 2003

# APPENDIX A

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Acosta, Alberto</b>	P.O. Box 333 Animas, NM, 88020	Dona Ana County Las Cruces FSA office
<b>Alvarez, Alfredo</b>	9747 Southside Road El Paso, TX 79927	El Paso County FSA office and Fort Stockton County FSA office
<b>Alvarez, Jimmy and Elizabeth</b>	R.R. Box 18, Salem, NM 87941	Dona Ana County Las Cruces FmHA office
<b>Alvarez, Ruben</b>	7336 S. Alta Avenue Reedley, CA 93654	Tulare County Visalia FSA Office
<b>Amezquita, Salvador</b>	24795 El Rosario St. Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Arevalo, Gustavo</b>	228 Tapadero St. Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Arevalo, Ricardo</b>	228 Tapadero St. Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Atayde, David</b>	P.O. Box 9288 Salinas, CA 93915	Monterey County Salinas FSA Office
<b>Atayde, Juan</b>	598 Mariposa Street Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Banuelos, Rigoberto</b>	6412 S. Walnut Fresno, CA 93706	Fresno County Fresno FSA office
<b>Bernal, Efrain</b>	490 Pini Road Watsonville, CA	Monterey County Salinas FSA Office
<b>Camargo, Alejandro</b>	1478 E. El Dorado Reedley, CA 93654	Fresno County Fresno FSA office
<b>Camargo, Jose</b>	1329 E. El Dorado Reedley, CA 93654	Fresno County Fresno FSA office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Cantu, Manuel N.</b>	P.O. Box 973 San Juan, TX 78589	Hidalgo County Edinburg FSA office
<b>Ceja, Guillermo</b>	2311 Main Street #33 Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Chaidez, Jose &amp; Flora C.</b>	6763 S. Cherry Avenue Fresno, CA 93725	Fresno County Fresno FSA office
<b>Chavarria, Larry &amp; Robert</b>	P.O. Box 386 Lemoore, CA 93245	Kings County Hanford FSA office
<b>Cisneros, Juan J.</b>	P.O. Box 704 Questa, NM 87556	Taos County FSA office, Espanola FSA office, Estancis FSA office
<b>Contreras Alex</b>	390 Duhon Drive Sour Lake, TX 77659	Memphis Texas Hall County FSA office
<b>Contreras Joe</b>	P.O. Box 912 Childress, TX 79201	Memphis Texas Hall County FSA office
<b>Contreras Louis</b>	P.O. Box 912 Childress, TX 79201	Memphis Texas Hall County FSA office
<b>Cornejo, Valentin</b>	153 Live Oak Road Watsonville, CA 95076	Monterey County Salinas FSA Office
<b>Davis, Tyn</b>	P.O. Box 751 Ft. Hancock, TX 79839	El Paso County FSA office
<b>Encinias, Oracio (Rusky)</b>	3638 QR 63.8 Tucumcari, NM 88401	Quay County Tucumcari FmHA office
<b>Espindola, Antonio</b>	41650 Road 68 Diniba, CA 93618	Monterey County Salinas FSA Office
<b>Espinosa, Richard</b>	8150 S. Walnut Fresno, CA 93706	Fresno County Fresno FmHA office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Flores, Edward &amp; Norma</b>	P.O. Box 963 Chimayo, NM 87522	Dona Ana County Las Cruces FmHA office
<b>Flores, Hector T.</b>	7535 Adobe Road El Paso TX 79915	El Paso County FSA office
<b>Flores, Joe A.</b>	P.O. Box 2771 Fresno, CA 93745	Fresno County Fresno FmHA office
<b>Flores, Juan</b>	7535 Adobe Road El Paso TX 79915	El Paso County FSA office
<b>Flores, Patrick</b>	Rt-2 Box 61 Pecos, NM 87552	Dona Ana County Las Cruces FSA office
<b>Flores, Salvador T.</b>	P.O. Box 510 Fabens, TX 79838	El Paso County FSA office
<b>Fuentes, Jaime</b>	13665 E. Gettysberg Sanger, CA 93657	Fresno County Fresno FSA office
<b>Galvan, Jose Luis</b>	P.O. Box 130 Fort Hancock, TX 79839	Ft. Stockton FSA office
<b>Garcia, Albert</b>	470 County Road 44 Muleshoe, TX 79347	Bailey County Muleshoe FmHA office
<b>Garcia, Gilbert L.</b>	9300 N Hwy 85 Las Cruces, NM 88005	Dona Ana County Las Cruces FSA office
<b>Garcia, Guadalupe Jr. &amp; Margarita</b>	9303 North Dona Ana Rd Las Cruces, NM 88007	Dona Ana County Las Cruces FSA office
<b>Garcilazo, Ramon</b>	333 Park Side Ct. Greenfield, CA 93927	Monterey County Salinas FSA Office
<b>Garza, Homer</b>	P.O. Box 34 Mesquite, NM 88048	Dona Ana County Las Cruces FSA office
<b>Garza, Joanne</b>	13401 Mulberry Fresno, CA 93648	Fresno County Fresno FSA office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Garza, Rodolfo,</b> Beatrice	106 North Avenue, C Crystal City, TX 78839	Dimmit County Carrizo Springs FmHA office
<b>Gutierrez, Jose R.</b>	P.O. Box 21 Maple, TX 79344	Bailey County Muleshoe FSA office
<b>Hinojosa, David L.</b> and Olivia A.	1215 Boyer Walla Walla, WA 99362	Dona Ana County Las Cruces FmHA office
<b>Iriarte,</b> Norberto	2035 S. Whitney Fresno, CA 93702	Fresno County Fresno FSA Office
<b>Jauregui, Albert</b>	6 Newlyn St. Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Jimenez, Tony &amp;</b> Patricia	3671 Old Toll Road Cathey's Valley, CA 95306	Mariposa County Merced FSA Office
<b>Juarez Maloney,</b> Juana	P.O. Box 5273 San Angelo, TX 76902	Tom Green County San Angelo FSA Office
<b>Ledesma, Javier</b>	P.O. Box 941 Hollister, CA 95024	Monterey County Salinas FmHA office
<b>Linares, Dora</b>	4822 S. temperance Fowler, CA 93625	Fresno County Fresno FSA Office
<b>Llanez, Richard</b> and Mary Helen	1620 W. O'Hara Rd. Anthony, NM 88021	Dona Ana County Las Cruces FSA office
<b>Lopez, Edwardo R.</b>	10306 St. Hwy. 104 Tucumcari, NM 88401	Quay County Tucumcari FmHA office
<b>Mancillas, Reyes</b>	7299 S. East Fresno, CA 93725	Fresno County Fresno FmHA office
<b>Martinez, Jose</b>	5229 W. Robinson Ave Fresno, CA 93722	Fresno County Fresno FSA office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Martinez, Melecio</b>	c/o Edith Lerma 119 East Bolivar Salinas, CA 93906	Monterey County Salinas FSA Office
<b>Medina, Albert</b>	10845 S. Walnut Fresno, CA 95706	Fresno County Fresno FmHA Office
<b>Medina, Angel</b>	86 Hidden Valley Road Royal Oaks, CA 95076	Monterey County Salinas FSA office
<b>Medina, Ismael</b>	1861 McRae Las Cruces, NM 88001	Dona Ana County Las Cruces FSA office
<b>Mendoza, Esrael H.</b>	P.O. Box 944 Willcox, AZ 85644	Grant County Silver City (NM) FmHA office, Luna County Deming FmHA office
<b>Mendoza, Ysidoro F.</b>	P.O. Box 494 Willcox, AZ 85644	Grant County Silver City (NM) FmHA office
<b>Moralez, Gloria</b>	P.O. Box 414 Fresno, CA 93708	Fresno County Fresno FSA Office
<b>Moreno, Rita M. (formerly Rita Alberts)</b>	86 Hidden Valley Royal Oaks, CA 95076	Monterey County Salinas FSA offices
<b>Munoz, Ramon</b>	1008 Atlantic Salinas, CA	Monterey County Salinas FSA Office
<b>Myers, Sonja Madera</b>	1356 CRS Clovis, NM 88101	Curry County Clovis FSA office
<b>Oaxaca, Demetria</b>	27345 San Carlos Madera, CA 93637	Madera County FSA office
<b>Oaxaca, John C.</b>	629 N. College Avenue Fresno, CA 93728	Fresno County Fresno FSA Office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Orozco, Florencio</b>	2073 Santa Rita Street #15 Salinas, CA 93906	Monterey County Salinas FSA office
<b>Ortega, Alberto</b>	Rt. 3 Box 111 Mercedes, TX 78570	Mercedes County Edinburg FSA office
<b>Ortega, Rene</b>	Rt. 3 Box 108-M Mercedes, TX 78570	Mercedes County Edinburg FSA office
<b>Ortega, Robert Jr.</b>	1802 W. Washington Anthony, NM 88021	Dona Ana County Las Cruces FSA office
<b>Ortega, Roberto</b>	1802 W. Washington Anthony, NM 88021	Dona Ana County Las Cruces FSA office
<b>Pairis, Ramon</b>	2417 E. Four Creeks Ct. Visalia, CA 93292	Tulare County Visalia FmHA Office
<b>Panduro, Henry</b>	5299 W. Robinson Ave Fresno, CA 93722	Fresno County Fresno FSA office
<b>Provencio, Edward</b>	P.O. Box 38 Chamberino, NM 88027	Dona Ana County Las Cruces FSA office
<b>Provencio, George</b>	2208 West Washington Anthony, NM 88021	Dona Ana County Las Cruces FSA office
<b>Puentes, Esvirion</b>	6134 West Belmont Ave. Fresno, CA 93722	Fresno County Fresno FSA Office
<b>Ramon, Greg C.</b>	220 SE 6th Street Morton, TX 79346	Cochran County Morton FSA office
<b>Rejino, Lupe</b>	Rt. 3 Box 285 Muleshoe, TX 79347	Bailey County Muleshoe FSA office
<b>Rodriguez, Ruperto R.</b>	Rodriguez Brothers, Inc. 11618 Pompano Lane Houston, TX 77072	Frio County Pearsall FSA office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Ruiz, Elias</b>	7344 S. Cornelia Fresno, CA 93706	Fresno County Fresno FSA office
<b>Ruiz, Stella</b>	5782 S. Elm Avenue Fresno, CA 93706	Fresno County Fresno FSA office
<b>Ruiz, Stella &amp; Terry For the Estate of Ignacio Ruiz</b>	5782 S. Elm Avenue Fresno, CA 93706	Fresno County Fresno FSA office
<b>Salinas, Romeo</b>	P.O. Box 176 Smyer, TX 79367	Hockley County Levelland FmHA, Lubbock County FSA office
<b>Salinas, Sr., Roberto</b>	P.O. Box 176 Smyer, TX 79367	Hockley County Levelland FmHA, Lubbock County FSA office
<b>Tellez, Jose A.</b>	1151 M Street Reedley, CA 93654	Fresno County Fresno FmHA Office
<b>Valdez II, Dionicio</b>	Route 6 Box 282-7 Weslaco, TX 78596	Hidalgo County Edinburg FSA Office
<b>Valdez, Erasmo</b>	RR 3 Box 226A Mercedes, TX 78570	Willacy County Raymondville FSA office
<b>Vasquez, Arturo &amp; Berta</b>	P.O. Box 485 Fabens, TX 79838	El Paso County FSA office

## GARCIA NAMED PLAINTIFFS

<b>NAME</b>	<b>ADDRESS</b>	<b>FSA Office</b>
<b>Vasquez, Enrique</b>	7671 S. Orange Fresno, CA 93725	Fresno County Fresno FmHA Office
<b>Vasquez, Jess R.</b>	1626 E. Floral Avenue Fresno, CA 93725	Fresno County Fresno FmHA Office
<b>Vasquez, Lydia</b>	920 E. South Ave Fresno, CA 93725	Fresno County Fresno FmHA Office
<b>Vasquez, Paul</b>	920 E. South Ave Fresno, CA 93725	Fresno County Fresno FmHA Office
<b>Vasquez, Rodolfo</b> (deceased) and Delia	P.O. Box 942 Fabens, TX 79838	El Paso County FSA office
<b>Vasquez, Tommy</b> G.	4636 W. American Fresno, CA 93706	Fresno County Fresno FmHA Office
<b>Velarde, Frank</b>	1505 E. Main Trinidad, CO 81082	Las Animas County Trinidad FSA office

# APPENDIX B

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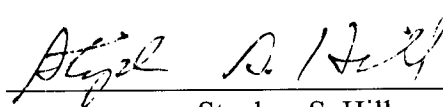
COUNTY OFFICES

ARIZONA	CALIFORNIA	COLORADO	FLORIDA	MONTANA	NEW MEXICO	TEXAS	WASHINGTON
<u>Counties</u> <ul style="list-style-type: none"> <li>• Cochise</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Madera</li> <li>• Martinez</li> <li>• Modesto</li> <li>• San Benito</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Alamosa</li> <li>• Otero</li> <li>• Pueblo</li> <li>• Weld</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Hardie</li> <li>• Hillsborough</li> <li>• Miami Dade</li> <li>• Polk</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Richland</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Chaves</li> <li>• Hildalgo</li> <li>• San Miguel</li> <li>• Union</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Houston</li> <li>• Kinney</li> <li>• Maverick</li> <li>• Milam</li> <li>• Val Verde</li> </ul>	<u>Counties</u> <ul style="list-style-type: none"> <li>• Adams</li> <li>• Franklin</li> <li>• Grant</li> <li>• Yakima</li> </ul>

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of January 2003, I caused a true copy of the foregoing Plaintiffs' First Set of Interrogatories to Defendant to be served upon defendant by causing the same to be hand-delivered to:

Michael Sitcov, Esq.  
Lisa Olson, Esq.  
UNITED STATES DEPARTMENT OF JUSTICE  
Civil Division  
20 Massachusetts Ave., N.W.  
Room 6118  
Washington, DC 20530



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Stephen S. Hill