

Civil Action No. 00-2445 (JR)

EXHIBIT 31

Supplemental 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, TX 79927.
2. On September 30, 2004 I participated in the United States Department of Agriculture ("USDA") Listening Session held at the Valencia County Branch of the University of New Mexico in Los Lunas, New Mexico.
3. During this meeting, with the assistance of a translator, I complained of my Fort Stockton Farm Service Agency ("FSA") Loan Officer, Mr. William McAnally's, ongoing discriminatory treatment directly to Vernon Parker, USDA Assistant Secretary of Civil Rights, Paul Gutierrez, USDA Deputy Assistant Secretary of Civil Rights and James Moseley, USDA Deputy Secretary.
4. My legal counsel had prepared a written complaint for me to submit to the USDA officials detailing FSA's recent discriminatory treatment towards me. The USDA officials from Washington assured me that they would thoroughly investigate my situation and promptly notify me of their findings.
5. To my knowledge, no USDA officials has ever investigated this matter or notified me of the investigation's results.
6. On August 26, 2005 USDA Secretary Johanns visited Las Cruces, New Mexico to hold a Farm Bill Listening Session. After the meeting, with the assistance of a translator, I personally introduced myself to him and informed him of FSA's recent discrimination and harassment towards me. I also provided him with a written document detailing my experiences.
7. Secretary Johanns assured me that USDA strictly adhered to zero tolerance policy towards discrimination and he would see that my situation was investigated immediately.
8. Over a year has passed since I complained directly to Secretary Johanns and I have heard nothing from USDA relating to an investigation of my complaint.

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.

Alfredo Alvarez
Alfredo/Alvarez

10-10-06
Date

Civil Action No. 00-2445 (JR)

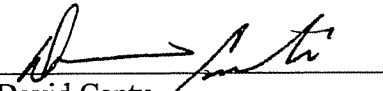
EXHIBIT 32

Supplemental Declaration of David Cantu

I, David Cantu, hereby state and declare the following:

1. I am over 18 years of age, Hispanic, and a United States citizen. My date of birth is May 29, 1959. My mailing address is 502 West 9th Street San Juan, Texas 78589.
2. I am a 4th generation farmer with approximately 20 years of experience growing sorghum, corn, watermelon, cotton, sunflowers, hay, alfalfa, and black-eyed peas. I have extensive experience raising cattle. While in the past I have farmed and ranched approximately 3,500 acres of land, today I farm 1,100 acres.
3. Every year between 1997-2005, the Hidalgo County Farm Service Agency ("FSA") has guaranteed my operating loans through Mercedes National Bank. In 2005, without any change in my circumstances, the Hidalgo County FSA denied my guaranteed loan request. I have a strong suspicion that this denial was in retaliation against me and my father's outspoken criticism of the Hidalgo FSA's discriminatory treatment of Hispanic farmers.
4. On March 30, 2005 I participated in the United States Department of Agriculture ("USDA") Listening Session held in Edinburg, Texas. At this meeting I spoke personally with Vernon Parker, Assistant Secretary for Civil Rights and Paul Gutierrez, Deputy Assistant Secretary for Civil Rights regarding my suspicions of FSA's recent discriminatory behavior. Mr. Parker assured me they would look into the matter and promised me that it would be promptly resolved.
5. Between August 24 – 26, 2005 I attended the First Annual Hispanic Farmers' Conference in Las Cruces New Mexico, where Mr. Parker and Mr. Gutierrez were in attendance. I again reminded Mr. Parker of my recent problems with the Hidalgo County FSA office. He again assured me that they would look into the matter.
6. Over a year and a half has passed since I initially complained to Mr. Parker. I have still heard nothing from USDA relating to any investigation of my complaint. Nor has Mr. Parker "promptly resolved" the matter, as he had promised.

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.



David Cantu

10-15-06
Date

Civil Action No. 00-2445 (JR)

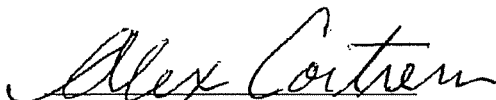
EXHIBIT 33

Supplemental Declaration of Alex Contreras

I, Alex Contreras, hereby state and declare the following:

1. My name is Alex Contreras and my address is 390 Duhon Drive Sour Lake, Texas 77659. My date of birth is April 25, 1952 and I am over the age of 18, Hispanic and a United States citizen.
2. In July 2004 I submitted a discrimination complaint on behalf of my father, Luis Contreras, to Ms. Lorna Lewis of the Office of Civil Rights ("OCR") of the United States Department of Agriculture ("USDA"). In this complaint I detailed the various types of discrimination that my father had experienced on both a local and national level within the USDA.
3. Several years ago my father had filed a discrimination complaint with the USDA which the OCR completely ignored. Out of fear that the OCR would again ignore my discrimination complaint, I sent the following individuals a copy of my complaint: Paul Gutierrez, USDA Deputy Assistant Secretary of Civil Rights, Vernon Parker, USDA Assistant Secretary of Civil Rights, Clyde Thompson, USDA Associate Assistant Secretary of Civil Rights, and Chuck Connors, USDA Deputy Secretary.
4. We never received a response from the USDA's OCR concerning the discrimination complaint that we submitted in July 2004. Based on our personal experience, the USDA's OCR continues to be as dysfunctional as it was in the 1980s and 1990s.

We have reviewed the foregoing Declaration, consisting of four (4) numbered paragraphs, and declare, under penalty of perjury that it is true and correct to the best of our personal knowledge.


Alex Contreras

10-11-06
Date

Civil Action No. 00-2445 (JR)

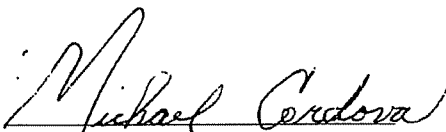
EXHIBIT 34

Supplemental Declaration of Michael Cordova

I, Michael Cordova, hereby state and declare the following:

1. I am over 18 years of age, Hispanic, and a United States citizen. My date of birth is October 10, 1949. My mailing address is P.O. Box 596, Veguita, NM 87062.
2. On September 30, 2004 I participated in the United States Department of Agriculture ("USDA") Listening Session held at the Valencia County Branch of the University of New Mexico in Los Lunas, New Mexico.
3. During this meeting, I seized the opportunity to complain about the Los Lunas Farm Service Agency's ("FSA") discriminatory treatment towards me when the office foreclosed on my farm and refused to provide me with a buy back option when the regulations required them to do so. Their explanation for refusing to offer me this option was because allegedly I had "no character."
4. I discussed this matter at great length with FSA Associate Administrator Dr. Tom Hoffeler and Scott Mexic, the USDA Director of External Affairs. They both said that my case should be thoroughly investigated and recommended that I immediately file a complaint to the Office of Civil Rights ("OCR").
5. Per Messers. Hoffeler's and Mexic's instructions, in October 2004 I submitted a written discrimination complaint to the OCR detailing FSA's discriminatory treatment of me.
6. About two years have passed and no OCR officials have ever investigated this matter or notified me of the results of any investigation. I have not even received any response at all relating to my discrimination complaint.

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.


Michael Cordova

10-7-06
Date

Civil Action No. 00-2445 (JR)

EXHIBIT 35

Supplemental Declaration of Tony and Patricia Jimenez

We, Tony and Patricia Jimenez, hereby state and declare the following:

1. My name is Tony Jimenez and my address is 3671 Old Toll Road, Cathey's Valley, CA 95306. My date of birth is January 12, 1933, and I am over the age of 18, Hispanic and a United States citizen. Patricia is my wife.
2. My name is Patricia Jimenez and I reside with my husband, Tony Jimenez, in Cathey's Valley, CA. My date of birth is January 22, 1939, and I am over the age of 18, and a United States citizen.
3. We both have over sixty (60) years of farming experience. I, Tony Jimenez, have lived on a dairy and cattle ranch since I was nine (9) years old, and I have life-long experience operating dairy and beef cattle ranches. I, Patricia Jimenez, was raised on a farm and worked with my parents in all phases of the farm's operations.
4. In February 2003 we submitted a discrimination complaint to the United States Department of Agriculture ("USDA") after the Farm Service Agency ("FSA") failed to implement a National Appeals Division ("NAD") decision which required the FSA to recalculate the interest, significantly reducing the total amount of our FSA debt.
5. On February 13, 2003 we received a response letter from the FSA Headquarters in Washington, DC, which confirmed that the USDA had received our discrimination complaint and that it had been forwarded to the Office of Civil Rights ("OCR"). We were assured that the OCR would be contacting us shortly to properly address this matter.
6. We never received a word from the USDA's OCR concerning our discrimination complaint. Based on our personal experience, the USDA's OCR continues to be as dysfunctional as it was in the 1980's and 1990's.

We 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 our personal knowledge.

Tony Jimenez 10/06/06

Tony Jimenez Date

Patricia Jimenez 10/06/06

Patricia Jimenez Date

Civil Action No. 00-2445 (JR)

EXHIBIT 36

Supplemental Declaration of Juan Raya

I, Juan Raya, 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 May 5, 1967. My mailing address is 2702 North Griffen Road, Prosser, Washington 99350.
2. I am a fourth-generation farmer who has devoted my entire life to farming and ranching. I was raised on a farm and initially learned how to farm as a young boy from my father and then continued to perfect my skills through years of hands-on experience. The majority of my early years I dedicated to farming. I have spent the past 10 years ranching. For the past 5 years I have ranched independently.
3. In addition to raising goats and cattle, I have experience performing various types of farm-related skills such as preparing the land, fertilizing, planting, harvesting, watering, and applying pesticides. In the past I have also grown cherries, apples, and an assortment of legumes.
4. In January 2005 I submitted a written discrimination complaint to the United States Department of Agriculture's ("USDA") Office of Civil Rights ("OCR"). The impetus for my complaint was the discriminatory treatment I had experienced by Crispin Garza, of the Franklin County Farm Service Agency ("FSA") when I applied for an operating loan.
5. To date, the OCR has not even acknowledged receiving my complaint, yet alone begun investigation its accusations. Frankly, the OCR has not done a thing.

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.

Juan Raya
Juan Raya

10-24-06
Date

Civil Action No. 00-2445 (JR)

EXHIBIT 37

Supplemental Declaration of José Luis Salamanca

I, José Luis Salamanca, 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 May 10, 1951. My mailing address is 2840 CR 97 Sudan, Texas 79371.
2. I am a second-generation farmer and have been farming for most of my life. For the past 25 years I have worked as a foreman on Terry Hutton's farm. I have experience raising the following crops: cotton, corn, wheat, and sorghum. I have also experience raising cattle. Most recently I supervised the cotton production on 770 acres of land.
3. After working as the foreman on Terry Hutton's farm for 25 years, Mr. Hutton decided to retire and desired to assist me so that I could begin to farm independently. He generously offered to sublease his 770 acres to me for \$1.25 per acre. This bargain price also included the use of all of his farming equipment. The only obstacle to my success as an independent farmer was obtaining the initial capital to commence the operation.
4. In February of 2004, I went to the Farm Service Agency ("FSA") of the United States Department of Agriculture ("USDA") in Bailey County, Texas, and applied for an operating loan for approximately \$65,000 to purchase seed, fertilizer, etc. to begin farming independently.
5. After completing and submitting the application, the FSA first informed me that subleasing arrangements were impermissible when applying for operating loans. Terry Hutton then accompanied me to the FSA office to remedy this lease issue and solidify a lease directly between the owner and I. Since then, I have learned that subleasing arrangements are permissible when applying for operating loan.
6. Eventually the FSA denied my farm operating loan application. I am convinced that FSA's prohibited me from successfully being approved for a loan because I am a Hispanic farmer. I feel that the Muleshoe FSA office strongly discriminates against Hispanic farmers.
7. After the FSA denied my operating loan, in April of 2004 I filed a written discrimination complaint with the Office of Civil Rights ("OCR"). The OCR has yet to investigate my discrimination complaint.

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.

José Luis Salamanca
José Luis Salamanca

10 23-06
Date

Civil Action No. 00-2445 (JR)

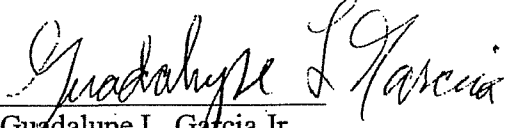
EXHIBIT 38

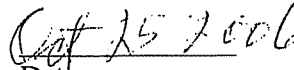
Second Supplemental Declaration of Guadalupe L. Garcia Jr.

I, Guadalupe L. Garcia Jr., hereby state and declare the following:

1. My date of birth is October 23, 1943, and I am over the age of 18, Hispanic, and a United States citizen. My mailing address is 9303 N. Dona Ana Road, Las Cruces, New Mexico 88007.
2. I am a third generation lifetime farmer and have been farming since I was eight years old. I have a Bachelors of Science Degree in Agronomy and a Masters of Science Degrees in Agronomy and Plant Physiology from New Mexico State University.
3. I continue to farm fulltime today. I grow chili, onions, lettuce, broccoli, cabbage, sweet corn, cantaloupe, watermelon, pima cotton, pecans, alfalfa, and Sudan grass. While I currently lease 60 acres, I am in the process of making the necessary arrangements to lease 20 more acres.
4. While the United States Department of Agriculture ("USDA") has not investigated any of my numerous discrimination complaints, including the complaint filed this year, it continues to take adverse action and to discriminate against me. Most recently, the USDA has falsified documents in its efforts to foreclose on my home.
5. On September 22, 2005 Mr. Gary L. Miller, a Roswell, New Mexico, Farm Service Agency ("FSA") Farm Loan Manager, sent me a "Notification of Intent to Accelerate or Continue Acceleration of Loans and Notice of Your Rights" letter. On October 25, 2005 I filed a request for a National Appeals Division ("NAD") appeal. In preparation for the NAD hearing, on November 2, 2005 I requested a copy of Form FSA-580, "Primary and Preservation Loan Servicing Checklist" and FSA-581.
6. Mr. Miller's November 3, 2005 reply included a copy of FSA-580 but no copy of FSA-581, because apparently FSA-581 had not yet been completed. Notice FLP-372 clearly requires that both FSA-580 and FSA-581 be completed prior to notifying the producer that the loan will be accelerated to determine "if the account qualifies for acceleration". The primary purpose of FLP-372 is to ensure that FSA does not elect to accelerate loans in an arbitrary or capricious manner. Mr. Miller began the acceleration process without completing the requisite form FSA-581.
7. The copy of form FSA-580 that FSA provided me was also purportedly signed and dated by Mr. Miller on September 22, 2005. However, this document's content references both a meeting that was not held until October 20, 2005 and an appeal that was not filed until October 25, 2005. It is apparent that these forms were either altered or falsified.

I declare under penalty of perjury that the above seven (7) paragraphs are true and accurate to the best of my personal knowledge.


Guadalupe L. Garcia Jr.


Date