

David F. Sugerman (OSB No. 862984)
Nadia H. Dahab (OSB No. 125630)
SUGERMAN LAW OFFICE
707 SW Washington Street, Suite 600
Portland, OR 97205
Telephone: (503) 228-6474
david@sugermanlawoffice.com
nadia@sugermanlawoffice.com

Randolph T. Chen (D.C. Bar No. 1032644) (*pro hac vice* forthcoming)
PUBLIC JUSTICE, PC
1620 L Street NW, Suite 630
Washington, D.C. 20036
Telephone: (202) 797-8600
rchen@publicjustice.net
dmuraskin@publicjustice.net

*Counsel for the National Black Farmers Association
and the Association of American Indian Farmers*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

KATHRYN DUNLAP, et al.,

Case No.: 2:21-cv-00942-SU

Plaintiffs,

v.

**DECLARATION OF KARA BOYD IN
SUPPORT OF NATIONAL BLACK
FARMERS ASSOCIATION AND
ASSOCIATION OF AMERICAN INDIAN
FARMERS MOTION TO APPEAR AS
AMICUS CURIAE AND CONDITIONAL
MOTION TO INTERVENE AS
DEFENDANTS**

THOMAS J. VILSACK, in his official
capacity as Secretary of the United States
Department of Agriculture, et al.,

Defendants.

DECLARATION OF KARA BOYD

My name is Kara Boyd. I am over the age of 18 and fully competent to make this declaration.

1. I am the Founder and President of AAIF. I am authorized to speak about AAIF's activities relating to this matter.

2. I am a farmer and an enrolled member of the Lumbee Tribe of North Carolina. I co-manage 1,500 acres of a family farm that includes farmland in the towns of Boynton, Baskerville, and Bracey in southern Virginia. On these farms, I grow crops such as hemp and vegetables; I also raise swine, poultry, and goats.

3. AAIF is non-profit, membership-based organization that represents the interests of Native American farmers. AAIF has over 350 members nationwide, comprised mostly of Native American farmers and ranchers.

4. AAIF invites its members to vote on the organization's agenda items and resolutions in annual meetings. AAIF members are represented by regional representatives at these meetings, who vote on their constituent members' behalf.

5. AAIF's mission is focused on providing outreach, advocacy, and technical assistance to Native American farmers and ranchers. AAIF also seeks to promote investment in support of Native American farmers and ranchers.

6. AAIF's participation in this lawsuit is an integral part of its mission to advocate for and defend programs that provide financial assistance and support to Native American farmers and ranchers.

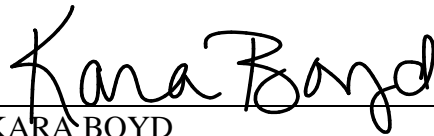
7. In my capacity as President of AAIF, I advocated to federal legislators in early 2021 in support of legislation that would provide loan forgiveness to Native American farmers

and ranchers. I also built support for this legislation by networking with other groups that advocate for the interests of Native American farmers.

8. I am aware that AAIF has members that are eligible for financial benefits under Sections 1005 and 1006 of the American Rescue Plan Act and that they would be injured should this lawsuit enjoin those laws.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 8, 2021



KARA BOYD
Founder & President
Association of American Indian Farmers