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Testimony by

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Farms Irrigated With Federal Project Water in California

October 2, 1987

Hearings of

Committee on Energy and Natural Resources

United States Senate

Washington, D.C.

FARMS IRRIGATED WITH FEDERAL PROJECT WATER IN CALIFORNIA

My name is Don Villarejo. I am Executive Director of the California Institute for Rural Studies, Inc., a ten year old research and education organization with offices in Davis and Bakersfield, California. We conduct programs in three main subject areas: Agricultural Land Ownership/Farm Structure, Farm Labor and Rural Poverty, Rural Toxics.

The Institute is primarily supported by contract work we perform for a variety of agencies and by grants from private foundations. At the present time we are performing work under contract to the Bureau of Reclamation in conjunction with the San Joaquin Valley Drainage Program and for the Agricultural Workers Health Centers of Stockton, California. Our principal private foundation grants this year include the Ford Foundation, the Charles Stewart Mott Foundation, and the Shalan Foundation.

My purpose in appearing before the committee today is to direct your attention to the current practices of large-scale irrigated farming operations in California as they pertain to Federal Reclamation Law. At the outset I want to state that I am in full support of the principle of providing Federal assistance to develop irrigated farming in the West. As a youngster I can recall travelling through the desert areas of the West and coming upon an area of beautiful vegetation made possible by programs operated by the Bureau of Reclamation. For those of us whose homes are in the West it is difficult to imagine what our lives would be like without the Federal projects.

At the same time I know, from first hand experience, the nature of the lives of many of the residents of areas of

California that are located in the heart of the largest of these Federal irrigation projects. Whether its Huron, Mendota, El Centro, Arvin or Dos Palos, one finds a grinding poverty. Family incomes are less than half the state average, mean life spans twenty years shorter than those of the average state resident, mean number of school years completed is eight or nine, and housing conditions are far below minimal standards of decency.

It is not surprising to those of us who live and work in the great Central Valley of California to discover that the 1980 Census of Population ranked us among the worst areas of the nation in terms of poverty indicators. For example, if one looks at the Census data on those metropolitan areas with the largest proportion of the population supported by general assistance payments one finds that six of the ten leading areas are in California, and all six are in the Central Valley. The areas are Visalia, Fresno, Modesto, Stockton, Yuba City-Marysville and 1 Redding. For those of you not familiar with California these cities are the major agricultural centers of the Central Valley.

What a paradox! The greatest irrigation projects ever constructed, and the people who work on the farms that these projects irrigate suffer from the highest degree of poverty that our Census can detect. It is this offense to human dignity that brings me before you today.

It is not my purpose to discuss the intent of Congress or describe the intricate legal details of the law. Rather, I will simply be reporting our findings concerning current farm size patterns and other issues that are directly related to Reclamation Law.

(RRA) that the Federal Government would begin to collect substantial repayments of operating costs and capital fund expenditures on Federal water projects constructed in the West. By requiring farms irrigated with Federal water that exceed 960 acres, or farms leasing more than 160 acres from a single owner, to pay full water costs, as opposed to lower, subsidized rates on smaller farms, it was expected that the multi-billion dollar Federal projects would realize repayments that could, in principle, help our nation reduce its debt load.

According to a study conducted by the Bureau of Reclamation, out of 47,638 farms in the West eligible to receive Federal water just 2.5% exceed the 960 acre limit. However, due to their large size, these farms comprise nearly one-third of all land receiving Federal project water. That is, they farm 2.65 million acres, or 31.3%, of the total of 8.45 million acres eligible for Federal irrigation water.

It has also been established that 90% of all landholdings subject to the acreage limitation provisions of Reclamation Law are located in California. From this it is clear that that the effectiveness of full-cost pricing rules will be tested by the degree of compliance in California.

1. California farms receiving the Federal water subsidy are, on average, 7.2 times larger than the average irrigated farm.

The California Institute for Rural Studies has determined the actual size distribution of California farms eligible to receive Federal water in a carefully constructed sample of ten 5 California water districts. Some 1.1 million acres are

represented in the 1985 study, conducted before proposed rules for the enforcement of the RRA hammer clause were published. Our Our findings are summarized in Table 1 below.

Farm Size Distribution, Land Eligible for Project Water
Ten California Districts, 1985

| | <u>Fa</u> | rms | <u>Irriga</u> | <u>ble Land</u> |
|--------------------|---------------|-----------------|---------------|-----------------|
| <u> Size Class</u> | <u>Number</u> | <u>Per Cent</u> | Acres | Per Cent |
| 80 acres or less | 534 | 29.8 | 20,632 | 2.0 |
| 81-160 acres | 284 | 15.6 | 37,042 | 3.6 |
| 161-320 | 317 | 17.7 | 77,924 | 7.6 |
| 321-640 | 282 | 15.7 | 133,047 | 13.0 |
| 641-960 | 145 | 8.1 | 117,207 | 11.5 |
| 961-1,280 | 64 | 3.6 | 70,611 | 6.9 |
| 1,281-2,560 | 94 | 5.2 | 167,971 | 16.5 |
| 2,561-5,120 | 44 | 2.5 | 153,539 | 15.1 |
| 5,121 acres or mo | re 27 | 1.5 | 241,900 | 23.7 |
| Total | 1,791 | | 1,019,873 | |

Average = 569.44 acres/farm

Consideration of land farmed by all 1,791 of these farm businesses outside of the ten districts leads to a determination that their actual statewide holdings total some 1,877,286 acres of irrigable cropland. On this basis we conclude that their average holdings amount to 1,048 acres per farm, making them 7.2 times larger than the average California irrigated farm. The average holding of an irrigated farm in California is just 145 acres of irrigated land. Clearly, the Federal water subsidy, whether by design or otherwise, has preferentially benefited the state's largest farm businesses.

Those farms with more than 960 acres eligible for Federal water comprise just 229 of the total of 1,791 farms in the ten district study area. However, they farm 634,021 acres of the total of such land in the ten districts. That is, at least 62%

of the land eligible for Federally subsidized water in these districts is in farms exceeding 960 acres.

2. Westlands Water District farm operators have an amount of irrigated cropland equal to 24.2 times the average California irrigated farm.

The largest water district in the United States is the Westlands Water District (WWD) in California's San Joaquin Valley. Comprising some 944 square miles (nearly the size of the state of Rhode Island) this district has been the focus of controversy since its formation thirty-five years ago.

Our results for the size distribution of Federally irrigated land in the Westlands district are shown in Table 2.

Table 2
Farm Size Distribution, Land Eligible for Project Water, WWD, 1985

| | <u>Fa</u> | rms | <u> Trriga</u> | ble |
|-------------------|---------------|----------|----------------|----------|
| Size Class | <u>Number</u> | Per Cent | Acres | Per Cent |
| 80 acres or less | 9 | 2.0 | 375 | 0.1 |
| 81-160 acres | 33 | 11.1 | 4,734 | ŏ.5 |
| 161-320 | 39 | 13.1 | 10,337 | 2.0 |
| 321-640 | 43 | 14.4 | 22,072 | 4.3 |
| 641-960 | 50 | 16.8 | 42,079 | 8.2 |
| 961-1,280 | 20 | 6.7 | 22,458 | 4.4 |
| 1,281-2,560 | 50 | 16.8 | 91,397 | 17.8 |
| 2,561-5,120 | 30 | 10.1 | 104,934 | 20.4 |
| 5,121 acres or mo | re 24 | 8.1 | 215,637 | 42.0 |
| Total | 298 | | 514,023 | |

Average = 1,724.91 acres/farm

Consideration of the California-wide holdings of these 298 WWD farm operators shows that their total holdings of irrigated cropland amount to 1,045,285 acres, twice the amount of their holdings of Westlands land irrigated with Federal water. As shown in Table 3 below, this result demonstrates that the average

holdings of irrigated cropland of Westlands Farm operators is 3,058 acres, or 24.2 times larger than the state average.

Table 3

Comparison of Westlands Farm Operators With All California Irrigated Farms, 1985

Irrigated Land per Farm 145 acres

WWD Farm Operators
Farms 298
Irrigated Land (acres) 1,045,285

Irrigated Land per Farm 3,508 acres

The 124 farms with more than 960 acres of cropland irrigated with Federal water account for 84.51% of the Westlands land eligible for project water. This is the largest fraction found for any of the ten districts we have examined in detail.

3. Multiple legal entities under common operation are being created to avoid full-cost payments under Reclamation Law.

Substantial evidence is now available to demonstrate that, in response to RRA regulations, multiple farm entities have been created that effectively evade the full-cost payment requirements of the law. Just prior to publication of final rules to implement the acreage limitation provisions of RRA, USDA offices received a torrent of applications to divide existing large-scale farms into smaller units. Such farm reconstitutions must be approved by USDA if the new farms are to qualify for USDA program payments. Normally, farm reconstitutions pertain to a division of existing farms when, for example, a parcel is sold or when a parcel lease changes hands. In a typical year, the Fresno

County, California, ASCS office of USDA will handle a volume of such farm reconstitutions that has filled about one-half of a file cabinet drawer. This year, in response to the prospect of having to pay full-cost for just a portion of the irrigation water they typically use, the volume of farm breakups handled by the Fresno ASCS office has exceeded the ability of the ASCS staff to handle the paper work. Though the year is not yet over, the volume is thirteen times greater than has been typical in years in the past, filling five full file drawers with documents and another one and one-half drawers of material await processing.

a. Vaquero Farms, Inc.

USDA records for farm operations participating in price and income support programs provide substantial details of farm size and location for most farms receiving Federally subsidized water. Seven distinct legal entities that are, in fact, closely interrelated are described below. Table 4 shows their name and irrigated cropland acreage.

Table 4
Vaquero Farms Legal Entities, 1985

| <u>Name</u> | <u> Irrigated Cropland</u> (acres) |
|--|---|
| Tony & Ann Costa Larry J. Enos Cindy Pruett Trust Gregory Pruett Trust Kelley Pruett Trust Stacy Pruett Trust Louis B. Souza | 1,006 589 945 902 956 966 915 |
| Total | 6,279 |

Each of these "separate farms" reports the same address to USDA. Six of them made an irrevocable election, as landholders, to be subject to the pricing provisions of RRA. The grouping of their

respective sizes at or below 960 acres was not an accident. In fact, of the 6,279 acres being farmed only 63 acres were subject to full-cost pricing.

The land being farmed by these entities is all located in western Fresno County. As shown in Figure 1, the land farmed by these entities fits together like pieces of a jigsaw puzzle.

A search of records at the WWD offices shows that each of the seven entities is a "separate" water user but all report the same address, telephone number and name of contact person. A telephone call placed to that number resulted in the greeting "Hello, Vaquero Farms". Vaquero Farms, Inc., a California corporation, reported farming all of the land now farmed by these entities just prior to the passage of RRA.

Corporate records reveal that Ann Costa and Louis Souza are sister and brother, and that they, various family trusts, and Larry Enos are the sole stockholders of Vaquero Farms, Inc.

Further, Souza or Costa are trustee of each of the trusts identified in Table 4 above. It can hardly be an accident that each of these seven farms was formed at same time subsequent to the passage of RRA and that they have managed to arrange to have just 63 acres, out of the 6,279 acres involved, subject to full-cost pricing.

Further evidence regarding the nature of the relationship among these "farms" is provided by documents filed by them in connection with their bank operating loan. All of the documents list the debtor as "Vaquero Farms, Inc." while listing as additional debtors the various "farms" described above. Thus, while USDA and WWD records suggest seven "independent farms",

their bankers are not so easily fooled. The banks realize that it is a single operation conducted by Vaquero Farms, Inc., and insist that their credit records reflect that fact. Copies of these documents are shown as Figures 2-8.

Finally, the directors and officers of Vaquero Farms, Inc., are Louis B. Souza, President; Larry J. Enos, Vice-President; Tony L. Costa, Vice-President; Ann P. Costa, Chief Financial Officer; and James W. Hannum (trustee of another family trust).

While each of the entities is regarded as a "qualified recipient" of tax-payer subsidized water by the Bureau of Reclamation, they form a single farming unit as they did before the passage of RRA.

b. The Allen Ranch

A representative example of the kind of changes that are now restructuring farms in the Westlands Water District is the case of The Allen Ranch, a California corporation. Let me quote to you the explanation offered for the proposed farm reorganization at the Allen Ranch operation. In a letter to USDA dated March 23, 1287, Mr. Bob Viets, the ranch manager states,

"Due to the impending requirements of the Reclamation Law, The Allen Ranch and The Allen Ranch Partnership has had to reorganize and formulate six new farming entities. These six new entities are to be evolved from the two Allen farm identification numbers, 709 and 618. Listed below are the following new entities

- 1.) Pleasant Valley Farms (Partnership)
- 2.) Allen Land & Cattle Co (Partnership)
- 3.) Turk Station Farms (Partnership)
 4.) Stanley Station Farms (Partnership)
- 5.) Dorothy M. Allen Ranch (Sole Proprietorship)
- 6.) Buster Allen, Inc. (Corporation)

We summarize the overall findings regarding The Allen Ranch in

Table 5 below. The situation is a little complex in that a major portion of The Allen Ranch is located within the Westlands Water District but involves land that is not irrigated with project water, a decision made by the landowners (Southern Pacific and Chevron). However, some 3,113 acres of the total operation are irrigated with Federally subsidized water. Thus, to deal with both the 960 acre limit as well as the "hammer clause" of RRA it is necessary for the farm operation to have no more than 160 acres leased from each landowner in each of the six new entities as well as keep the total amount of land irrigated by project water in each entity under 960 acres.

Table 5
Legal Entities of The Allen Ranch
1987 Farming Operations

| <u>Name</u> | Total Cropland | WWD Land-Project Water |
|---|--|--|
| Buster Allen Inc. D.M.A. Ranch Pleasant Valley Farms Allen Land & Cattle Co Turk Station Farms Stanley Station Farms | 3,358 acres 1,381 1,319 995 1,388 1,084 | 190 acres 401 671 676 720 455 |
| Total | 9,524 | 3,113 |

The current Water User Directory of the Westlands Water District lists the same address, the same phone number and the same contact person for each of the six entities. No effort is made to hide the fact that the six legal entities are actually operated by The Allen Ranch.

The names of the partners of the four partnerships among the six entities are shown in the Fictitious Business Name statement on file with the Fresno County Clerk. See Figure 9 attached. In all cases the four partners are identical.

c. Other examples in the WWD.

As indicated previously, the Fresno County ASCS office has been overwhelmed with proposed divisions of large-scale farms as a result of the desire to achieve legal entitities that are within the 960 acre limit. Table 6 summarizes a few of these.

Table 6
Divisions of Large WWD Farms, Fresno USDA

| Parent Farm Acr Cinco Farms, Inc John F. Bennett Britz Inc Carvalho Errotabere Five Points Ranch B E Giovannetti Gragnani Pacific Farms Co Cantua Farms Coit Ranch Brughelli Farms | 7,022 4,574 17,456 1,587 3,087 4,655 1,857 12,472 6,445 7,909 1,883 1,838 | of Entities 13 5 8 2 2 4 2 5 9 8 3 4 | Reason "960 Law" "960" "960 Law" "Bureau Law" "960" "960" "960" "960" "060" "060" "060" "060" "060" "060" |
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Source: USDA Form ASCS-155, Data For Farm Reconstitution, Fresno County ASCS of USDA.

In the examples cited above some 75,432 acres have been divided into 70 legal entities.

4. Unless Congress acts to correct this situation the vast majority of land being operated in units exceeding 960 acres will escape payment of full-cost rates.

According to Westlands Water District records, just 68,100 acres of WWD land are now subject to full-cost water rates under terms of the RRA. We found in 1985 that 434,426 acres of WWD land was in farms exceeding 960 acres. If the 1985 farm structure had remained intact then about 261,811 acres would now be required to pay full-cost. However, as a result of the farm restructurings illustrated above, there are now 282 "new farms"

in the WWD bringing the average amount of land receiving project 16 water to an amount just under 960 acres. As a consquence, just 26% of the land that would otherwise be required to pay full-cost (68,100/261,811) is now required to do so.

The farm operators of the Westlands have been rather frank in their attitude concerning this matter. In a newspaper interview one WWD farm operator, Steve Lowe, described his plans.

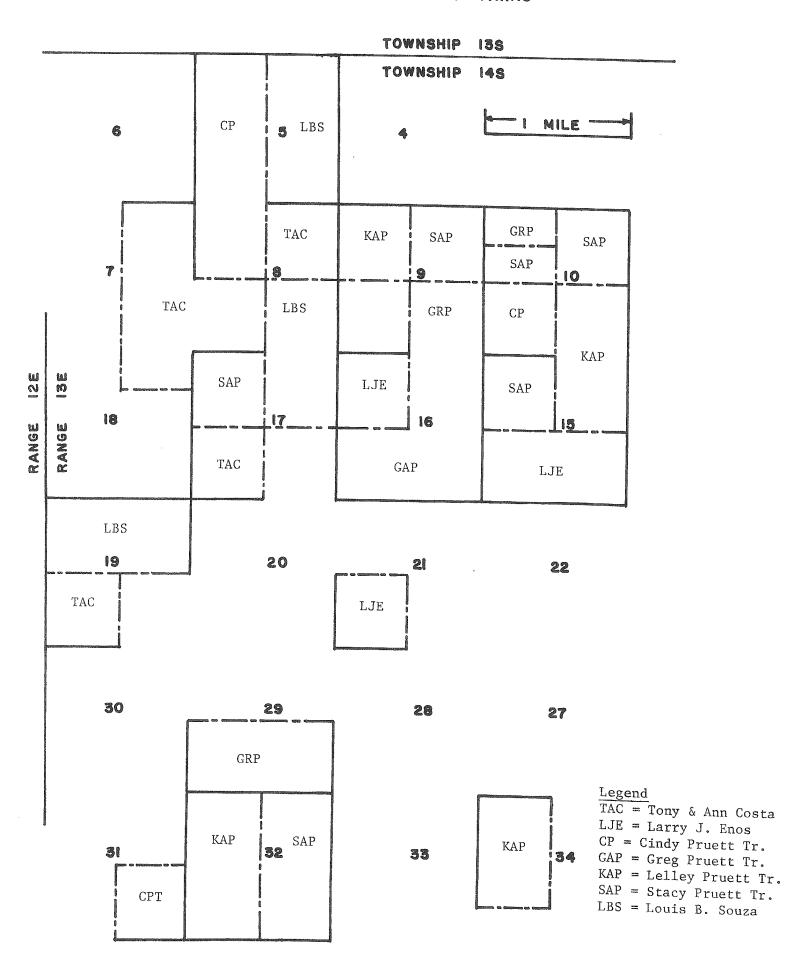
"`It had been one farm with all the earnings coming into one pot,' said Lowe. `Now each of the five farms will have its pot.'

Not everything will be separate, however. The Lowes also plan to set up a joint `farm management' company to own and run the large equipment that tills the soil and harvests the cotton, tomatoes and other crops." (17)

Thus, the issue before you is a simple one. Is it appropriate for these large-scale farm businesses to simply harvest a crop of paper farms and continue business as usual, or should they be required to pay full-cost for water used to irrigate their huge farms? It is clear that they have the legal expertise to create as many "paper farms" as needed to stay within the limits of the RRA. But this is not the intent of the law. The public and their representatives should not accept it.

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- 5. D. Villarejo, <u>How Much Is Enough?</u>, California Institute for Rural Studies, Inc., Davis, CA, 1986.
- 6. U.S. Department of Commerce, Bureau of the Census, <u>Census of Agriculture</u>, <u>California</u>, <u>State and County Data</u>, Washington, DC, 1982.
- 7. ibid.
- 8. U.S. Department of the Interior, Bureau of Reclamation, Letter from Forrest D. Coleman to Hamilton Candee, September 10, 1985. See enclosure titled "Landholders Subject to Discretionary Provisions of RRA."
- 9. California Department of Corporations, File No. 700-5671, Vaquero Farms, Inc.
- 10. Financing Statements filed by Vaquero Farms, Inc. Fresno County Official Records, No. 85009867, 85009868, 85009869, 85009874, 85009875, 85009876, 85009877.
- 11. California Secretary of State, Statement of Officers and Directors, Vaquero Farms, Inc., Corporation Number 538118.
- 12. Fresno County ASCS Office, 1987 Farm Reconstitution #736, The Allen Ranch, Letter dated March 23, 1987 from Mr. Bob Viets.
- 13. Westlands Water District, Water Users Directory, April 1987.
- 14. Fresno County Clerk, Fictitious Business Name Statement, File Number 87-37758.
- 15. Westlands Water District, News Release, July 31, 1987.
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- 17. San Francisco Chronicle, April 2, 1987, "Family Cuts Up Its Farm for the Subsidy."



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| WELLS PARGO BANK, N.A. TYPK OF PRINT HAMELE OF RECHESE PARTYLISE 11. Return copy to: HAMM ABBRESS Wells Fergo Bank, N.A. CITY P. O. Box 949 | JAN 3 1 1985 FREENO COUNTY CALIFORNIA GALEN LARSON, COUNTY ROCONSON Anita Skinagetty FEE 8 |

| This FINANCING STATEMENT is presented for filing pursuant to the | California Unit | form Commercial Cada |
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| VAQUERO FARMS, INC. | | 1A SOCIAL SECURITY OF PERSON TAR CO |
| M C M AND A PRINCE | Carlos Company of the | 94-1661546 |
| 121 R 11th Ctract | 77. 674 G | 10 20 0002 |
| ADDITIONAL DESTOR (IF ANY) ILAST NAME PIRST-IF AN INDIVIDUAL) | Tracy, CA | 95376 |
| DNOS: LARRY J. | | ZA SOCIAL SECURITY ON PROSENAL TAN MO |
| MAILING ADDRESS | ITV DTATE | 564-72-1625 |
| DESTOR'S TRADE NAMES OR STYLES (IF ANY) | Tracy, CA | ²⁰ 95376 |
| | | BA PERSONAL PAS DUMBER |
| SECURED PARTY | | |
| wante Wells Fargo Bank, N.A. | | SA SOCIAL SECUPITY ON PERSONAL TOS TO THE DATE TRANSPIT AND A SA SE |
| MAILING ASSESSED P. C. BCZ 949 | | WFB 250 |
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| This FINANCING STATEMENT covers the following types or items of property (I | TO COME | |
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TRESNO COUNTY

RECORDERS OFFICE

| THE PRANCING STATEMENT IS 1009874 | _ | | - S |
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| This PINANCING STATEMENT is presented for filing puresions 1. BESTOR (LAST DAME PROTT-OF AN INDIVIDUAL) | to the Colife | ormis Uniform Commercial Code. | |
| VAQUERO PARMS, INC. | | TA. COCIAL ESCURITY OF PERSONAL YAS | nog- |
| 18. HAILING ADDRESS | 100 | 94-1661546 | |
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| State of the state | Trac | y, CA 20 35376 | |
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| S. ASSIGNEE OF SECURED PARTY (IF ANY) | EIP COS | 95353 | |
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| located and owner of record when required by instruction 4). | And I A CHARLES | a contribution of Local broboth on m | |
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JAN J | BOO

RECORDERS OFFICE

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| 1. DESTOR (LAST MADE PROT IP AN INDIVIDUAL) | and to the Controlling Uniform Commercial Code. |
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| VAQUERO FARMS, INC. | 1 A SOCIAL DECUSITY OF FEDERAL TAE INC |
| 18. MAILING ADDRESS | 94-1661546 |
| 121 E. 11th Street | 1C. CITY, STATE 1D SIP COSS |
| 2. ADDITIONAL DESTOR (IF ANY) (LAST HAME PIEGT—IF AN IMPRIDUAL) | Tracy, CA 95376 |
| CRECORY ROBERT PRUETT TRUST | 24 POCIAL BECURITY OF PEDERAL TAN BO |
| 28. MAILING ADDEESS | 94-6514162 |
| | 2c civ. state Tracy, CA 20 17 cop4 |
| 3. DESTOR'S TRADE NAMES OR STYLES (IF ARY) | |
| | JA PEDEBAL TAR RUMBER |
| 4. BECURED PARTY | |
| water Wells Fargo Bank, N.A. | AA SOCIAL SECUSITY DO PEDEDAL TAR DO OR SON TORNSIT AND A D A DO |
| MAILING ABONESS P. O. BOX 949 | |
| OTY Modesto STATE CA | WFB 250 |
| B. ASSIGNEE OF SECURED PARTY IN ANY | 210 cook 95353 |
| MAME | SA SOCIAL DECUBITY DO FEDERAL TAN DO DE BO |
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| CITY | M |
| This FINANCING STATEMENT covers the following types or items of pro- lecuted and owner of record when remained by instruction (A) | ZIP CODE |
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| IF APPLICABLE 7A ARE ALSO COVERED (1) | (2) (3) (4) |
| 8. CHECK DESTOR IS A "TRANSMITTING UTILITY" IN ACCO | |
| on the Sound President x Ann P. Costs. Truste | OATE TIME FILE NUMBER |
| VAQUERO FARMS, INC. GREGORY ROBERT PRUETT TRU | UST 1 RECORDED AT REQUEST OF |
| My 16th | 3 |
| Marry Scheidt, VP | AT 16 MIN PAST 37 N |
| Y | |
| WELLS PARCO BANK, N.A. | 5 JANS 1 1985 |
| TYPE OR PRINT HAME (B) OF RECURER PARTY (188) | |
| 11. Return copy to: | CARSON, COMPA PROPERTY |
| MANNE " ASSESSE Wells Fargo Bank, N.A. CHY P. O. Box 940 | BY CEPUTY RECORDER |
| | / |
| STATE Modesto, CA 95353 | |
| (I) FRINC OFFICER COPY FORM UCC.1—FILING FEE Approved by the Secretary | E 83.00 |

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| AQUERO PARES, INC. | | | | THE RESERVE THE PARTY OF THE PA | | |
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| wells Fargo | Bank, N.A. | | SA BOCIAL GECABITA DO | PERERL TARRO | | |
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| DO NOT PUBLISH INSTR | | THE FOLLOWING | | | BUSINESS AS: | | | |
| Insert the fictitious business name(s) and the street address of the principal place of business in | | FICTITIOUS BUSIN | VESS NAME(S): (T | /pe or Print) | | | | |
| California. | | Pleasant V | /alley Farm | s | | | | |
| If no place of business in California, if August 25 at the purposed place of business. | | Turk Stati | | | | | ******* | **** |
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| NOTE only those businesses operate | | Street Address, 19.0. | Box not accentable) | | City: | | Ctata | - |
| address may be listed on one state | ment. | 24500 Phel | | | Coalin | ıga | State: CA | 93210 |
| If an individual, insert full name | and residence 2 | FULL NAME OF REGI | | | | i | <u> </u> | - 1 |
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| • If a business trust, insert full name | and residence | | ind Karen A | | | | | |
| address of each trustee.If a corporation, insert the name of the | 207027010000 | Residence Address: [i | | | | | | |
| set out in the articles of incorporation | | 24600 Phel | | ma. | City: | | State: | Zip Occe |
| incorporation. | | FULL NAME OF REGISTRANT: [Type or Print] Coalinga CA 93210 | | | | | | |
| Attach additional pages if necessary | y. | Ross M. Al | | • | | | | |
| | | Residence Adaress: [I | P.O. Box not accepta | piel | City: | | Canan | |
| | | 1160 Lakev | ille Circle | e | Petalu | ıma | State: CA | Zip Coce 94952 |
| Enter Date | 3 | Registrant commenced | to transact business: | under the Finting | | | | 124225 |
| • Check "Not Applicable" if regis | trant has not | | | | | | | |
| commenced to transact business at | time of filing. | NOT APPLICAE | ILE XX on (D | ate): Februa | ary 1, 1987 | r | | |
| | 4 | | | | | | | |
| Check statement which best describe | L | THIS BUSINESS IS CO | NDUCTED BY: | | | | | |
| the business(es). | : : - | An Unincorporated Association Husband and Wife | | | | | | |
| NOTE: Check ONE only. | | A Limited Partnership Other than a partnership Joint Venture | | | | | | |
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| guardian, conservator, executor, assignee or purchaser. See all special | | | MENT HAS BEEN EX | | JANT TO SECTION | 17010 OF TU | C Buone | |
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| | 6 | Type or Print Signature |): | Sig | ned: | | | |
| If an individual, must be signed by individual. If a partnership or other association of persons, must be signed by a general partner. | | James S. A | llen | | Jan - | 100 | | |
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| • If a business trust, must be signed by a trustee. | | TITLE: (For other than | individuai) | | | | | |
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| Title of Officer. | | ocherar Fa | r cher | | | | | |
| | 7 | THIS STATE ENT FIL | ED WITH THE EBES | NO COUNTY | MOTICE. | | | |
| This item for use of the County Clerk Only. DO NOT INSERT DATE. | | CLERK ON FEBR GALEM GARSON, CO | UARY 26 .a | 1987 | NOTICE: THIS 12-31-1 | 992 | EXPIRES | ON: |
| DO HOT INGUIT DATE. | | TIMIC | 120 A | Mala | EXPLATION DA | I MUST BE P TE NO FUE | Ell ED ppic | 10 TO T - |
| The state of the s | | - CERNESTI | NE R. MOR | TALES | ENTERNATION WILL | BE GIVEN. | | DELOE DE |
| [SEAL] | [S | pace Below for L | Jse of County C | Clerk Only, I | Do Not Publish | Certificat | tion? | - |
| | 1 | | CERT | TIFICATION | 1 | | - | |
| | I hereby | certify that the t | foregoing is a c | correct copy | of the original | on file in | mv offi | CB |
| | | | GALEN | LARSON, C | OUNTY CLERK | | | |
| | Dated: Fresno. | California | By | | | | | _ |
| |] | | And the second s | or any manager and hand, then the first become a property of the | | | | _ Debatk |

Attachment

87-37758

FULL NAME OF REGISTRANT:

Jennifer A. Bailey

RESIDENCE ADDRESS:

31611 Pennyroyal Lane Prather, California 93651