

**U.S. DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

Valley Meat Company, LLC)	
)	
Plaintiff,)	
)	
v.)	
)	
TOM VILSACK, Secretary)	
U.S. Department of Agriculture)	
1400 Independence Ave., SW)	12-CV-1083-JCG-CG
Washington, DC 20250)	
)	
AL ALMANZA, Administrator,)	
Food Safety and Inspection Service)	
U.S. Department of Agriculture)	
1400 Independence Ave., SW, Room 331-E)	
Washington, DC 20250)	
)	
Defendants.)	
)	

**AFFIDAVIT OF BILL BULLARD IN SUPPORT OF
RANCHERS-CATTLEMEN ACTION LEGAL FUND, UNITED
STOCKGROWERS OF AMERICA'S
MOTION TO INTERVENE**

STATE OF MONTANA)
) ss.
COUNTY OF YELLOWSTONE)

I, Bill Bullard, being duly sworn upon oath hereby depose and state as follows:

1. I am over the age of 18 years, and have personal knowledge of the facts contained herein.

2. My address is P.O. Box 30715, Billings, Montana 59107.
3. I am the Chief Executive Officer of Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America ("R-CALF USA").
4. R-CALF USA is a national, nonprofit trade association incorporated in the state of Montana that exclusively represents the market interests of live cattle producers within the multi-segmented United States beef supply chain. R-CALF USA's voluntary members include thousands of United States cattle farming and ranching business owners located in 45 states that are involved in all stages of the cattle production process, including seed-stock producers, cow/calf producers, stockers and backgrounders, and feedlot owners.
5. On numerous occasions during the past decade, R-CALF USA has testified before Congress and federal agencies on domestic and international issues that affect the profitability of its cattle farmer and rancher members. R-CALF USA also has represented its members in litigation in a variety of cases involving the U.S. live cattle industry including *Ranchers Cattlemen Action Legal Fund United Stockgrowers of Am. v. United States Dep't of Agric.*, 359 F. Supp. 2d 1058, 1062 (D. Mont. 2005); *Ranchers Cattlemen Action legal fund United Stockgrowers of Am. v. United States Dep't of Agric.*, 415 F.3d 1078 (9th Cir. 2005); *Ranchers Cattlemen Action Legal Fund United Stockgrowers of Am. v. United States Dep't of Agric.*, 499 F.3d 1108 (9th Cir. 2007); and *Ranchers Cattlemen Action Legal Fund United Stockgrowers of Am. et al v. United States Dep't of Agric.*, 1:07-cv-01023-LLP (S. Dak. 2007).
6. R-CALF USA has members that own, breed and train horses, rely on horses to conduct their cattle business operations, and use horses for recreational, sporting and event purposes.
7. R-CALF USA's voting members are members who own cattle. R-CALF USA's organizational policies are developed first by a resolution nomination process that entails a vote of its members that physically attend the organization's annual business meeting. Second, all resolutions nominated by a vote of the members attending the organization's annual business meetings are then mailed to every voting member of R-CALF USA in a mail-out ballot. Only those resolutions that receive a majority vote of all voting members of the organization become the official policies of R-CALF USA.
8. In 2008, the majority of R-CALF USA's voting members adopted by affirmative vote an official organizational policy that states "the horse slaughter ban is creating an economic hardship on horse owners and an

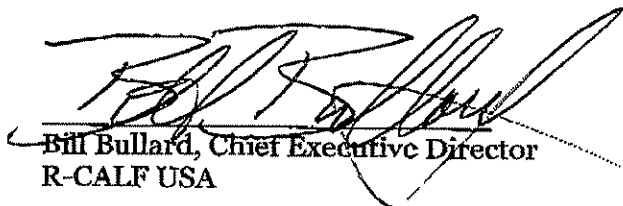
ecological hardship on private and federal lands," and, therefore, "R-CALF USA supports abolishment of the horse slaughter ban." That official policy has not been amended, rescinded or otherwise changed since its 2008 adoption.

- 9. Based on information and belief, domestic horses are currently being purchased for slaughter in the United States, transported over extremely long distances, and then slaughtered in Mexican slaughtering plants that are not subject to the humane livestock slaughtering standards that are required by the United States Department of Agriculture ("USDA").
- 10. Based also on information and belief, R-CALF USA has members who have ceased marketing their unusable horses to Mexican horse slaughter buyers due to concerns that their horses would be subjected to undue stress during transit to foreign horse slaughter plants and then suffer inhumane slaughtering techniques once they arrive at foreign slaughtering plants. As a result, R-CALF USA has members who are without a viable economic and humane means of disposing of unusable horses, which creates for them an economic hardship.
- 11. Based further on information and belief, the majority of R-CALF USA members believe that a USDA-inspected, domestic horse slaughter facility, such as that proposed by Valley Meat, LLC, which would be subject to United States' humane slaughtering standards, would alleviate the inhumane treatment that domestic horses are now subjected to in foreign horse slaughter plants and would alleviate the economic hardship suffered by those R-CALF USA members who refuse to subject their unusable horses to such inhumane treatment.

FURTHER AFFIANT SAYETH NAUGHT.

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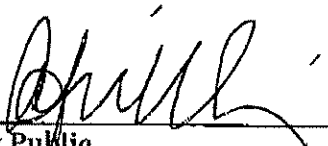
DATED this 19th day of February, 2013.


Bill Bullard, Chief Executive Director
R-CALF USA

STATE OF MONTANA)
) ss.
COUNTY OF YELLOWSTONE)

The foregoing instrument was subscribed and sworn under oath before me by Bill Bullard, this 19th day of February, 2013.

Witness my hand and official seal.



Notary Public
My Commission Exp: July 26, 2016

