

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:17-CV-01037**

FARM LABOR ORGANIZING)
COMMITTEE,)

r nts s n n n or - on | t A t r s t t s tt nt
r nts t t n st p t on t t n r t r p o p n

o pr s o t no non t ns n non t rs p o pr s r o
 or rs ro o or n n r t H A t por r r t r v s pro r
 st or rs' - A ton l t Fr A t s n n onst t ton B o Att n r
 s t s t v s n s o t n p n s s F C or ts or n n t v t -
 - n t o on on n n nt rr pr r l n n t on on
 t r t o r n pros ton n v n or nt nt s r sp t r q st
 pr n r n p r n nt n n t v r to ns r t t nt s n ont n
 to s n n t ro v o nt r p ro s ton r nts t r t r
 p o rs n nt F C n ts rs n nt r nto n n t ro
 s tt nt r nts t r t r p o rs-

JURISDICTION AND VENUE

- s Co rt s s t tt r rs t on p rs nt to --C-

or n n n n st r n o t_v r n n r nts| n t s D str t- n o

F₁[~] C's rs v n-or_v or n t s D str t

o n t s n to r n p r t p n t s n t r t r s p p n to t r to
 p r q v or n o n t o n s o r r v or r s - F - j C r r n t n s t r s o t v
 r n n r n t s q r n o t | r v or r s n o r t C r o n n s
 t v o r n n t o n r s t s r s p n p r s n v o t v r n n
 r n t s t r o o t t s t t - F - j C r r n t n t n s o s n D | o r t
 C r o n o d o n o n t r r | n t s t t o v o j . o n l o -
 - n t t o r o o n s v n v or o n r n D r
 C o n t | o r t C r o n r n t r t r s s o n t p r n t
 n o t s s t - n t o o n s s n n t o n n v or s n o r t
 C r o n n r n r t r s t o r r ' v s t o r - - C -
 5 H | o o n r r r t o s n H | A v s - ' F o r n r t n t r s d
 r - o o n s s v or n o r t C r o n v t n t o o r o n
 o p r t o n s o r s v r o n t s o t o r - n t o o n s s r o
 F - j C n | s n 5 | s t o r s o r t C r o n p
 n o j r

- nt nt n A_v r o H rn n v n _v or on r n
 to s Co nt | ort C ro n rn t r tr s son t
 pr n t n o t s s t- nt A_v r o H rn n s n n ton n
 s_v or s n ort C ro n n r n H₁ A_v s -For t p st t r rsl r-A_v r o
 H rn n s_v or n ort C ro n v t n-or to o r_v n op r t ons
 or s_v r ont s o t o r- nt A_v r o H rn n s r o F₁ C
 n | s n | s t or s ort C ro n p o rs to t_v s o
 5 o s rn n s ro s p n to tr ns r s s r t to F₁ C-H_v n
 s ss o p t t s_v or nt s sonl nt A_v r o H rn n p ns
 to r s s r nt r t to r t rn to ort C ro n to_v or n tr r t r
 s sons- nt A_v r o H rn n _v nts to nt n s F₁ C rs p
 t or n s p o rs to t n on s ro s_v s n tr ns r t s s
 r t to F₁ C-

Defendants

- D n nt t n s s n s o p t st Attorn G n r o
 t t t o ort C ro n - rs nt to -C-G n- t t- 5 | | 5 | 9 | 5 | | n 5 | |
 t t s o t Attorn G n r n t t ort to n_v st t n to r n
 n v pros t p rsons n orpor t ons or nt rn nto r nts n r str nt o
 tr or o r -D n nt t n s p rson_v t nt n n o ---C- 9
 n_v s t n n r o o r o s t t _v t t s r v nt to t s o p nt-

- D n nt rr n s s n s o p t s t D r tor o t
ort C ro n A n str t_v o t Co rts CA[~]C - rs nt to -C-G n-
t t- A₁ | A₁ | n A₁ | t D r tor o t CA[~]C s t n str t_v

- B s r t r Ψ or s s son n r Ψ or rs r o on p

- $\tilde{v} r \mathfrak{D}$ o ort C ro n $r_{\mathfrak{V}}$ or rs r o H sp n - \downarrow t no s nt-
 ost o ort C ro n 's $r_{\mathfrak{V}}$ or rs r o n n ton or n n sp p ns
 s t r rst n -
 - n ontr st to t r p o s \downarrow $q r \mathfrak{D}$ o n v $s_{\mathfrak{V}}$ o op r t ort

t n r s A t l o r t A t l n t o n t o r t o n s A t r n t n t
 9 s l r or r s r r o o s t o t p r o t t o n s o r t s s-
 r n r o n o t o s p r o t t o n s t o -
 5 - n o r t C r o n l r or r s r s s t n t r o s t t
 n | q r t | or r s' o p n s t o n l n o t p o n t s-
 - r s p s t o r v n t t t s s o n s r o t v t | t
 s t n p r t s t o r s' r n s s t t s s t n t p o r t o n s o t or or
 r A r n A r n - n o t s r | o t v t s o n s r n t n s
 o r t C r o n ' s r t r or or p r o n n t t n o-

FLOC's Work in North Carolina

- n t F C s r or r n o n o p p r o t | s p n
 r s n t o n | r o n o o or n o r t C r o n - F o r q r t n t
 r s l F C s n t o n n o n o r n n n

r r st ro o tt st t - n ⊥ CGA sponsor ppro t o t
H₁ A_v s s n r_v H₁ A_v or rs_v or n t st t - or t n 9 o t F₁ C
rs q_v r n r t CBA_v t t CGA r H₁ A st_v or rs-
- F r_v or rs r pt ro t r t on ⊥ or t ons A t-
r s no r or st t v r q r n n on t onsl nor n ot r_v t t r q r s
n tor r o n t on o r_v or r n ons- r or | CBAs st n t_v n
F₁ C n r t r p o r s n ort C ro n r nt r nto on n n tr
v o nt r s s-

5 - CBAs prq_v s n nt n ts or t r_v or rs q_v r t
r ntsl s s r nt o r_v sl n or r n r pro ss or r r t nt
n r n | n r_v n pro r - CBAs sp prq_v t t_v or r_v o
s ts tor o p ts s or r t r o p o nt or n r t r pro r s
r t to r t r n t o o_v n s son- s st p t on r st oo t t_v or rs
v r t t nst or o p n n o t ns or v_v or n on t ons-
r r t nt pro ss st s t CBAs s so r n t t
pr t o H₁ A st_v or rs n r r r t nt s or ss to o s n ort
C ro n -

- CBAs so prq_v s n nt n ts or r t r pro rsl
n n ns r n ons st nt p o nt pr t s on r ro p o r t r

n rp n Ψ or rs n r Ψ n pro r n n n t rn t Ψ sp t
n s s n n t pot nt or ost t t on -

Ψ - $F_{\downarrow}^{\sim}C$ s p rs n s r CBAs n ot r pr Ψ nts to
r Ψ or r on t ons t ro Ψ r o s str t s \downarrow n n p p ns n n
or n str tors to o orpor t onsl n ss st n ts rs n r n n
 Ψ | p t t on to n po nt pr t s-

- \sim n o s onl $F_{\downarrow}^{\sim}C$ s so p rt p t n Ψ s ts s p rt to p rs
ss s o port n to ts rsl s s n s r ss n Ψ t r t
r D p rt nt o \downarrow or prop r r nst t r t ons Ψ rn n n Ψ s
or H \downarrow A st or rs- \downarrow s ts n Ψ $F_{\downarrow}^{\sim}C$ p rt p t sl or Ψ $F_{\downarrow}^{\sim}C$ ss sts ts
rs n r n n pr Ψ n r rr sl r nt to Ψ t n ns or
 $F_{\downarrow}^{\sim}C$'s rs n so to t t p o t t Ψ or n on t ons on ront
r Ψ or rs-

9- B or t F r A t Ψ s n t | $F_{\downarrow}^{\sim}C$ ss st so o ts rs n
n ot t n or Ψ o nt r n on r o n t on r nts or n r nt or p n
o t Ψ r n n r ts s p rt o ss Ψ s tt nt o po nt r ts
t t on t t Ψ s $F_{\downarrow}^{\sim}C$ rs- n on s s | t n nt po r n
t p nt r Ψ or rs r t t t Ψ s n t r t nt r st to r so Ψ t s n
s tt nt r nt t t n po r r o n t on o $F_{\downarrow}^{\sim}C$ s t r n n
r pr s nt t Ψ o Ψ or rs Ψ o s n rs r n t r $F_{\downarrow}^{\sim}C$ rs p n
po r p to r n n tr on n on t on tt rs n ts Ψ or or s

o s r n t o r Ψ o \$ - = o r n r s r o p r o r Ψ o \$
p r o r Ψ o r \neq p o r o t t s t o r s s s t s s s Ψ o r r o s n | n
p o r o p t t Ψ n s s n o p t o n o n n t r n t Ψ s p t n s o r
r s o Ψ n Ψ o r p s p t s -

- $\tilde{F}_{\downarrow} \tilde{C}$'s t o t Ψ C B A s n t s t t | o n s t o p r n Ψ r
9 n t o t r n D r -

- D r n t p r o Ψ r C B A | $\tilde{F}_{\downarrow} \tilde{C}$ s t t Ψ n s t r t
C B A s t r o o t t s t t - A n s t r t o n t s n o n t o r n n s s s t n
 Ψ r Ψ o r r s Ψ t t r r t n t p r o s s n o o n t o r n r t r
p r o r s' o p n Ψ t t C B A s s s t n r s n o t r t Ψ o r r s
 Ψ t n r s t n n t C B A t r s n t r r t s n r t C B A t r n n Ψ o r r s o n
t r r t s n $\tilde{F}_{\downarrow} \tilde{C}$'s o r n n o r t s n s s s t n Ψ r Ψ o r r s n n n
p r s n r Ψ n s -

- n t o n $\tilde{F}_{\downarrow} \tilde{C}$ p r o Ψ s o t r s n n t s s s t n t o t s r s
n n s s s t n n r Ψ o r r s n t r s n n Ψ o r r s' o p n s t o n o r
o t r s o r n t s s s t n Ψ o r r s n t r s n o t n n o n s
o r r t o n o r p o n t t t r s n s s s t n Ψ t r p t r t o n o t r n s o

H | A $\tilde{F}_{\downarrow} \tilde{C}$ o r r s Ψ o p s s Ψ Ψ Ψ o r n n t $\tilde{F}_{\downarrow} \tilde{C}$ t t s -

- $\tilde{E}_{\downarrow} \tilde{C}$ n s $\tilde{F}_{\downarrow} \tilde{C}$ n s t r s C B A s n s s s t s t s r s t s o n s t n t
s n t o r n n Ψ r s n o r r t o s t r n t n t s r s' r n n p o Ψ d

prq on tons t r s not rr nt q r CBAs^d n r s st n r s or
 r_v or rs t ro o t t n str -
 - G_v n ts s st n t r so r s^d F_v[~] C s s n nt
 o st n s n ts st t_v CBA n str t on n or n n_v or -H_v A
 v_v or rs^d s_v s n ot r r nt r_v or rs^d t p v n so t | p o r_v
 o_v n or ps n r r r s t ro o t t st

n so t s not t osts o t s sl too sl or r p nts or o nsl r t
ro t r po s' v s to ns r t t p nts or r r rns t s r
ons st nt n r -

5 - | -n r t ort C ro n n Ho r A tl -C-G n- t t- 9 |
| t on n v rs on o v s t t po or s or r
n tl s s n on s or on t ons to r t sl s v t o nt or r t o t
propos t on s no v n n r pon n v n n t po r s v r tt n
t or t on ro t po v s s n on or or t p s or t
p p ro s ro v t t on s to n t s t r son or t
t on n st t s t t o r o nt or p r nt o v s v s
t ro on or or p s-

- n r v or rs to on F-1 C t s t v r tt n
t or t onl o p nt v t -C-G n- t t- 9 | 5 - | r q st n t t t r po r
t 5 o t r v v s n r t v r t s n s to F-1 C or t
p nt o n on s- s t or t ons or r t p ro t ons o s r
o on no v n s s o s-2'

9- -n r ort C ro n v pp to n str s or sl n on
s on t ro t p o v or rs v o n v n v o nt r
r to s t ons-Seed; -C-G n- t t- 9 | -

5 -

r

5 - F₁ C rr nt s o r t st rs n on p rt t st
r_v or n t ro o t t st t - ts rs p s_v sp rs |_v t rs
o t n r_v st rnl st rnl so t rnl n nort rns t ons o t st t -
55 - -n r t F r A t F₁ C's ntr nto r nts_v t r t r
pro rs t t pr_v or s o s or or t s tt nt o t t on r
r str nt o tr or o r |' _v o s t t to r_v st t onl r n
pros t onl n v n or nt t ons- -C-G n- t t- 5 | 9 5 | 5 -- p |

s n on tn p ns to pr ss r r tr

orpor t ons n pro rs to n ot t_v t_v or rs or tt r_v or n on t ons-

5 - n | F_v C_v on CBA_v t t ort C ro n Gro_v r's Asso t on
CGA t t q_v r n r d o t st t 's H_v A_v or rs-

5 9-

son F r n | or_v t t- s | st Sanchez Rodriguez, et al. v. Jackson
Farming Company of AutryvilleC_v - A t on - | C_v D E-D- -C-| n n
o rt_v t s tt nt n pt r - s tt nt_v s pr n r ppr_v
on n r | - n r v n ppr_v on | -
- As F_v C s n r s ts rs p n ort C ro n n p n
t n r o_v or rs _v r n on r nts_v n s ts rs v n
n_v o_v n_v | p t t on_v F_v C's or

nst p po n r str nt o tr or o r nt tt o ort C ro n -'

ort C ro n $\frac{1}{\sqrt{2}}$ s $\frac{1}{\sqrt{2}}$ | HB- $\frac{1}{\sqrt{2}}$ | 5 | o s -C-G n- t t-

§ 1-9 -

- s s t on $\frac{1}{\sqrt{2}}$ s nt n to n r n F $\frac{1}{\sqrt{2}}$ C's t to n $\frac{1}{\sqrt{2}}$ t

orpor t p r s rs o r t r pro ts n s r r nts t $\frac{1}{\sqrt{2}}$ o r nt

on 5 propos to n -G n- t t- 9 | 9 | to t t t
n r n o

An prq son t t r t or n r t on tons t
p r s o r t r pro ts | pro ts or t t r s o n
r nt ort p r s o r t r pro ts | ort t r s
o n r nt not to s or s tt t t on pon n
r t r pro r s st t s s n on or non n on p o r
or ntr nto or r s to nt r nto n r nt t or
n on or or or n t on s n n n or s
nst p po n r str nt o tr or o r nt
t t o ort C ro n -F rt d not t st n n G - 5 - |
n r ntr q r n n r t r pro r to tr ns r | n s
to or n on or or or n t on ort p rpos o p n
n p o 's rs p or s s n n
n n or nst p po n r str nt o tr or
o r nt t t o ort C ro n -

on 5 sp st t t s t v n t o s n pp s
to r nts n s tt nts nt r nt d r n | or t n on or t r t t t '2'

on 5 v s ntro on t Ho s oor ro n on n
| st pr or to t t r n n v ot to opt t Fr A t-B t t po nt t
Fr A t r n r on v p r n s-B s t n nt s
ntro on t Ho s oor n nt n nt n on r n o tt r port
ro n t t v n n | t r s n v r n oport nt ort p to o nt
r n ons r t on o t n nt-

on D t nt G n r Ass r r n t n nt st ss t n
t n n t s- pr s nt t v D on ntro t n nt on t Ho s oor
p n n t t

s n nt t r r v r o s or n t on s t t or so
t q r t st o p o w s n oo n

As on n | pr s nt t_v D on_v s q ot n n_v sp p r rt
st t n t t t -C-F r B r n ot r r or n t ons r q st t ts on
n ons-F r rs r n r n pr ss r to o t n on s n s n n on ontr ts-'

n n | t n nt p ss t H95 o | o § 9 9t | 9 opt 9 s | -ot

rs-

- Fr A t_v s r t t G n r Ass on n 9 | n
s n G_v r nor Coop r on | -
9- n t v rs pr n t Fr A t's p ss | ort C ro n 's
G_v r nors n G n r Ass v so r p t propos | n so t s
ppr_v | n ro s v s or po s t r t n non | t ns n t st t - n t s
s ss on r n_v t G n r Ass ons r n p ss t Fr A t t so
ons r no v r t n o r s t t_v o v s t r nts v n n
v or n nt st t to n r s r str t ons | p n t s | or s r t n -

Effects of the Farm Act on FLOC and its Members

- In the 1990s, FLOC's contract on the part of the growers or processors in the United States on the part of the Farm Act's restrictions-

- The Farm Act's restrictions on the part of the growers or processors in the United States on the part of the Farm Act's restrictions-

- Because of the restrictions on the part of the growers or processors in the United States on the part of the Farm Act's restrictions-

A_v r o H r n n |_v v to s t s s or p nt o s to F_{-j}[~] C-As
pr t tt d t s_v r q r rs to o s on t r p rson or n t r
p rson ts n o n or p o s n or_v s t t | pos n t to
s n nt n r o r o r ort t-

- F_{-j}[~] C rs r n to n t ro s o s n r s os n
t r t to sso t_v t F_{-j}[~] C n o n n o t_v t_v t to pr_v t r_v |
n n t_v | n o ot r r_v or rs- ort C ro n r_v or rs_v o r not
rr nt r pr s nt F_{-j}[~] C t_v s to on l r t n t r t s to n
ss to n on r pr s nt t on-

- B s o t F r A d F_{-j}[~] C s rr nt n to r_v ts n on
rs p nt r n nto n_v r nts_v t r t r pro rs or s
o s- r or to t A d t_v s F_{-j}[~] C's st n r pr t to n ot t s o
pr_v s on s p r t o n CBA or ot r n on r o n t on r nt n or r to t t
rs p or_v or rs_v o_v s to on F_{-j}[~] C- o | F_{-j}[~] C s n to n ot t n
s o r nts_v t n r t r pro rs_v n t o t s t st
on oppor t n t to n ot t CBA_v t n r t r pro r s n t A t too
t-F_{-j}[~] C s n n to n ot t s o rr n nt s t
r o n st t t s d F_{-j}[~] C s_v s ts rs_v o t or s o s
v o s t to n_v st t on n r n n v n or nt D n nt t n-

pro rs t Fr A t pr v s F₁ C n ts rs t t to s r n n t

ro s tt nt t r s t tt v r nt r st nt r sts-

9 - B n_v t n n r n r n n n or s tt nt r nts o

n n v_v n F₁ C n r t r pro rs t Fr A t str ps ro F₁ C t

r t n t to s tt t t on or pot nt t t on-

CLAIMS FOR RELIEF

COUNT ONE

9. F. C. n s n pr ss onl n n po t v o l to v n t

- B pr_v nt n F_↓ C n ts rsl n on F_↓ C n ts rsl
ro nt r n nto s o r nts t Fr A t n s n sp r_↓ s
s r n t on-

- Fr A t pos s sp r ns on prot t pr ss on n n on
sso t on s t n F_↓ C n ts rs to r n n v t or
nt r n nt d n r n n_v n n n or | s tt nt r nts n
r nts not to s t t r on t on pon n r t r pro r's st t s s
n on or non n on p o d'' or pon n r t r pro r's --- ntr nto or
r s to nt r nto n r nt_v t or n on or or or n t on-''

5 - Fr A t t_v pr_v nts F_↓ C ro pr ss n n v n n
t nt r sts o ts rsl n ort C ro n r_v or rs n r | n t
poss or F_↓ C to nt r nt d or n t ro | s tt nt r nts or r nts
not to s -B s t s r str t ons on t t on_r t pr ss on n sso t on
pp on to r_v or rs' n ons -+ F_↓ C t o nt to sp r_↓ s
s r n t on-

- B s t_v r n n r_v or rs' t to sso t n pr ss t r
nt r sts t ro or n on n p n n t r or n n t_v t s t Fr A t
n D n nts' n or nt o t A t r ns sp s on ts ont nt n
v_v po nt-

COUNT TWO
VIOLATION OF RIGHTS UNDER THE EQUAL PROTECTION CLAUSE OF
THE FOURTEENTH AMENDMENT TO THE UNITED STATES
CONSTITUTION

- Fr A t n D n nts' n or nt o t A t pr_v nt
E₁ C o t q prot t on o t Ψ s s on t r | n t on or n | n |
n-or r nt r_v or r st t s o t s rs n on t s s o t r | n t on
or n | n | n-or r nt r_v or r st t s o t Ψ or or t s t to
or n n n ss st n -

- Fr A t n D n nts' n or nt o t A t pr_v nt s
o o n s n A_v r o H r n n o t q prot t on o t Ψ s s on
t r r | n t on or n | n | n-or r nt r_v or r st t s-

-

pr | st n r ts to v o nt r s o s n to n ot t s tt nt t r s
t t st p t n r nt, t F-1 C-

COUNT THREE
VIOLATION OF RIGHTS UNDER 42 U.S.C. § 1981 TO CONTRACT, TO BE
PARTIES, AND TO LEGAL PROCEEDINGS
42 U.S.C. § 1983
On Behalf of All Plaintiffs Against All Defendants

- or o n t ons r r p t n n orpor t s t o s t
ort r n-

9- nt s ss rt p rs nt to --C- 9 or v o t ons o
--C- 9 - nt F-1 C ss rts t s on o ts n ts rs-

- F r A t n D n nts' n or nt o t A t str p t r ts to
n n or ontr ts to s | p rt s n to t n q n to v s
n pro n s or t s r t o p rsons n prop rt s s no v t t ns
ro v or or n n ont t r ot q r 9 - t nd q r 9 non t ns n
r o n n str -

- F r A t n D n nts' n or nt o t A t n v pr v
nt F-1 C o t r ts to n n or ontr ts to s | to p rt s n to
t n q n to v s n pro n s or t s r t o p rsons n
prop rt s s no v t t ns s ont r | t n t | n-or n o ts
rs n ont s s o t r | t n t n-or n o t v or or t s
t to or n n n ss st n -

- Fr A t n D n nts' n or nt o t A t n v s t
nt s o o n s n A v r o H rn n to r n n v p n t s or

Ent r p r n nt n n t on n on n t n or nt o t on 5 o t

F r A t

r r D n nts to t not t r o rsl ntsl p o sl n

ot r p rsons n tv on rt or p rt p t on v t t l n n t

n str tv n o s o st t o rtsl p r n nt

n n t on s nt r

A r nt s t r r son ttorn s' s n osts p rs nt to

--C- 9 n --C- 9 n sot r s p r tt v n

r rs ot rr st s Co rt s st n q t -

sp t s tt t s t o F r r l l

-s r st -Gr n
r st

C r stop r Broo
 ort C ro n B r o-
roo o n -er
 AC - o ort C ro n
 - Bo
 | C - |
 9 9 | |

C ro Broo
 ort C ro n B r o- 9
ro n st -er
 C r ont p
 ort C ro n B r o- -
r ont n st -er
 ort C ro n st C nt r
 ~ Bo
 | C -
 Broo 9 9 5
 p - 9 9 | 5 | 5
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Counsel for Plaintiffs

