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**SUPERIOR COURT OF WASHINGTON  
FOR SKAGIT COUNTY**

FAMILIAS UNIDAS POR LA  
JUSTICIA, AFL-CIO and UNITED  
FARM WORKERS OF AMERICA,

Petitioners,

vs.

WASHINGTON DEPARTMENT OF  
LABOR AND INDUSTRIES, and  
WASHINGTON DEPARTMENT OF  
HEALTH.

Respondents.

No.

DECLARATION OF RAMON TORRES

I, Ramon Torres, declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct and based on personal knowledge:

1. I am over the age of 18 and am competent to testify as to the contents of this declaration. I do so from my personal knowledge.

2. I am the President of Familias Unidas por la Justicia.

3. Familias Unidas is an independent farm-worker union formed to advocate for improved wages and working conditions for farm workers. Familias Unidas is an affiliate of the Washington State Labor Council, AFL-CIO. Familias Unidas is just commencing a fourth season

1 Familias Unidas is also actively organizing among other farmworkers both domestic and H-2A  
2 visa workers.

3 4. Familias has represented and continues to represent both domestic farmworkers  
4 living in Washington State as well as H-2A workers from Mexico who regularly obtain  
5 temporary work visas to work in Washington State.

6 5. Familias currently has members that are both domestic farm workers and H-2A  
7 farm workers who are currently employed on Washington farms and, some of whom, are  
8 currently residing in temporary labor camps licensed by the Washington State Department of  
9 Health.

10 6. Familias members are indigent farm workers, many of whom have families with  
11 small children, and their annual wages ordinarily put them at or below federal poverty  
12 guidelines.

13 7. Familias is being represented by Columbia Legal Services, a nonprofit law firm  
14 that represents indigent clients and does not charge for its services, and Barnard Iglitizin and  
15 Lavitt, a law firm providing its services on a pro bono basis.

16 8. In the summer of 2017, I went to Sumas, Washington to support a large group of  
17 H-2A workers from Mexico who had been fired for requesting safety and health protections at  
18 Sarbanand Farms. Many of those workers are Familias Unidas members.

19 9. Attached as Exhibit A are true and accurate copies of photographs of the living  
20 conditions at the dormitory-style housing in their labor camp.

21 10. In the fall of 2017, I went to Larson Orchard in Quincy, Washington to meet with  
22 striking and fired H-2A workers many of whom are Familias Unidas members and to negotiate a  
23 return to work agreement with the company.

DECLARATION OF RAMON TORRES - 2

Columbia Legal Services  
711 Capitol Way S #706  
Olympia, WA 98501  
(360) 943-6260  
(360) 754-4578 (fax)

1           11.     Attached as Exhibit B are true and accurate copies of photographs of the living  
2 conditions at the dorms in their labor camp.

3           12.     In 2019, I went to Mattawa, Washington to meet with striking H-2A workers from  
4 King Fuji orchards, many of whom are Familias Unidas members.

5           13.     Attached as Exhibit C are true and accurate copies of photographs of the living  
6 conditions at the dormitory-style housing and the transportation in their labor camp.

7           14.     Last month, I went to eastern Washington to meet with both domestic and H-2A  
8 farmworkers about their living and working conditions.

9           15.     The workers I met with were scared about their health and safety due to the  
10 COVID-19 pandemic and the lack of protections available to them in the fields, packing sheds,  
11 and housing facilities.

12          16.     The living conditions in housing for H-2A workers are typically involve many  
13 workers housed in one room cabins, often supplied with bunk beds for sleeping, and containing  
14 shared cooking and bathroom facilities. This situation continues to be the norm despite the  
15 existence of the novel corona virus pandemic.

16          17.     H-2A workers do not have their own transportation and so usually travel in buses  
17 or vans to and from the fields or to visit local stores for groceries and supplies. This situation  
18 continues to be the norm despite the existence of the novel corona virus pandemic.

19          18.     Farmworkers, whether domestic or H-2A work in rural fields and typically are not  
20 provided with cleaning supplies in the fields. This situation continues to be the norm despite the  
21 existence of the novel corona virus pandemic.

1           19.     I am a voting member of the Agricultural and Seasonal Workforce Services  
2 Advisory Committee established by the Washington State Employment Security Division (ESD).  
3 The Committee’s work is located at <https://esd.wa.gov/newsroom/Ag-committee>.

4           20.     The following information regarding the use of H-2A workers in Washington  
5 State is located on ESD’s web-site announcing the formation of the Committee: “ESD's  
6 workload for the H-2A program has grown 1,000 percent since 2009,” LeVine said. “We predict  
7 growers will request more than 30,000 H-2A workers during 2019. Due to this rapid growth and  
8 high demand, we need an evaluation of the resources necessary to support this program. We are  
9 pleased the Legislature recognized the need for action and look forward to working with the  
10 committee members going forward.” ([https://esd.wa.gov/newsroom/governor-signs-bill-to-  
11 strengthen-washington-agriculture-economy](https://esd.wa.gov/newsroom/governor-signs-bill-to-strengthen-washington-agriculture-economy))

12  
13 Dated this 14th day of April, 2020.

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Ramon Torres

# EXHIBIT A



# EXHIBIT B



# EXHIBIT C



News report with additional footage of same camp: <http://kunwtv.com/news/local/empleados-de-la-compaa-king-fuji-ranch-realizan-una-huelga-por-injusticias-laborales>

