

DECLARATION OF LUIS GONZALES VILLEGAS

I, Luis Gonzales Villegas declare as follows:

1. I am the oldest living child of Jose Villegas and Concepcion Gonzales. I am Sammy Lopez' uncle. His mother Concepcion Villegas Lopez is my younger sister, and my family has always called her Corrina.

2. My father's parents were Jesus and Maria Villegas. My grandfather Jesus was Spanish but he was raised by an Indian tribe in Cananea in the State of Senola, Mexico. My grandmother Maria was a Mexican Indian who was born blind. They married and lived most of their lives in the mountains of Chihuahua, Mexico. They had several children together including my father Jose, my aunt Maria and another son named Pablo. My father Jose also had a half-brother named Jose Blanco. My aunt Maria lived in San Juanita, Mexico, as an adult. She visited our family in Fabens in 1945 when my wife Delores and I were newlyweds. Sammy's mother Corrina was not yet born.

3. My father Jose Villegas never had the opportunity to go to school. He never learned to read or write, and he never learned to speak more than a few words of English. He signed his mark with a triple X. Father came by himself to the United States when he was about 20 years old to look for work. My father worked on farms and in the fields when he first came to the United States. He was working in the cotton fields in Fabens, Texas, when he met and married my mother. Their first child, my older brother Antonio, was born in Fabens in 1923, and I followed in 1924. Antonio died the next year before he was two years old.

4. As my father searched for work to support us, we left Fabens and travelled to New Mexico and Arizona and even on into California. He usually worked on farms, although he killed ducks for a company in the Calipatria Imperial Valley for a while. My sister Angela was born in Southern California in 1928 and my brother Alfredo was born in Las Cruces, New Mexico in 1929. The Depression made it even harder for my father to find work and he moved us back to El Paso County (Fabens), Texas where the rest of my brothers and sisters were born.

5. Eventually, my father got work with the Southern Pacific Railroad where he worked until he retired 36 years later. At first we lived in the railroad housing, but in his extra time, my father built our family house in Fabens. He usually had Sunday off so he spent the whole day working on the house. When we first moved into the house it had two bedrooms, a living room and a kitchen. My parents put beds in the living room and on the back porch, but we still had to sleep two to three people in each bed. We also had an old covered wagon in the yard. When my sister Angela got married, she and her husband slept on a mattress in the wagon. My father later built on two more rooms. We did not have an indoor bathroom until after I joined the Army.

6. My parents also helped my grandmother Martina buy a house less than a block from our house. It was also a small grey square building with just a kitchen and one other room. She kept goats in her yard.

7. When we were little, the streets in Fabens did not have names and the houses did not have addresses. The mail is still not delivered to people's homes in Fabens; everyone has a post office box instead. The neighborhoods had names, though, like Turtle and Windmill. The street where my family lived was eventually called Johnson Street after the man who originally owned the land around it.

8. My father liked to drink, but he did not ever get mean or violent when he drank. He was always a warm and affectionate man.

9. My mother Concepcion, on the other hand, was a very cold woman. She had a very difficult childhood. My mother's father Luis Gonzales, was a store owner in Torreón in central Mexico in the state of Coahuila. He had two stores and was a fairly wealthy man until he was shot and killed by Pancho Villa's bandits. His wife Martina Gonzales never went to school, but she was a smart and strong woman. After her husband was murdered, she walked into the United States with her small daughters, Concepcion and Cruz. She did not realize she had left Mexico; she was just walking to safety. Martina found her way to Fabens, where she supported herself and her two children by washing clothes and cooking and cleaning for the farm and railroad workers. Later, Martina worked in a restaurant. She was still working in a restaurant when her daughter Concepcion married José Villegas.

10. My mother was just 11 years old when she walked into Texas with her mother and her three-year-old sister Cruz. Like her mother before her, Concepcion never attended school in either Mexico or the United States. She never learned to speak English and she never learned to read or write in any language, but she did learn to sign her name.

11. My mother met and married my father in Fabens when she was 16 years old. My father was 21. They never applied to be legal residents or citizens of the United States. They were afraid that they would be deported if they tried. They also felt that in some ways they would be betraying their Mexican heritage if they got American citizenship.

12. My mother was very strict. It was very important to her that her children be hardworking and well groomed. She did not tolerate weakness. She expected us to take care of our

chores and responsibilities and to make sure that our younger brothers and sisters did the same. She often punished many or all of us for something one of us had done. She made us children clean the house, wash clothes and cook. As the oldest daughter, my sister Angela was responsible for braiding the hair of each of the younger girls every morning. My mother made her braid their hair very tightly so it would stay neat. My sisters did not like it that tight because it hurt their heads, and they often loosened the braids once they were at school. But if they forgot to rebraid their hair before they got home, mother hit them for loosening the braids.

13. The Catholic Church was very important to my mother. She expected everyone in her house to attend church every week, at least on Sunday. Anyone who missed church on Sunday for any reason could not leave the house until the next Sunday except to go to school or work. Our Sister of Guadalupe Catholic Church has always been the biggest building in Fabens.

14. I started school in Fabens. When I was in the second grade, my family moved to housing provided by the Southern Pacific Railroad for its workers further out in El Paso County. The closest school to the railroad housing was in Fort Hancock. I walked a mile and a half to a bus stop to take a bus to Fort Hancock. When my brothers and sisters were old enough, they did, too. I withdrew from school about the fourth grade. I never learned to read or write in English or Spanish.

15. I started working full-time in the fields after I left school. One of my first jobs was planting sweet potatoes for 10 cents per plant. It was hard work because the plants had to be placed deep into the mud, which was wet and hard to walk through. The mud soaked through my clothes to my skin. When I was little, people in Fabens, including me and all my brothers and sisters, worked mostly in the cotton fields. But many years ago the owners started using machines and less

workers. Today there are only a few cotton fields left at all. There are more pecan and pepper fields than cotton fields now.

16. I first saw my future wife Delores, who is called Lola, when she was getting on a school bus. I was 15 and Delores was 14. I started trying to be near her bus stop when she went to school just so that I could see her because I knew that I wanted to marry her. I did not know how to read or write, so I got my Aunt Cruz and my brother Alfredo to write letters to Delores for me. I wrote to her for five years. At first, she sent my letters back to me. After I continued writing to her for a while, she finally wrote back to say she did not know who I was and she wanted me to stop writing. But I kept writing to her, even after I joined the Army and moved away, and eventually she started writing back to me. When I returned home on leave, I told my father that I wanted to marry her. He agreed to go with me to ask Delores' father for permission. We went to their house a couple of times, but her father was never home. Finally, we went to speak to him in the field where he tended cattle. He got angry and told us his daughter was not a cow to be discussed in a pasture. He said we had to wait for him at his house if we wanted him to listen to us. While we waited for Delores' father to finish his work, we went into town to eat and drink a few beers. I think my father was more nervous than I was -- he was so anxious he put black pepper in his beer and drank it. Delores' father gave his permission for me to marry Delores, and we have been happily married for 54 years.

17. On our wedding night, I stayed out drinking with my friends. I got so drunk that when I woke up the next day, I had forgotten that Delores and I were married. When I finally went home, I asked my mother what Delores was doing there. Two days later, I was shipped out by the Army and was not able to return home for another year and a half. I had joined the Army when I

was a teenager because there was so little work in Fabens, and I was in still in the Army when I married Delores. Just after we were married, I was stationed in Japan. I am not sure why, but I was released from the Army shortly thereafter, although I was recalled into active duty when the United States entered World War II.

18. Delores lived with my family during the times I was away on military duty, and I sent my mother my paycheck each month. In addition to Delores, my sisters Angela, Fina, Maria and Corrina and my brothers Alfredo, Ricardo, Jesus and baby Jose and my cousins Stephen and Jose Vera all lived with my parents at that time, plus my mother was pregnant with Venancia. The house had only three rooms then and no indoor bathroom. My father treated Delores like one of his own daughters. He gave her 50 cents each payday for candy and bought her clothes when he bought my sisters clothes. My sisters Fina and Maria shared their bed with her. Still, it was hard for Delores to live with my family, at least at first. She was not used to having so many people around her all of the time. She was not used to how spicy my mother taught my sisters to make our beans. She thought it was strange that my family put molé instead of stuffing in the turkey at Thanksgiving.

19. After I finished my military service, I returned to Fabens. I was drinking in a bar when my mother walked past and saw me.

20. I tried to find work to support my wife and family in the Fabens area, but there were few jobs. I worked as a truck driver and then I worked for the railroad. After my grandmother Martina died and Aunt Cruz moved Phoenix, Delores and I moved our family from my parents' home into Martina's house. Martina's home was only a room and a kitchen, but it meant a lot more space and privacy for my family. We later moved to Abilene for a while to follow work with the

railroad. Eventually that job was finished, too, and I again had to look for work. This time we decided to try Fort Worth, which is much bigger than Fabens and has many more job opportunities. Delores also had two sisters and a brother in Fort Worth. We moved to Fort Worth in 1955 and have lived in the area ever since then.

21. In 1960, we bought the house we live in today. We agreed to pay \$7,800, but the house needed some work and to be painted so we did not have to make a down payment. Still, it was hard to make the payments because I earned only \$1.15 per hour when we bought the house. For a long time, we slept and ate on pieces of cardboard because we could not afford any furniture. We only had enough money to make our house payment, buy groceries and a few beers.

22. Money was always very tight back then, but my wife and I struggled hard to provide for our four daughters. We tried to have meat, usually chicken, once a week. We managed to buy each of our children four new clothing outfits at the beginning of each school year. Of course, children did not dress like they do now; children today want certain brands of clothes and expensive running shoes.

23. I worked for 30 years at the Trinity Valley Iron and Steel foundry in Fort Worth. I retired in 1990 when the foundry went bankrupt. After all those years I still was earning only \$5 per hour when I retired.

24. My parents had so many children over such a long period of time that we are very different in age. I am closest to my oldest surviving brother and sister, Alfredo and Angela, who are just four and five years younger than me.

25. When I was a boy, two of mother's cousins were orphaned in Mexico. Jose and Stephen Vera were about 5 and 6 years old, just a little younger than me, when their parents died.

They came to Fabens to live with my grandmother Martina. When Martina became too old to raise them anymore, they moved in with my parents and family.

26. For as long as I knew Jose, he was always depressed. When he was little, I thought it was because his parents had died, but he never got over it. He was never a happy boy or adult. He joined the U.S. Army, but he was released. He began to do strange things like hide all his money in a suitcase. A couple of years after I moved to Fort Worth with my wife and daughters, Jose was in a car accident. Instead of arresting Jose, the police put him in a mental institution in Waco, Texas. When Jose got out of the mental hospital he went to California to find his brother Stephen.

27. Stephen also joined the military. He stayed in the Air Force until he retired. He was stationed in Sacramento when Jose got out of the hospital and went to find him. Jose did not get better though, and he was placed in a mental hospital in Sacramento where he still lives today. Stephen has since died, but his widow Ofelia still lives in Sacramento, too.

28. When Corrina was still in high school, she was raped and became pregnant. Our mother was very angry at Corrina for being pregnant. She was ashamed of Corrina and made her stay in the back room whenever anyone came to the house. My mother, my sister Angela, my sister Corrina and my wife Delores were all pregnant at the same time. My youngest sister Petra, Angela's son Rubin, Corrina's son Roberto and my third daughter Juanita were all born within a year of each other.

29. Our mother ordered Corrina to get a job to support baby Roberto, but Fabens was very small and there was little work in the fields and not many other jobs at all. In 1951, Corrina went to look for work in Phoenix, where our aunt Cruz Gonzales Madrid and our sister Fina lived. Roberto was less than six months old, and my parents made Corrina leave Roberto behind with

them. Once she left Fabens, Corrina separated completely from us. We did not hear from her very often and we did not see her at all for many years. The last time I saw Corrina was about two years ago at our father's funeral.

30. Corrina has remained in Phoenix to this day. She got a job working in the fields around Phoenix, where she met Arcadio Lopez. Arcadio never married Corrina because he had a wife in Mexico, but Corrina and Arcadio stayed together for many years and had eight sons and a daughter together. Arcadio eventually left Corrina just like he left his wife in Mexico.

31. When Corrina's son Roberto was little, he believed that my parents were his parents, too, instead of his grandparents. He called my parents Mom and Dad, just like my sisters and brothers and I did. I don't think Roberto found out Corrina was his mother instead of his sister until she came to visit when he was about 10 years old. My family and I had already moved to Fort Worth by then. When Roberto learned that Corrina was his real mother, he became very upset and confused.

32. For a long time, Roberto remained very troubled. He drank too much, and he becomes hostile when he drinks. He has gotten in many fights while he was drunk. He eventually went to prison for a few years. After Roberto got out of prison last year, he went to live with my sister Petra and her family just up the street from me. He has worked hard to be a better person and to learn from his mistakes. He has even tried to quit drinking.

33. My brother Alfredo is four years younger than I am. He joined the U.S. Army when he was a teenager. He became a paratrooper and a cook. After he got out of the service, he became a chef. He got married and moved to Santa Barbara, California, where he has lived for many years.

34. My brother Ricardo was born in 1939. Like Alfredo, Ricardo also became a chef.

He moved to California with Alfredo for a while when he was still a teenager. Alfredo was 10 years older than Ricardo. Ricardo was a kind man, but he changed when he drank. Drinking made Ricardo want to fight. Ricardo never got to find his dream of being a chef though. He was murdered when he was still only in his early twenties. Ricardo was an alcoholic and had cirrhosis of the liver. He died in a bar in California when a woman shot and killed him and then herself. A gun belonging to another woman was found on his body. Ricardo had been dead more than a month before the police contacted our family.

35. I did not know my brother Jesus very well. He was born in 1941, so he was 17 years younger than me. He died in a drunken-driving accident in 1962, when he was 20. My youngest brother Jose, two years younger than Jesus, has also had alcohol-related problems and has been arrested at least twice for drinking and driving. I left the Fabens area when Jose was just a small child, so I don't know him very well, either.

36. My youngest sister Petra and her family, including Corinna's son Roberto, live on the same street as my family here in Fort Worth, and my sister Venancia and her family live just a few streets away, but Venancia and Petra are both more than 20 years younger than me. They are much closer to each other than to me. Their kids, and sometimes Venie and Petra themselves, call me Grandpa.

37. Our mother lives with Venie and I visit her several times each week. But our mother has Alzheimer's dementia and does not recognize most people, not even her children. My face is familiar to her, but she usually thinks I am her father instead of her son. She thinks Venie is just some nice lady who takes care of her.

38. If Sammy's trial lawyers had contacted me, I would have told them about my sister

Corrina and our family.

I declare under penalty of perjury under the laws of the state of Arizona and the United States that the forgoing is true and correct.

Signed Executed on 4-8, 1999.

A handwritten signature in black ink, appearing to read "Luis Villegas", written over a horizontal line.

Luis Villegas