Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

MCALLEN GRACE BRETHREN CHURCH, *et al.*,	
Plaintiffs,	
v.	Case No. 7:07-cv-60
SALLY JEWELL, SECRETARY, UNITED STATES DEPARTMENT OF THE INTERIOR	**DECLARATION OF HOMER HINOJOSA**
Defendant.	

Declaration of Homer Hinojosa

1. My name is Homer Hinojosa. I am over the age of 18 and have personal knowledge of the contents of this declaration.

A. Background

2. I live in Edinburg, Texas.

3. I am a member of the Lipan Apache Tribe of Texas. The Lipan Apache people have lived in Texas and Northern Mexico for over 300 years and have enjoyed government-to-government relations with Spain, Mexico, the Republic of Texas, the State of Texas, and the United States.

4. I am a practicing member of McAllen Grace Brethren Church. The McAllen Grace Brethren Church is a 501(c)(3) religious organization incorporated under the laws of Texas and headquartered in McAllen, Texas. I am a practicing

member of the Native American New Life Center. It is one of the contextual ministries of the McAllen Grace Brethren Church and was founded in McAllen in 1995.

5. I am a practicing member of the San Antonio Indian Fellowship—now called the Chief of Chiefs Christian Church. Chief of Chiefs is a religious ministry of McAllen Grace Brethren Church that was founded in San Antonio, Texas, in 2006.

6. I am a practicing member of the South Texas Indian Dancers Association. The South Texas Indian Dancers Association is an intertribal organization dedicated to cultural preservation, including the preservation of traditional songs, dance, and spirituality.

B. Religious Beliefs and Practices

7. Like many American Indians, I hold eagles, including bald and golden eagles, to be deeply sacred. I believe that eagles have a special closeness to the Creator, special spiritual attributes, and are used as spiritual instruments to carry prayers to God. I believe that all feathers and bird parts are sacred gifts from the Creator, and that wearing, holding, and attaching bird parts to sacred objects is essential to our traditions and our connection with the Creator. Thus, eagle feathers and other eagle parts play a central role in many of my religious and traditional practices.

8. For example, eagle feathers are essential to the process of smudging, which is a cleansing ritual that takes place in a variety of religious ceremonies. They are essential to my traditional religious dances and prayers. They are also

given as religious gifts on deeply meaningful occasions. As part of my religious practices, I have personally used eagle feathers in smudging, dancing, and prayer, and I have given and received eagle feathers as religious gifts.

9. I would never shoot or kill any eagle to obtain feathers or bird parts. That would be a sacrilege. Instead, I want to use eagle parts that I receive as gifts, find naturally in the wild, exchange with other tribal members through trade, or borrow from other tribal members on loan. I would also be glad to receive eagle feathers from zoos, aviaries, or the National Eagle Repository.

10. I have personally received eagle feathers in several of these ways. For example, when I was overseas in 2009 doing ministry work in La Garenne, Switzerland my ministry group and I were invited to visit with a local zookeeper to share our religious beliefs with him. In return for our time, the zookeeper gifted each of us an eagle feather. The zookeeper owned several eagles and had collected many feathers that had molted over time. In addition to the eagle feather the zookeeper gave me, another person from my team gifted me the one he had received from the zookeeper.

11. I also received a feather from a friend when my father passed away from bone cancer in July 2014. On July 18-20th, there was a powwow in Sedalia, Missouri. I could not attend the powwow because I had to stay back and handle a few things with the funeral home. However, my mother attended, and a friend gave a feather to my mom to pass on to me. He gifted the feather as a representation of my father and as a way of honoring him.

12. Another friend once gave me a feather so that I had enough for my roach, which I wear when I am performing my sacred dances. I had one feather, but needed two, and was gifted one to complete the set.

C. The 2006 Powwow

13. I was present at the powwow in McAllen, Texas on March 11, 2006 that was raided by a federal agent and where several people's feathers were confiscated.

14. During the powwow, I noticed a man observing the dances and the vendor booths very intently, as if he was examining each detail.

15. Later, during one of the breaks in the dancing, I stepped outside into the hallway to cool off. When I stepped out, I saw Pastor Robert Soto engaged in a heated conversation with the same man that I had earlier seen examining the powwow. I overheard parts of the arguments but did not fully understand what they were discussing.

16. After the man left, Pastor Soto came back inside and told everyone that a federal agent had come to our powwow to confiscate our feathers. It was then that I realized that the man I had observed was a federal agent.

D. The Effects of the Government's Conduct

17. The government's raid and threat of criminal prosecution have left an emotional scar on my entire community. Many of my community members have been forced to hide their feathers. They do not want to bring them out for fear of having them confiscated. So when we have powwows, we use either fake feathers or

turkey feathers—and we hate doing this because eagle feathers are the ones that are sacred. We hate that we have to hide our feathers because we want to be able to wear them proudly and openly.

18. After the raid, I was upset, angry, confused. Over time, my anger has transformed into defiance and I still wear feathers when I am dancing. Our people do not have a whole lot and what little we do have is being taken away. I cannot let this happen. I wear my eagle feathers when I am dancing because I do not want to be afraid. I hope that one day I will have the same right to use eagle feathers to honor my Creator as my federally recognized brothers and sisters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 8, 2015 in Edinburg, Texas.

Homer Hinojosa