

The Farm Bureau's Billions: The Voice of Farmers or Agribusiness?

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Calling itself the “voice of agriculture”¹ and promoting itself as a tireless defender of farmers, the American Farm Bureau Federation has successfully positioned itself as one of the most powerful interest groups in the United States.² A cursory look beyond its pro-farmer public relations campaign, however, reveals billions of dollars in assets, close alliances with the insurance industry, and legions of lobbyists³ — making it difficult to view the Farm Bureau in a different light from the powerful agribusiness corporations with which it regularly partners.

Far away from America’s farms, fields and ranches, the Farm Bureau flexes its financial and political might in statehouses, courthouses and the halls of Congress, shaping everything from civil rights legislation to health insurance to agricultural policy.⁴ Sometimes advocating positions that actually hurt farmers or on issues which don’t concern them at all, the Farm Bureau appears to use farmers in one of two ways: as a source of revenue or a front to advance the organization’s political agenda and financial portfolio.



What is indisputable is the Farm Bureau’s sprawling, billion-dollar collection of interlocking non-profit organizations and high-stakes insurance companies. In the nine decades it has been in operation, the number of farms in the United States has dropped from a peak of 7 million to 2 million while the Farm Bureau has amassed a fortune that would stir the envy of many corporations, its deep coffers cementing its political influence.⁵

How the Farm Bureau is able to maintain its non-profit status with such vast financial reserves and close ties to the insurance industry is a question that deserves fresh review.

The Farm Bureau’s Financial Empire

The Farm Bureau’s immense finances drive its political power. With its nearly 3,000 affiliated state and county-level non-profit farm bureaus, the combined organization maintains billions of dollars in assets, making it among the most monied non-profit organizations in the United States.⁶ Meanwhile, the Farm Bureau’s affiliated for-profit companies, many of them in insurance, maintain assets on a whole other order. While the Farm Bureau tries to maintain an image of fighting for the little guy, its affiliates invest tens of millions of dollars into corporate agribusiness — Cargill, ConAgra, Dow Chemical, DuPont, Tyson and Archer Daniel Midlands.⁷

While the vast majority of the Farm Bureau network’s revenues seem to come from non-agricultural enterprises, as described below, most of the organization’s contact with farmers occurs through a vendor-client relationship. In some parts of the country, Farm Bureau affiliates even act as vertically integrated one-stop shops for farmers, selling everything from tires to genetically modified seed to crop insurance.

Crop Insurance

Part of a \$7 billion government-backed program, crop insurance is a small but not insignificant part of the Farm Bureau's financial network, which reported underwriting at least \$300 million in crop insurance premiums in 2008.⁸

Insurers garnered \$1.6 billion in administrative fees in 2009 from the federal government, a giveaway from the United States Department of Agriculture (USDA), which also paid out \$5 billion to subsidize the premiums that farmers pay insurers.⁹ While it is unclear how much of this government money the Farm Bureau or its affiliates earned, a single one of its affiliates reported receiving \$34 million in 2008.¹⁰

While crop insurance does serve a potentially beneficial role to farmers, it is not clear if the Farm Bureau has farmers' interests in mind. Western Agricultural Insurance Company, a Farm Bureau Affiliate, teamed up with corporate biotech giant Monsanto to submit a proposal to the USDA that created a discount crop insurance plan for growers of Monsanto's triple-stack genetically modified (GM) crops, claiming that these crops were less risky than other (non-GM) crops.¹¹ Now in place, the program gives farmers an estimated 13% reduction in insurance costs — in effect subsidizing Monsanto's costly trait-endowed seed, which is significantly more expensive than non-GM seed.¹² In as much as the Farm Bureau will say this program helps farmers, it probably helped its own business interests — and those of its corporate ally Monsanto — far more.

At a 2009 House Agriculture hearing on crop insurance, both the president of the American Farm Bureau Federation and a member from the Louisiana Farm Bureau testified, advocating for increased support of the government subsidized program.¹³ Interestingly, the president of the American Farm Bureau Federation, Bob Stallman, is also the president and Chairman of the Board of the American Agricultural Insurance Group, a Farm Bureau affiliate which has a \$134 million dollar stake in crop insurance.¹⁴ Stallman's two positions — advocating on behalf of farmers for expanded crop insurance while serving as the president of a for-profit company that would benefit financially from such an expansion — give every appearance of a conflict of interest.

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Non-Agricultural Insurance

Farm Bureau affiliates' interest in crop insurance, however, is a very small drop in their multi-billion dollar bucket of affiliated insurance and financial companies. The Iowa Farm Bureau and other Farm Bureau organizations own a 69.1 percent voting interest in FBL Financial group, a private business entity whose banking and insurance reach includes more than \$14 billion in assets, generating close to \$650 million in income in 2007.¹⁵ FBL Financial, in turn, leverages its relationship with the Farm Bureau to tap its member roster for clients.¹⁶

The Illinois Farm Bureau, called the Illinois Agricultural Association (IAA),¹⁷ is another financial powerhouse. Like other state and county-level Farm Bureaus, the IAA is a non-profit organization, but it maintains around a billion dollars in assets.¹⁸ The IAA's affiliated companies include the Country brand of insurance, which has more than \$10 billion in assets.¹⁹

The non-profit Missouri Farm Bureau reports more than \$600 million in assets through its subsidiary insurance companies²⁰ while the Kansas Farm Bureau has close to \$100 million in assets with tens of millions of dollars invested in its affiliated companies.²¹ The Alabama Farm Bureau and the insurance giant ALFA maintain a very close relationship, with millions of dollars passing between the entities every year.²² ALFA insurance is headquartered in the Alabama Farm Bureau's offices, and the two entities keep the same president, who earned more than \$7 million in 2008.²³

Nationwide, an insurance and financial giant based in Columbus, Ohio, was started by the Ohio Farm Bureau decades ago, and the two entities maintain a close relationship. The company reported revenues of more than \$4.5 billion and assets exceeding \$119 billion in 2007, the

last year in which it filed U.S. Security and Exchange Commission documents as a public company.²⁴ Nine of its 15 directors are associated with the Farm Bureau, six having served in executive positions for the Ohio Farm Bureau or the American Farm Bureau Federation.²⁵ Nationwide is still overcoming the public relations nightmare that followed a \$13 million settlement with the Department of Justice, which charged the company with discriminating against minorities in its insurance operations.²⁶

Farmer Cooperatives

Amazingly, the behemoth Farm Bureau maintains these vast riches and wide investments in the insurance industry while also claiming non-profit status — a subject that has been scrutinized by Congress and the Internal Revenue Service.²⁷

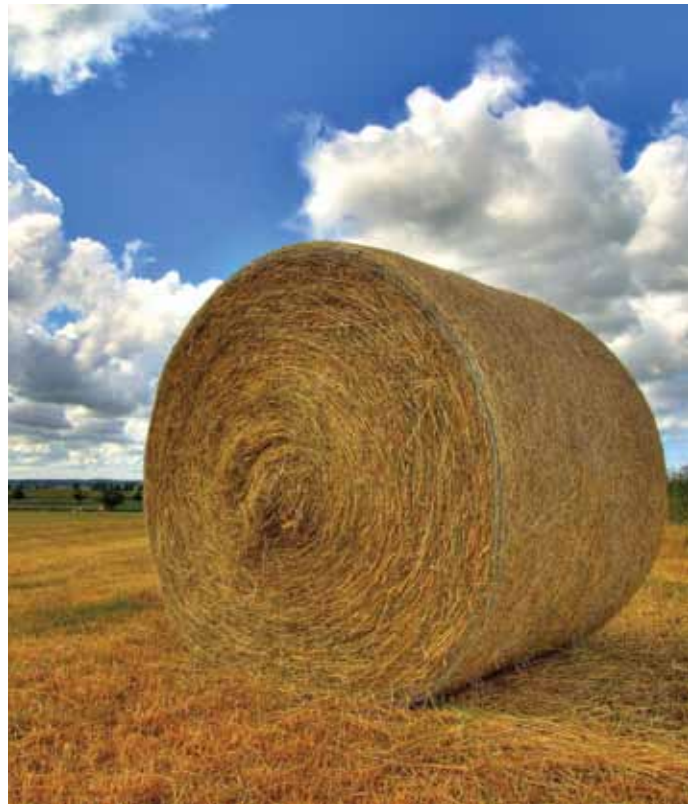
The Farm Bureau also takes advantage of tax law with its participation in farmer cooperatives. Growmark, a \$6 billion cooperative with far-ranging business interests in the Midwest, was started by Farm Bureau members, and many Growmark board members are Farm Bureau members or involved with Farm Bureau affiliates.²⁸ Only Farm Bureau members are eligible to receive patronage funds — profits that are redistributed back to farmer-members of the cooperative.²⁹

Growmark is headquartered at the Illinois Farm Bureau,³⁰ and the two organizations have joint-venture providing crop insurance to farmers.³¹ Growmark is involved in oil refining and distribution, gas stations and grain elevators, and it has expansive ties to corporate agribusiness, including selling seeds endowed with Monsanto's patented Round-Up Ready traits under its own brand, FS seeds.³² It has formed alliances with Novartis Seeds, Land O'Lakes and Syngenta, and in 1985, the cooperative consolidated its grain terminals and merchandising operations with Archer Daniel Midlands (ADM).³³ For more than a decade, the president of Growmark was a member of the Board of Directors of ADM.³⁴

Buying Influence

With coffers that would stir the envy of many corporations, the Farm Bureau has financial clout that commands attention on Capitol Hill and in statehouses around the country.

The American Farm Bureau Federation, the parent organization of nearly 3,000 state and county-level bureaus, has been the largest or second-largest lobbyist from the agricultural sector the last five years, putting as much as \$8 million a year toward influencing legislation — in some years single-handedly representing close to a third of all money spent on lobbying from agriculture.³⁵ In the last five years, the Farm Bureau (neck and neck with Monsanto) has consistently ranked as the highest or second-highest spending lobbyist from the agriculture industry, shelling out tens of millions of dollars and employing hundreds of lobbyists to influence legislation.³⁶



In addition to the millions it spends lobbying on specific policies, the Farm Bureau chips in millions of dollars in federal and state campaign contributions, giving \$3.6 million in the 2007-2008 campaign cycle, the vast majority of it on the state level and to the Republican party.³⁷ Between 2005 and June 2010, the Farm Bureau contributed between two and three times as much money to Republicans as they did to Democrats;³⁸ it is not surprising that the Farm Bureau's political agenda frequently aligns with conservatives.

The Farm Bureau also raises huge sums of money to influence ballot issues, as it did in Ohio in 2009. In a matter of two months, the Farm Bureau was able to raise more than \$1.3 million from its national, state and county-level farm bureau affiliates to help pass a ballot issue in Ohio that transferred oversight of animal agriculture, including large-scale factory farms, from government agencies to a politically appointed board, on which Farm Bureau affiliates would eventually sit.³⁹ This radical change to Ohio's constitution was also supported by Monsanto, Syngenta and a host of industry groups representing corporate agriculture, which raised a combined \$5 million, flooding the airwaves and TV channels with advertising to influence voters.⁴⁰ Two positions on the politically appointed board were designated for members of "statewide farming organizations," and following the victory, the governor appointed at least two board members with ties to the Farm Bureau.⁴¹

Representing Farmers?

The Farm Bureau regularly claims to speak on behalf of farmers — especially to the media and to Congress — and frequently cites its 6.2 million "member families" or its role as the "nation's largest and most influential gen-

eral farm organization."⁴² An examination of the group's member support, however, suggests that the vast majority of its members are neither farmers nor necessarily advocates of the political platform that the Farm Bureau endorses on their behalf. Most members are likely insurance policy holders through a Farm Bureau affiliate, unaware that they are being counted among the supporters of the organization's political agenda.

For example, the Cook County Farm Bureau, which includes Chicago and its sprawling suburbs, has an incredible 40,000 members,⁴³ though there are only 184 farms in the entire county.⁴⁴ Similarly, Tennessee had fewer than 80,000 farms in 2007,⁴⁵ but it led Farm Bureau state rosters with more than 600,000 members.⁴⁶ In all of the United States, there are only around two million farms,⁴⁷ casting more doubt on the Farm Bureau's six-million member claim.

In all likelihood, the Farm Bureau's base of support is not rooted in the farms, fields and ranches of rural America, but in its insurance affiliates, which require or incentivize its policy holders to become members.⁴⁸ Journalists have investigated this point, finding Farm Bureau members who had joined the organization unwittingly through their car insurance policies — and who were unfamiliar with or outright opposed to the Farm Bureau's political agenda.⁴⁹

This political agenda frequently has little to do with agriculture. The American Farm Bureau was also a vocal opponent to health care legislation in 2010, taking a particularly strong stance against the public option.⁵⁰

Ten years earlier, the television journalism program *60 Minutes* reported its scathing investigation of the Farm Bu-



reau's ties to the insurance industry, mentioning the group's opposition to the Voting Rights Act of 1965, a landmark piece of legislation that helped curb discrimination against minority voters.⁵¹

In 1997, North Carolina's first black lawmaker proposed a civil rights bill aimed at correcting longstanding discrimination against minority farmers by the USDA,⁵² which the Farm Bureau successfully opposed.⁵³ The USDA has since agreed to pay more than \$1 billion settling discrimination charges from African-American farmers.⁵⁴

Bob Stallman, the president of the Farm Bureau, also has invoked post-slavery reparations in a seemingly mixed metaphor he used to condemn consumers and farmers who oppose the industrial model of agriculture, referring to them as "extremists who want to drag agriculture back to the day of 40 acres and a mule."⁵⁵

Is a group with these kinds of views on non-agricultural issues really a credible "voice of agriculture?"

Corporate-Fueled Agricultural Policy

When the Farm Bureau does weigh in on agriculture policy, its views frequently fail to support the interests of American farmers.

The group's routine partnerships with the dozen or so mega-corporations that control large sections of agriculture and food production — corporations whose activities go against the interests of independent family farmers — speak volumes to where the organization's loyalties lie.

A dozen or so corporate agribusinesses determine the economic fate of most farmers in the United States. In 2007, two seed companies controlled nearly 58 percent of the seed market in the United States, with Monsanto's patented seed traits found in almost 90 percent of genetically modified corn;⁵⁶ ranchers, meanwhile, face a similar dearth of competition. In 2007, five companies controlled nearly 84 percent of the beef and 66 percent of pork markets,⁵⁷ greatly restricting growers' options for selling livestock — and the prices they receive. These highly concentrated markets have hurt farmers, who, for example, have watched the price of seed corn more than double in the last decade⁵⁸ without seeing a comparable increase in the price of the corn they produce.

The Farm Bureau, instead of challenging this concentration and drawing attention to the impacts of concentration on their farmer members, consistently aligns with this structure of power. In concert with these partnerships, the Farm Bureau apes the corporate free-market mantra, supporting trade agreements that displace American-produced farm goods with cheap imports from countries with notoriously weak food safety regulations. Challenging the livelihoods of farmers and the country's food security, these trade agreements also hurt consumers, who increasingly have no option but to buy imported, unregulated food.



Farm Bill: Freedom to Fail

The cornerstone of the Farm Bureau's agricultural policy is the so-called Freedom to Farm Act, a sweeping change in federal agricultural policy in 1996 that incentivized increasing volumes of farm production, which quickly led to a surplus of commodity crops, devastating prices. Even in the face of these disastrous results, which were almost immediate, the Farm Bureau continued to support the policy.⁵⁹ In one glowing review of the program, the Farm Bureau lauded the independence associated with the new policy. Noting that risk that comes with this "independence," the Farm Bureau went on to emphasize the importance of crop insurance — which its affiliates sell.⁶⁰

Biotechnology

In 2010, 200,000 farmers and consumers sent letters to the USDA railing against Monsanto's proposed marketing of genetically modified (GM) alfalfa, which could contaminate non-GM alfalfa and threaten the livelihoods of many in the organic dairy and cattle industry, which cannot use GM crops as animal feed.⁶¹ The American Farm Bureau Federation, an advocate of biotechnology, filed an amicus brief on behalf of Monsanto's position to the Supreme Court, advocating the deregulation and approval of the GM alfalfa.⁶² In 2009, the Farm Bureau threw its support behind BASF and Syngenta, two other biotech behemoths, by filing a petition urging the Supreme Court to hear their arguments for limiting the scope of the Clean Water Act.⁶³ The Farm Bureau also advocates for the use of biotechnology in Africa as a means toward higher productivity,⁶⁴ a measure that would threaten the continent's trade portfolio but benefit large corporate players like Monsanto and Cargill by opening markets for expensive GM seeds and outlets for the global grain trade.

Trade

The Farm Bureau has been a vocal endorser of bilateral trade agreements with Colombia, Panama, Peru and Korea,⁶⁵ and claims to have been influential in passing the North American Free Trade Agreement (NAFTA).⁶⁶

This support is rooted in a free-trade mantra that dismisses a country's right to reject imports that are unsafe.⁶⁷

In 2006, the Farm Bureau signed on with Cargill, Dow Chemical and other major corporations in asking that "permanent normal trade relations" status be given to Vietnam, which would grant it accession to the World Trade Organization (WTO).⁶⁸ The Farm Bureau, alongside Monsanto,⁶⁹ supported China's accession to the WTO in 2001,⁷⁰ which has given China a platform to ramp up exports of food to the United States — a decision that seems unwise in view of the frequent headlines about unsafe Chinese imports.

Although pro-trade groups like the Farm Bureau contend that America farmers can benefit from the new export opportunities that these trade agreements provide, the flood of cheap imports have overwhelmed American agriculture. For example, Food & Water Watch found that since NAFTA and the WTO went into effect, fresh fruit and vegetable imports increased by 150 percent but exports of fruits and vegetables only grew by 4 and 14 percent respectively.⁷¹ These imported farm goods are often produced under weaker environmental, labor and food safety standards, which give overseas agribusinesses and multinational corporations an advantage over U.S. farmers. Between 1998 and 2007, the cultivation of fruits and vegetables has fallen by more than 10 percent in the United States, in no small part because of the influx of low-priced imports.⁷²

Labeling

As country of origin labeling (COOL) rules were due to be implemented following the 2002 Farm Bill, the Farm Bureau mostly opposed this new labeling requirement for meat, siding with a handful of multi-national corporate meat packers who want to sell foreign products without labeling. While consumers and independent American ranchers overwhelmingly supported COOL, the Farm Bureau stood with major corporate players like Wal-Mart⁷³ and Cargill.⁷⁴ Though the Farm Bureau came out in support of mandatory labeling in 2008, the year it was enacted, the organization opposed mandatory labeling in the second half of 2007, during which time it spent close to two million dollars lobbying on measures including COOL.⁷⁵ The Farm Bureau's flip-flopping on COOL between 2002 and 2008 may have contributed to the delay and weakening of the labeling rules going into effect. Other agricultural organizations, such as the National Farmer's Union, consistently supported the legislation for years without backpedaling.⁷⁶

Making Farmers Pay for Agribusiness Advertising

In 2004, the Supreme Court heard arguments from thousands of beef producers challenging the beef checkoff, a government-endorsed marketing program funded by ranchers, who are compelled to pay \$1 for every head of cattle they sell. The legal battle emerged when ranchers, who had paid \$1 billion into the checkoff, petitioned the USDA with 145,000 signatures, asking for relief from the program they felt did not effectively promote their products.⁷⁷

Corporate meatpackers likely benefit enormously from the billion-dollar advertising campaign that the checkoff provides (including the long-running "Beef: It's What's For Dinner" campaign), but these meatpackers are not required to pay into it, a main sticking point in the legal battle. The American Farm Bureau Federation and 28 of its state bureaus filed a friend of the court brief to the Supreme Court hearing that argued for a continuation of the checkoff, which would benefit these meatpackers.⁷⁸ Two lower courts sided in favor of the ranchers, but when one of these decisions reached the Supreme Court on appeal, the Court overturned it, allowing the original checkoff program to remain in effect.⁷⁹

National Animal Identification System

An elaborate, costly government initiative meant to address the potential economic damage that mad cow disease or other animal diseases could cause the American meat industry, the National Animal Identification System (NAIS) has failed to capture farmer support despite a five-year, \$127 million investment by government.⁸⁰ The USDA has had trouble implementing NAIS because of resistance in the livestock industry — especially from small ranchers and farmers who say the costs of the program could bankrupt them. The Farm Bureau, while taking varying stances on the program, has partnered with private technology compa-

nies to create operating systems that could reap the financial windfall that would unfold under NAIS.⁸¹ At one point, a state-level Farm Bureau boasted that it was primed to capitalize on 24 percent of the market through its technology offerings.⁸²

Absent When It Counts

As telling as the policies the Farm Bureau endorses are the policies it does not. The Farm Bureau frequently refrains from taking a stance — or employing its substantial political influence — on issues that would really help the incomes and welfare of many American farmers.

For example, in Spring 2010, the Department of Justice (DOJ) and the USDA launched an unprecedented joint examination into the impact of concentration in agricultural markets,⁸³ looking at the dozen or so mega-corporations that control the vast majority of seed, livestock and crop markets in America. It is many of these same corporations that the Farm Bureau regularly partners with and stands beside in courtrooms, statehouses and Capitol Hill.

At the kickoff of the landmark DOJ/USDA hearings, attended by the secretary of agriculture and the Attorney General of the United States, the Farm Bureau has kept a very low profile. The organization had no official representation on the first two of the event's panels,⁸⁴ and of the 15,000 comments submitted from the public, the Farm Bureau appears to have made only a handful. The American Farm Bureau's news group didn't even release a press release on the first two hearings to inform its members that they were happening.⁸⁵





The Iowa Farm Bureau's comment on the first hearing, which was held in Iowa, took a very middling criticism of concentration in agricultural markets, striking a tone that seemed more conciliatory than critical of the conditions that have put farmers all over the country in dire economic straits. It stated "...consolidation and concentration in agriculture is not always per se a negative event."⁸⁶

For an issue as critical to independent farmers as corporate concentration and loss of competitive markets, the Farm Bureau's relative absence speaks volumes about whose voice in agriculture they represent.

Conclusion

With a membership roster padded with non-farmers, an entrenched relationship with corporate agribusiness and an army of lobbyists, the real identity of the Farm Bureau is quite different from the down-home, salt-of-the-earth image that the group's massive public relations campaign peddles.

Masquerading as a farming organization that works in the interests of farmers, the Farm Bureau far too often stands tall with its rich corporate friends, while small farms and rural communities watch their markets, their prices and their livelihoods disappear. A vocal proponent of agriculture policy that hurts American growers and consumers, the Farm Bureau has consistently shown itself to be a better friend to corporate food producers than family farmers.

Though the mighty Farm Bureau has come under scrutiny by Congress, the Internal Revenue Service and media many times before, the organization's finances — and its role in influencing agricultural policy — deserves a fresh look by these same entities.

For the time being, the organization continues to use its billion-dollar clout to buy political influence on everything from voting rights to health insurance to water quality. For far too long, trade organizations representing corporate agribusiness have co-opted the production of food in this country, promoting an unhealthy industrial model.

(Endnotes)

- 1 American Farm Bureau Federation. "Voice of Agriculture" is prominently displayed at homepage Web site and most of the organization's documents.
- 2 The American Farm Bureau Federation, also known as the Farm Bureau, is a national organization that also has "affiliate" companies such as FBL Financial Group and ALFA Insurance. In addition to the national American Farm Bureau Federation, there are state Farm Bureau organizations in all 50 states and Puerto Rico, which are members of the American Farm Bureau Federation, and thousands of county-level bureaus.
- 3 Food and Water Watch Analysis of Center for Responsive Politics' lobbying database www.opensecrets.org. Accessed June 10, 2010; AND Food and Water Watch Analysis of National Institute on Money in State Politics' lobbying and campaign contribution database, www.followthemoney.org. Accessed June 1, 2010. Farm Bureau had 249, 190 and 129 lobbyists in 2007, 2008 and 2009 respectively in state lobbying. Farm Bureau had dozens more lobbying on the federal level; AND IRS 990. Iowa Farm Bureau Federation. 2007 at Part I, Line 21 and Statement 26; AND IRS 990. Missouri Farm Bureau Federation. 2007 at Schedule R, Part IV; AND IRS 990. Illinois Agricultural Association. 2007 at Part IX. (Includes combined assets (including taxable subsidiaries) of Illinois, Iowa and Missouri Farm Bureaus)
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- 5 American Farm Bureau Federation. "Farm bureau: Historical Highlights, 1919-1994." Available at <http://www.fb.org/index.php?fuseaction=about.history> and on file. Accessed May 17, 2010; AND EPA. "Ag 101." Available online at <http://www.epa.gov/oe-caagct/ag101/demographics.html> and on file. Accessed May 25, 2010.
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- 9 USDA RMA. "FY Government Cost for Federal Crop Insurance, 2001-09." Available at <http://www.rma.usda.gov/about/rma/budget/fycost2001-09-1.pdf> and on file. Accessed May 17, 2010.
- 10 Farm Bureau Mutual Insurance Company. "Annual Statement." 2008.

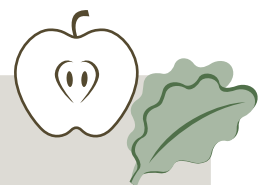
- 11 USDA RMA. "Frequently Asked Questions: Biotech Yield Endorsement." January 5, 2010. Available online at <http://www.rma.usda.gov/help/faq/bye.html> and on file. Accessed March 12, 2010.
- 12 Sengupta, Somini. "On India's Farms, a Plague of Suicide." *New York Times*. September 19, 2006.
- 13 Testimony of Bob Stallman and Michael Robichaux to US House of Representatives, House Committee on Agriculture. 111th Congress. "Serial No. 111-9: Review of Producers' Views on the Effectiveness of the Federal Crop Insurance Program — Subcommittee on General Farm Commodities and Risk Management." April 22, 2009.
- 14 American Agricultural Insurance Company. Annual Report. 2008 at 2; AND American Agricultural Insurance Company. Annual Report. 2009. At 5, 12-13. Calculation based on p.12-13. (13.93% of gross written premiums (\$968,456,906) is \$134,906,047)
- 15 Farm Bureau Mutual Life Insurance Company. 2009 Annual Statement. At Schedule Y, Part 1, Organizational Chart; AND Iowa Farm Bureau. IRS 990 form 2007. At Statement 26.
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- 33 Growmark. "Business Relationships and Cooperative Involvement." Available online at http://www.growmark.com/partners/partners_alliances.htm and on file. Accessed May 17, 2010; AND Growmark. "Growmark History." Available at [A photograph showing a man wearing a dark cowboy hat and a white t-shirt, holding a young child in his arms. They are standing in a field of tall, golden-brown grass. In the background, a hillside is visible with several rows of dark hay bales. The scene is lit with warm, golden light, suggesting late afternoon or early morning.](http://www.growmark.com/gmk-</p>
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