

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

State of Minnesota,
by and through its Attorney General
Keith Ellison,

Plaintiffs,

v.

United States Department of Agriculture,
and Brooke Rollins, as Secretary of the
Department of Agriculture,

Defendants.

Case No.: _____

**DECLARATION OF
Ling Becker**

I, Ling Becker, declare under penalty of perjury:

1. I make this declaration in good faith based on my knowledge of the facts set forth herein.

2. I am the Ramsey County Manager. As County Manager, I am the chief administrative officer of the county and am responsible for the proper administration of the affairs of the County, including all county departments.

3. Ramsey County is a political subdivision of the State of Minnesota with its county seat in Saint Paul. Home to more than 550,000 people and located in the seven-county Twin Cities metropolitan area, Ramsey County communities are nationally known as attractive, livable places rich in history, diversity and opportunity. Ramsey County is the second-most populous county in Minnesota with about 10 percent of the state's

residents, as well as one of the state's most racially and socioeconomically diverse counties.

Supplemental Nutrition Assistance Program (“SNAP”)

4. In Minnesota, SNAP is county-administered and state-supervised program, meaning county staff process SNAP applications, recertify SNAP cases and other tasks as needed to help residents receive SNAP benefits after they have submitted the state application. In Ramsey County, the Financial Assistance Services Department staff complete these tasks.

5. As of November 2025, Ramsey County had approximately 34,000 active SNAP cases, for 58,131 beneficiaries. Ramsey County recertifies the vast majority of its SNAP cases every 12 months but those with regular income are required to be recertified every six months.

USDA Pilot

6. The USDA Pilot announced in the December 16, 2025, letter to Governor Walz demands all SNAP households in Ramsey County be recertified in 30 days. It is not possible for Ramsey County do so.

7. Ramsey County typically processes 2,800 SNAP recertifications per month and has 117 county staff trained to do so who are not already assigned to other legally mandated benefits programs like Medicaid. By comparison, to recertify all of Ramsey County's 34,000 SNAP cases in 30 days, the county would need to process 1,133 recertifications per day. To do so would require 354 staff members working 30 days at full

time because each recertification takes approximately two hours. Ramsey County does not have 354 staff members available or trained to do such work, even if we re-directed staff from other programs. A number of the 117 staff who are trained in SNAP, have the necessary system access, and are not already assigned to other functions would be out of office at some point during the 30-day period, given that two weeks of it is during the holiday season.

8. Even if Ramsey County could reassign all of its employees who are trained to complete SNAP recertifications during this period, it would be impossible to complete the requisite amount of SNAP recertifications if they worked eight hours a day, every day during the demand period (including weekends and holidays). And this would have to assume that every single recertification application could be processed without any issues, which is inaccurate. Simply, USDA's 30-day timeline also does not provide sufficient time to train other staff, who would need to halt their current work, to complete recertifications.

9. Re-assigning staff would also halt work on other programs mandated by state and federal law. The Financial Assistance Services Department administers Medicaid, Minnesota Family Investment Program, Divisionary Work Program, Child Care Assistance Program, General Assistance and Minnesota Supplemental Aid (MSA) and Housing Support. Stopping work in these areas would cause county residents to lose access to these vital benefits.

10. The pilot also raises significant logistical barriers beyond staffing. For example, the USDA letter indicates an in-person interview is required. But arranging for 34,000 residents coming for an in-person interview to county buildings over the course of

a 30-day period would be an enormous task, requiring significant resources from across the county. In-person interviews are not currently required and will also increase the time required for each recertification, without increasing the accuracy of the recertification. We believe SNAP recipients would be hesitant to respond to a demand for an in-person interview, especially when published policy only requires recertification every 12 months and explicitly does not require in-person interviews. Our residents are already visiting our in-person service centers at lower rates, which we attribute in part to Immigration and Customs Enforcement action in the twin cities area.

11. It takes approximately two hours of staff time to complete a recertification, but crucially that time is not consecutive because staff must wait for SNAP recipients to respond to requests to verify income and other information or to arrange for a phone interview. The request for verification is required to be mailed and it takes time to print, mail, and wait for the client's response. Once verifications are returned, staff must enter the information into the system to determine final eligibility.

12. Many SNAP recipients would not receive notification of the recertification or requests for verifications because they use General Delivery for mailing or they may not act upon them promptly enough during the 30-day period, causing them to lose vital SNAP benefits because of procedural burdens rather than actual ineligibility.

13. The consequences of this pilot of this go beyond internal logistics and staffing. USDA's letter threatens to stop all SNAP funding to Minnesota if the pilot is not completed, leaving 58,000 of our county residents without SNAP benefits to which they are currently eligible. However, completing the pilot is not possible within 30 days.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

s/ Ling Becker
Ling Becker

Dated: December 23, 2025
County of Ramsey, State of Minnesota