

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

NATURAL RESOURCES DEFENSE COUNCIL,
INC.; CENTER FOR BIOLOGICAL DIVERSITY;
FRIENDS OF MINNESOTA SCIENTIFIC AND
NATURAL AREAS,

Plaintiffs,

v.

UNITED STATES FISH AND WILDLIFE
SERVICE, MARTHA WILLIAMS, in her official
capacity as Principal Deputy Director of the
U.S. Fish and Wildlife Service; UNITED STATES
DEPARTMENT OF THE INTERIOR,

Federal Defendants.

Civ. No. 1:21-cv-00770-ABJ

DECLARATION OF GINA TRUJILLO

I, Gina Trujillo, declare as follows:

1. I am the director of Membership at the Natural Resources Defense Council, Inc. (“NRDC”). I have been the director of membership since January 1, 2015, and have worked at NRDC in the membership department for more than twenty-five years.
2. My duties include supervising the preparation of materials that NRDC distributes to members and prospective members. Those materials describe NRDC and identify its mission.
3. NRDC is a membership organization incorporated under the laws of the State of New York. It is recognized as a not-for-profit corporation under Section 501(c)(3) of the United States Internal Revenue Code.
4. NRDC’s mission statement declares that: “NRDC works to safeguard the earth—its people, its plants and animals, and the natural systems on which all life depends.”

5. Since its inception in 1970, NRDC has worked on issues relating to wildlife conservation. In particular, protecting threatened and endangered wildlife species is central to NRDC's purpose. NRDC brings cases to protect its members' interests in preserving wildlife species and preventing threatened habitat destruction.

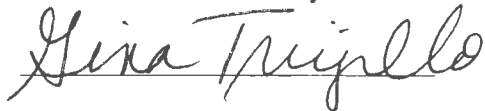
6. NRDC currently has more than 327,000 members. There are NRDC members residing in each of the fifty United States and in the District of Columbia.

7. When an individual becomes a member of NRDC, his or her current residential address is recorded in NRDC's membership database. When a member renews his or her membership, or otherwise makes a contribution to NRDC, the database entry reflecting the member's residential address is verified or updated.

8. As of November 17, 2021, the two declarants identified by NRDC in the above captioned manner—Clay Bolt and Jason Taylor—are current members of NRDC according to NRDC's membership database.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief

Executed on this 17 day of November, 2021 in Katonah, NY

A handwritten signature in cursive script that reads "Gina Trujillo". The signature is written in black ink and is positioned above the printed name.

Gina Trujillo