

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

CLIMATE UNITED FUND, Plaintiff, v. CITIBANK, N.A., <i>et al.</i> , Defendants.	Case No. 1:25-cv-00698 (TSC)
COALITION FOR GREEN CAPITAL, Plaintiff, v. CITIBANK, N.A., <i>et al.</i> , Defendants.	Case No. 1:25-cv-00735 (TSC)
POWER FORWARD COMMUNITIES, INC., Plaintiff, v. CITIBANK, N.A., <i>et al.</i> , Defendants.	Case No. 1:25-cv-00762 (TSC)

DECLARATION OF DAN COOGAN

I, Dan Coogan, hereby declare as follows:

1. I am the Deputy Assistant Administrator for Infrastructure and Extramural Resources in the United States Environmental Protection Agency (EPA)'s Office of

Mission Support (OMS). In this role, I am responsible for the acquisitions, grants, and facility operations and management that support EPA's mission. Prior to this role, I managed a \$900 million budget and 1,400 full-time equivalent (FTE) employees as the Director of the Office of Resource and Business Operations within OMS.

2. Attached as **Exhibit A** is a copy of the Notice of Award between Climate United and the EPA, issued August 8, 2024, and amended on December 20, 2025 and again in January 2025, redacted to conceal Climate United's private account and contact information.

3. Attached as **Exhibit B** is a copy of the Account Control Agreement (ACA) executed by Treasury, Climate United and EPA on November 1, and amended January 13, 2025, redacted to conceal Climate United's private account and contact information.

4. Attached as **Exhibit C** is an unaltered copy of EPA's March 2, 2025 letter from EPA's Office of Inspector General.

5. Attached as **Exhibit D** is a copy of EPA's March 4 letter to Climate United Fund, redacted to conceal Climate United's CEO contact information.

6. Attached as **Exhibit E** is a copy of Citibank's March 6, 2025 letter to EPA, redacted to conceal Climate United and third-party contact information.

7. Attached as **Exhibit F** is an unaltered copy of EPA's March 8, 2025 letter to Citibank.

8. Attached as **Exhibit G** is a copy of Treasury's March 10, 2025 email to Citibank, redacted to conceal contact information.

9. Attached as **Exhibit H** is a copy of Treasury's March 10, 2025 email to Citibank, redacted to conceal contact information.

10. Attached as **Exhibit I** is a copy of EPA's March 11, 2025 letter terminating Climate United's grant funding, redacted to conceal Climate United's CEO contact information.

I HEREBY DECLARE TO THE BEST OF MY KNOWLEDGE AND BELIEF,
UNDER PENALTY OF PERJURY under the laws of the United States of America, that
the foregoing is true and correct.

EXECUTED this 26th day of March, 2025 at Washington, DC.

Dan Coogan