

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

CLIMATE UNITED FUND,

Plaintiff,

v.

CITIBANK, N.A., *et al.*,

Defendants.

Case No. 1:25-cv-00698 (TSC)

COALITION FOR GREEN CAPITAL,

Plaintiff,

v.

CITIBANK, N.A., *et al.*,

Defendants.

Case No. 1:25-cv-00735 (TSC)

POWER FORWARD COMMUNITIES, INC.,

Plaintiff,

v.

CITIBANK, N.A., *et al.*,

Defendants.

Case No. 1:25-cv-00762 (TSC)

**DECLARATION OF GREGG TREML**

I, Gregg Trembl, hereby declare as follows:

1. I am the Acting Chief Financial Officer of the United States Environmental Protection Agency (EPA). I have held this position since January 20, 2025. In this

position, I am responsible for overseeing the EPA's annual budget, annual performance plans, financial operations, financial information systems, and directing strategic planning and financial policy development efforts. Prior to this role, my permanent role is Deputy Chief Financial Officer, which I held since June 2023. Before joining the EPA, I served as Assistant Inspector General and Deputy CFO of the Department of Health and Human Services Office of Inspector General and held a series of budget, financial, and human-resources leadership roles at the Federal Emergency Management Agency, General Services Administration, and Department of Homeland Security dating back to 2008.

2. As evidenced by the attached documents, the three former grantees in the EPA's National Clean Investment Fund (NCIF) program—Climate United Fund, Coalition for Green Capital, and Power Forward Communities, Inc., have sent letters to Citibank instructing the Bank to immediately process pending disbursement requests without delay upon issuance of a preliminary injunction.

3. As evidenced by the attached documents, the former NCIF grantees and certain former grantees in the EPA's Clean Communities Investment Accelerator (CCIA) have filed disbursement requests with Citibank for approximately \$700,000,000 in transfers, approximately \$625,000,000 of which constitute transfers to external accounts, based on the terminated NCIF and CCIA grant agreements.

4. The EPA will be irreparably harmed by the transfer of at least \$625,000,000 in funds from Citibank to external accounts controlled solely by the former grantees. The EPA cannot readily recoup the funds once transferred outside accounts administered by Citibank as the designated financial agent.

5. The EPA will be irreparably harmed by a continuation of the temporary restraining order's bar on implementing termination. The EPA cannot proceed to complete the closeout process and reobligate the funds within a restructured Greenhouse Gas Reduction Fund (GGRF) program that reflects the agency's priorities and ensures greater accountability while this bar remains in effect. The EPA and potential future grantees cannot be made whole for this delay after the fact. Furthermore, the bar on implementing termination deprives the government of significant interest and income on the billions of dollars of unspent funds that could otherwise be used within the program. The EPA cannot readily recoup these lost additional funds after the fact.

6. Attached as **Exhibit A** is a true and correct copy of an April 3, 2025 letter from Climate United Fund's attorney instructing Citibank to prepare to disburse funds immediately to Climate United in anticipation of the dissolution of the temporary restraining order and entry of a preliminary injunction.

7. Attached as **Exhibit B** is a true and correct copy of an April 4, 2025 letter from Coalition for Green Capital's attorney instructing Citibank to prepare to disburse funds immediately to Coalition for Green Capital in anticipation of the dissolution of the temporary restraining order and entry of a preliminary injunction.

8. Attached as **Exhibit C** is a true and correct copy of an April 7, 2025 letter from Power Forward Communities, Inc.'s attorney instructing Citibank to prepare to disburse funds immediately to Power Forward in anticipation of the dissolution of the temporary restraining order and entry of a preliminary injunction.

9. Attached as **Exhibit D** is a true and correct copy of a March 11, 2025 Form of Account Direction requesting the external transfer of \$300,000.00 from Citibank to Climate United Fund.

10. Attached as **Exhibit E** is a true and correct copy of a March 24, 2025 Form of Account Direction requesting the internal transfer of \$75,000,000.00 in Climate United Fund accounts held at Citibank.

11. Attached as **Exhibit F** is a true and correct copy of an April 2, 2025 Form of Account Direction requesting the external transfer of \$604,455.69 from Citibank to Climate United Fund.

12. Attached as **Exhibit G** is a true and correct copy of an April 2, 2025 Form of Account Direction requesting the external transfer of \$75,000,000.00 from Citibank to Climate United Fund.

13. Attached as **Exhibit H** is a true and correct copy of an April 2, 2025 Form of Account Direction requesting the external transfer of \$42,250,000.00 from Citibank to Climate United Fund.

14. Attached as **Exhibit I** is a true and correct copy of an April 3, 2025 Form of Account Direction requesting the external transfer of \$250,000,000.00 from Citibank to Climate United Fund.

15. Attached as **Exhibit J** is a true and correct copy of an April 7, 2025 Form of Account Direction requesting the external transfer of \$175,436.25 from Citibank to Power Forward Communities.



16. Attached as **Exhibit K** is a true and correct copy of an April 7, 2025 Form of Account Direction requesting the external transfer of \$521,267.00 from Citibank to Inclusiv, Inc.

17. Attached as **Exhibit L** is a true and correct copy of an April 7, 2025 Form of Account Direction requesting the external transfer of \$185,237.08 from Citibank to Power Forward Communities.

18. Attached as **Exhibit M** is a true and correct copy of an April 7, 2025 Form of Account Direction requesting the external transfer of \$315,379.58 from Citibank to Appalachian Community Capital.

19. Attached as **Exhibit N** is a true and correct copy of an April 8, 2025 Form of Account Direction requesting the external transfer of \$1,574,811.00 from Citibank to Power Forward Communities, Inc.

20. Attached as **Exhibit O** is a true and correct copy of an April 9, 2025 Form of Account Direction requesting the external transfer of \$1,747,492.96 from Citibank to Climate United Fund.

21. Attached as **Exhibit P** is a true and correct copy of an April 10, 2025 Form of Account Direction requesting the external transfer of \$18,505.54 from Citibank to Climate United Fund.

22. Attached as **Exhibit Q** is a true and correct copy of an April 14, 2025 Form of Account Direction requesting the external transfer of \$428,390.76 from Citibank to Opportunity Finance Network.

23. Attached as **Exhibit R** is a true and correct copy of an April 15, 2025 Form of Account Direction requesting the external transfer of \$234,887.50 from Citibank to Climate United Fund.

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 15th day of April, 2025 at Washington, DC.

  
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Gregg Trembl