

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

CLIMATE UNITED FUND

Plaintiff,

v.

CITIBANK, N.A., UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY,
and LEE ZELDIN, in his official capacity as
ADMINISTRATOR, UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

Defendants.

Case Nos. 1:25-cv-00698 (TSC)

DECLARATION OF PHILLIP SCHINDEL

I, Phillip Schindel, hereby declare as follows:

1. I am the Acting Director of the Grants Management and Business Operations Division of the United States Environmental Protection Agency (EPA). I have held this position since December 29, 2024. In this position, I am responsible for providing business direction for the management of grants and cooperative agreements, including record management, overseeing grant files, grants IT system development, and grants administration program implementation determinations. Prior to this role, I have worked at the EPA for the last 22 years, including serving as a Branch Chief for Business Operations in 2024, and Branch Chief in charge of Interagency Agreements from 2021 to 2023.

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 12th day of March, 2025 at Washington, DC.


Phillip K. Schindel