

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AGUA CALIENTE BAND OF)
CAHUILLA INDIANS, <i>et al</i> ,)
)
)
Plaintiffs,)
)
v.)
)
STEVEN MNUCHIN, in his official)
Capacity as the Secretary of the United)
States Department of Treasury,)
)
)
Defendant.)

Case No. 1:20-cv-01136

DECLARATION OF ROBERT M. DE LOS ANGELES

I, Robert M. de los Angeles, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the elected Chairman of the Snoqualmie Indian Tribe.
2. The statements herein are based on my own personal knowledge obtained within the scope of my role as Chairman of the Tribal Council, and I could testify competently to them if called upon to do so.
3. The Snoqualmie Indian Tribal Reservation comprises +/- 52 acres of land located in Snoqualmie, Washington with approximately 480 enrolled tribal members. The Tribe also owns various parcels of land off-Reservation in fee simple status.
4. The Tribe provides governmental services throughout the Reservation and on behalf of its Tribal members including planning and development services, environmental regulatory services, building inspection services, services, law enforcement and judicial services,

health and welfare services, educational programs, and social and cultural preservation facilities and programs.

5. The Tribe employs over 1500 people. The Tribe's business enterprises on the Reservation include the Snoqualmie Casino and the Crescent Market gasoline and convenience store. The Tribe also owns two off-Reservation businesses: the Salish Lodge & Spa and Eighth Generation, a Native arts retail store. All of these entities are closed and have been since mid-March 2020.

6. The Tribe has taken emergency protective measures and incurred substantial additional expenses to address the COVID-19 crisis. The Tribe has procured additional personal protective equipment (PPE) for distribution to Tribal members and Tribal staff; procured and distributed water and toilet paper to Tribal members; increased spending on cleaning and sanitation supplies including washing stations and thermometers; incurred additional IT and professional services related expenses; incurred additional security expenses to secure closed facilities; and other assistance measures to meet medical and general welfare needs of its community during this pandemic. These emergency services are unbudgeted expenses.

7. As of April 29, 2020, there are 6182 confirmed COVID-19 cases and 436 related deaths in King County, Washington. The Reservation is approximately 17 miles from Kirkland, Washington, which was the initial epicenter of the COVID-19 outbreak in the United States.

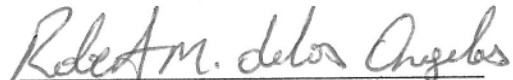
8. In response to the COVID-19 crisis, the Tribe declared a State of Emergency on March 11, 2020. It has placed many non-essential employees on leave or furlough, and have closed all commercial enterprises. The closure of these enterprises has eliminated the Tribe's primary source of governmental revenue for essential governmental services and employee salaries.

9. The Tribe filed its certification of tribal data on or before the April 17, 2020 deadline to receive emergency relief funding from the CARES Act.

10. As of May 1, 2020, the Tribe has not received emergency relief funding from the CARES Act.

11. If the Tribe does not receive the emergency relief funding from the CARES Act immediately, it will be forced curtail essential governmental services and lay off or furlough a substantial number of employees.

Executed this 1st day of May, 2020.


Chairman Robert M. de los Angeles