

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

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No. *1777*
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Karen B. Molzen

RIO GRANDE SILVERY MINNOW (*Hybognathus*))
amarus); SOUTHWESTERN WILLOW FLYCATCHER)
(*Empidonax trailii extimus*); DEFENDERS OF)
WILDLIFE; FOREST GUARDIANS; NATIONAL)
AUDUBON SOCIETY; NEW MEXICO AUDUBON)
COUNCIL; SIERRA CLUB; and SOUTHWEST)
ENVIRONMENTAL CENTER,)

Plaintiffs,)

vs.)

ELUID L. MARTINEZ, Director, Bureau of)
Reclamation; MICHAEL R. GABALDON, Regional)
Director, Bureau of Reclamation; BUREAU)
OF RECLAMATION, an agency of the United)
States; GEN. JOSEPH BALLARD, Chief Engineer,)
Army Corps of Engineers; LT. COL. TOM)
FALLIN, Albuquerque District Engineer;)
U.S. ARMY CORPS OF ENGINEERS, an agency of)
the United States,)

Defendants.)

COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF