

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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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