IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BUTTE DIVISION

COTTONWOOD ENVIRONMENTAL LAW CENTER, et al.) Case No. 2:21-CV-00093-BMM)
Plaintiffs, vs.	DECLARATION OF TOM ELFMONT
YELLOWSTONE MOUNAIN CLUB, LLC)))
Defendant.)))

- I, Tom Elfmont, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- 1. I have personal knowledge of the matters stated herein and, if called as a witness, would competently testify.
- 2. I submit this declaration on my own behalf and as a member of Cottonwood Environmental Law Center (Cottonwood).
- 3. I am a resident of Bozeman, Montana.
- 4. I have been a member of Cottonwood for about a year.

- 5. I am the former police captain of the Los Angeles Police Department and now run a private investigation firm. I did some research on Cottonwood before I donated money to them and became a member. I became a member of Cottonwood because they stand up to money to protect the environment. There are not many groups like Cottonwood in the United States.
- 6. I whitewater rafted the Gallatin River during the summer of 2021 with other Cottonwood members. I have plans to whitewater raft the Gallatin River again during the Summer of 2022.
- 7. The Yellowstone Club's violations of the Clean Water Act harm my conservation interests in maintaining and restoring the water quality of the Gallatin River and its tributaries.
- 8. An injunction that stops the Yellowstone Club from building more vacation houses will maintain the existing water quality of the South Fork of the West Fork of the Gallatin River. Allowing the Yellowstone Club to continue building and adding new sewer connections will only exacerbate the already existing pollution problem and harm my conservation interests.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 9th day of December, 2021.

Tom Elfmont