

**DECLARATION OF FRANK JACKALONE  
SENIOR FIELD ORGANIZING MANAGER OF THE SIERRA CLUB**

1. My name is Frank Jackalone, I am over eighteen years of age and currently reside at 1863 Lakewood Drive South, St. Petersburg, Florida, 33712. St. Petersburg is in Pinellas County on Florida's Gulf Coast.

2. I currently hold the position of Senior Field Organizing Manager of the Sierra Club. In this capacity, I manage all Sierra Club staff and offices in Florida and Puerto Rico.

3. Sierra Club is a non-profit public benefit corporation with its principal place of business in San Francisco, California. Sierra Club consists of members living throughout the state and around the nation.

4. There are approximately 30,000 members living in the State of Florida many of whom reside in counties that border the Gulf of Mexico including counties in the Florida Panhandle whose waters and beaches are currently being adversely affected by oil from the BP Deepwater Horizon oil spill.

5. Members and staff of Sierra Club frequently use and enjoy the waters of the Gulf of Mexico and the estuarine and coastal waters that border Florida's Gulf Coast shoreline. These water provide an environment for a variety of activities which members of the Sierra Club engage in, including, but not limited to, wading, walking, swimming, canoeing, kayaking, sailing, sport boating, wildlife observation, photography, personal and commercial research, and sport fishing.

6. Members and staff of Sierra Club frequently use and enjoy Florida's Gulf Coast beaches. These beaches provide an environment for a variety of activities which

members of Sierra Club engage in, including, but not limited to, walking, wildlife observation, photography, and sport fishing.

7. The Sierra Club represents the interests of its members in state and federal litigation, public policy advocacy, administrative proceedings, and before state, local, and federal lawmakers. The Sierra Club is very involved in advocacy regarding issues related to oil drilling in the Gulf of Mexico and in keeping Gulf of Mexico waters free from pollution.

8. All of these activities support Sierra Club's mission to explore, enjoy, and protect the wild places of the earth and educate and enlist humanity to protect and restore the quality of the natural and human environment.

9. For decades, Sierra Club has worked to protect the environmental and ecological health of Florida's Gulf Coast waters and beaches. One of the primary threats to the ecological and environmental health of Florida's Gulf Coast is offshore drilling in the Gulf of Mexico. For that reason, Sierra Club has steadfastly supported the moratorium on drilling in the Eastern Gulf of Mexico and the ban on oil drilling in Florida's territorial waters.

10. The potential adverse environmental effects caused by Gulf of Mexico oil spills are immeasurable. Those adverse effects include the death of marine and terrestrial wildlife including endangered species, destruction of estuarine marshes which serve as nurseries for many of Florida's important sport and commercial fish species, and the devastation of Florida's world renowned white sand beaches.

11. The adverse environmental effects of oils spills directly and adversely affect the Sierra Club members' use and enjoyment of the waters of the Gulf of Mexico, Florida's

estuarine and coastal waters on the Gulf Coast, and their use and enjoyment of Florida's Gulf Coast beaches.

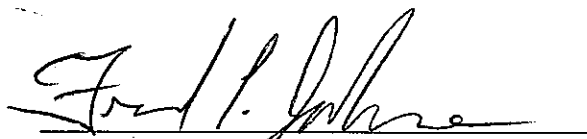
12. The public's interest is in keeping Gulf of Mexico waters oil free. Florida's waters and beaches are already being adversely affected by the BP Deepwater Horizon oil spill as is Sierra Club's members use and enjoyment of those waters and beaches.

13. Clean oil free water is critical to the preservation of Florida's marine and estuarine environment and to Florida's recreational fishing industry, commercial fishing industry, and tourism industry which depend on clean waters and clean beaches.

14. Allowing deep water offshore oil drilling to go forward without a thorough review of environmental risks presented by a worst case scenario blowout, without the development of adequate oil spill response plans, and without changes in safety regulations to reduce the chances of another uncontrolled blowout, puts a major part of Florida's economy at risk including its commercial and sport fishing industry.

I DECLARE under penalty of perjury under the laws of the United States and the laws of the State of Florida that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

  
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Frank Jackalone  
June 16, 2010  
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Date