

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

**ENVIRONMENTAL DEFENSE  
ALLIANCE, and  
WATERKEEPERS FLORIDA,**

Plaintiffs,

v.

Civil Action No.

**LEE M. ZELDIN**, in his official  
capacity as ADMINISTRATOR of  
the ENVIRONMENTAL  
PROTECTION AGENCY,

Defendant.

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**COMPLAINT**  
**DECLARATORY RELIEF REQUESTED**  
**PERMANENT INJUNCTIVE RELIEF REQUESTED**

**Nature of Action**

1. This action seeks a declaration that the Administrator of the Environmental Protection Agency has failed to perform a non-discretionary duty under the Clean Water Act and unlawfully withheld agency action under the Administrative Procedure Act. This action also seeks a permanent injunction ordering the Administrator of the Environmental Protection Agency to perform his nondiscretionary duty