

**Declaration of Liia Uustal,
Frontline Operations Administrator for Greenpeace**

I, Liia Uustal, do hereby declare:

1. I am the Frontline Operations Administrator for the non-profit corporation Greenpeace, Inc. Greenpeace is the leading independent campaigning organization that uses peaceful protest and creative communication to expose global environmental problems and to promote solutions that are essential to a green and peaceful future.

2. Since 2008, on at least a weekly basis, Greenpeace representatives educate the public about our mission while soliciting funds on the public sidewalks of what is now the no-solicitation zone in downtown Colorado Springs. Greenpeace's public education and fundraising model is predicated on the method of solicitation we use in Colorado Springs. As Greenpeace is an independent, fully member-driven non-profit, our canvass operations provide not only the financial support but also the public outreach needed to be successful.

3. When canvassing, Greenpeace sends out a team of four people to stand on the public sidewalks of areas with significant foot traffic. We direct our canvassers to take care not to block the sidewalk, entrances to buildings, or any pedestrians' right of way.

4. The canvassers engage passersby in voluntary two-way conversations about the environment and the mission and programs of Greenpeace. We direct our canvassers to be non-aggressive, not to follow individuals, and to never to block the way of any passersby. Typically, our canvassers attempt to start conversations by saying something to the effect of: "Let's have a conversation about Greenpeace's campaign."

5. When a passerby chooses to engage in conversation with a canvasser, the canvasser will spend some time educating the passerby on Greenpeace's mission. Then, the canvasser will encourage the passerby to join Greenpeace, which requires a donation to the

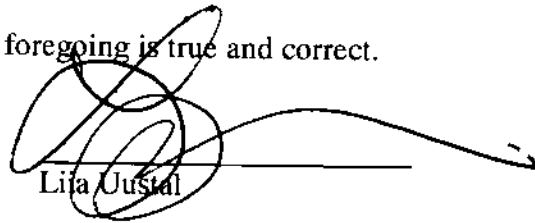
organization. If the passerby agrees, the canvasser then calls Greenpeace's phone center and assists that passerby in signing up as a member. The canvasser does not accept any cash donations. Once signed up as a member, the canvasser gives the member literature about Greenpeace's programs. This literature includes instructions on how the member may increase his or her donation to Greenpeace.

6. Greenpeace sends canvassers to downtown Colorado Springs in what is now the no-solicitation zone at least one time every week. Greenpeace chose the downtown area because of the high concentration of foot traffic. Greenpeace views its canvassing operation in Colorado Springs to be highly successful, meaning that on average compared with other parts of the country, a relatively high percentage of people in Colorado Springs engage in meaningful conversation with canvassers about Greenpeace's mission and choose to become members. This leads Greenpeace to believe that many people in the no solicitation zone want to engage in conversation with and give donations to Greenpeace.

7. Greenpeace believes it has a First Amendment right to spread the word about its work on public sidewalks to willing listeners and, when the listener so desires, to facilitate a contribution to the organization. Greenpeace wishes to continue its outreach and fundraising efforts in what is now the no-solicitation zone of downtown Colorado Springs. Now that the solicitation ban has passed, Greenpeace is forced to choose between: (a) following through on our outreach and fundraising plans while violating the ordinance; or (b) complying with the ordinance and foregoing the exercise of constitutional rights. Greenpeace should not have to make this choice.

I declare under penalty of perjury that the foregoing is true and correct.

11/21/12
Date


Lifa Jusfal