

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No.1:20-CV-03166-SKC

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN RAFTOPOULOS,  
DIAMOND PEAK CATTLE COMPANY, LLC,  
a Colorado Limited Liability Company, and  
RANCHO GRECO LIMITED, LLC,  
a Colorado Limited Liability Company.

Defendants.

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**NOTICE OF LODGING OF PROPOSED CONSENT DECREE**

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Plaintiff United States of America with this notice lodges with the Court a proposed consent decree that contains the terms of a proposed settlement of the claims alleged in the Complaint filed by the United States against John Raftopoulos, Diamond Peak Cattle Company, LLC, and Rancho Greco Limited Liability (collectively, "Defendants").

The United States and Defendants have reached a proposed settlement of all civil claims for injunctive relief, civil penalties, and damages alleged in the Complaint against Defendants for violations of Section 301 of the Clean Water Act, 33 U.S.C. § 1311, and sections 302, 303, and 310 of the Federal Land Policy and Management Act of 1976, 43 U.S.C. §§ 1732, 1733 and 1740, concerning property in Sections 33 and 34, Township 10 North, Range 102 West, and Section 3, Township 9 North, Range 102 West, in Moffat County, Colorado. A copy of the proposed consent decree is attached to this notice and hereby lodged with the Court.

The proposed consent decree should not be signed or entered by the Court at this time. In accordance with the requirements of 28 C.F.R. § 50.7, the proposed consent decree should not be entered by the Court until after the Department of Justice provides an opportunity to persons who are not named as parties to the action to comment on the proposed consent decree. *Id.* The Department of Justice will receive and consider any written comments relating to the proposed consent decree. The United States will then make an appropriate motion to the Court.

Respectfully submitted,

JEAN WILLIAMS  
Acting Assistant Attorney General  
Environment and Natural Resources  
Division

*s/ Alan D. Greenberg*

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*s/ Jacob Licht*

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Dated: March 18, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice of Lodging of Proposed Consent Decree was filed on March 18, 2021 through the Court's CM/ECF system, which will serve all registered counsel.

s/ Alan D. Greenberg  
ALAN D. GREENBERG