

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA**

LILLIAN EASLEY and all others)

similarly situated,)

Plaintiffs,)

v.)

WLCC II D/B/A)

ARROWHEAD ADVANCE,)

Defendants.)

DECLARATION OF RAYCEN RAINES

I, Raycen Raines, declare:

1. My name is Raycen Raines. I am over the age of majority, competent to testify, and have personal knowledge of the facts contained herein. The facts stated herein are true and correct, and if called and sworn as a witness, I could and would competently testify thereto under oath. I make this Declaration for any lawful use or purpose.

2. I am currently the Chief Executive Officer of Wakpamni Lake Community Corporation (“WLCC”).

3. WLCC is a tribal corporation organized under the laws of the Oglala Sioux Tribe.

4. WLCC’s principal place of business is in South Dakota.

5. WLCC was served with a copy of the Complaint on or around December 30, 2020.

6. From December 16, 2016 through the present, WLCC has made loans in the principal amount of less than \$1,500 to well over 100 individuals with Alabama addresses.

7. The value of the loans made from December 16, 2016 through the present exceeds \$5,000,000.

8. In addition, from December 2016 through the present, WLCC has received over \$4,600,000 in payments on those loans. This amount does not account for charged off principal amounts which exceeds \$1,000,000. The total amounts paid on the loans will continue to increase during the pendency of the litigation and will exceed \$5,000,000.

9. I declare under penalty of perjury under the laws of the State of Alabama and the laws of the United States of America that the foregoing is true and correct.

Dated: January 29, 2021

By:  _____
Raycen Raines