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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLIVEN D. BUNDY,
RYAN C. BUNDY,
AMMON E. BUNDY,
RYAN W. PAYNE,
PETER T. SANTILLI,
MEL D. BUNDY,
DAVID H. BUNDY,
BRIAN D. CAVALIER,
BLAINE COOPER,
GERALD A. DELEMUS,
ERIC J. PARKER,
O. SCOTT DREXLER,
RICKY R. LOVELIEN,
STEVEN A. STEWART,
TODD C. ENGEL,
GREGORY P. BURLESON,
JOSEPH D. O'SHAUGHNESSY,
MICAHA L. McGUIRE, and
JASON D. WOODS,

Defendants.

2:16-CR-00046-GMN-PAL

**GOVERNMENT'S MOTION FOR
PROTECTIVE ORDER AND
SUPPORTING MEMORANDUM**

1 The United States, by and through undersigned counsel, respectfully
2 submits this Memorandum in Support of its Motion for a Protective Order
3 pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, seeking to
4 prevent the dissemination of discovery materials and information outside the
5 defense team and for use only to assist the defense in the investigation and
6 preparation of this case.

7 INTRODUCTION

8 By this motion, the United States respectfully requests that the Court enter
9 a protective order pursuant to the authority provided in Rule 16(d) of the Federal
10 Rules of Criminal Procedure. Attached at Exhibit 1 is the government's Proposed
11 Protective Order (hereinafter "PPO").

12 During informal pretrial conferences, the government represented to
13 counsel for the defense that it intended to seek a protective order in this case to
14 limit the dissemination of discovery information outside the defense team. The
15 government circulated its Proposed Protective Order to counsel before the
16 scheduling and case management conference held by the Court on April 22, 2014.

17 At the scheduling conference, the government further represented to the
18 Court that the timing of the disclosure of Phase III of discovery was contingent, in
19 part, on whether a Protective Order is entered in this case. Following that
20 conference, the Court issued a Case Management Order (C.R. 321), allowing the
21 parties until April 29, to file their proposed protective orders or oppositions. This
22 filing constitutes the government's PPO and position.
23
24

1 Counsel for defendant Ricky Lovelien has indicated to government counsel
2 that he will agree to the PPO. Defendants Cliven Bundy and Dave Bundy
3 indicated to government counsel that they oppose the PPO and have filed
4 oppositions (C.R. 349 and 347, respectively). Scott Drexler (who expressed
5 reservations) and Ryan Bundy have thus far not provided a position. Ryan Payne
6 has filed an opposition (C.R. 331) that was joined by Jason Woods (C.R. 337),
7 Joseph O'Shaughnessy (C.R. 340), and Ammon Bundy (C.R. 331). Ammon Bundy
8 also filed a separate opposition (C.R. 333) that was joined by Jason Woods (C.R.
9 338) and Brian Cavalier (C.R. 348). Peter Santilli filed an opposition (C.R. 315)
10 that was joined by Mel Bundy (C.R. 335), Gerald Delemus (C.R. 322), Steven
11 Stewart (C.R. 326), Todd Engel (C.R. 325), Gregory Burleson (C.R. 328) and Micah
12 McGuire (C.R. 330).

13 GOVERNMENT'S POSITION

14 Rule 16(d) provides that the district court may, for good cause, deny,
15 restrict or defer discovery or inspection or grant other relief including the issuance
16 of protective order. A protective order that limits a criminal defendant's
17 disclosure of discovery materials is an appropriate use of the court's discretion.
18 *Alderman v. United States*, 394 U.S. 165, 185 (1969) ("[T]he trial court can and
19 should, where appropriate, place a defendant and his counsel under enforceable
20 orders against unwarranted disclosure of the materials which they may be
21 entitled to inspect."); *see also United States v. Campa*, 529 F.3d 980, 995 (11th Cir.
22 2008) (recognizing "[t]he broad authority of the district court to regulate
23 discovery" in a criminal case); *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 36
24

1 (1984) (noting that the “trial court is in the best position to weigh the fairly
2 competing needs and interests of the parties affected by discovery. The unique
3 character of the discovery process requires that the trial court have substantial
4 latitude to fashion protective orders.”). *See also United States v. W.R. Grace*, 526
5 F.3d 499, 509 (9th Cir. 2008) (en banc) (District courts “have inherent power to
6 control their dockets.”) (quoting *Atchison, Topeka & Santa Fe Ry. Co. V. Hercules*
7 *Inc.*, 146 F.3d 1071, 1074 (9th Cir. 1998)).

8 The transmission and use of discovery is meant to be a private process
9 between the litigants and that discovery materials should generally not be
10 disclosed outside of those individuals who are necessary for preparation for trial.
11 *United States v. Anderson*, 799 F.2d 1438, 1441 (11th Cir. 1986) (“Discovery,
12 whether civil or criminal, is essentially a private process because the litigants and
13 the courts assume that the sole purpose of discovery is to assist trial preparation.
14 That is why parties regularly agree, and courts often order, that discovery
15 information will remain private.”).

16
17 In this case, the government seeks a protective order to protect victims,
18 witnesses, law enforcement officers, and agent/investigators associated with this
19 case from threats, intimidation, and harassment from supporters of the Bundy
20 defendants. The history of this case shows that Bundy supporters used various
21 social media outlets such as YouTube, Twitter, and Facebook to threaten and
22 intimidate law enforcement officer/witnesses/victims in connection with
23 impoundment operations at Bundy Ranch and thereafter. At Exhibit 2, the
24 government has compiled but a few examples of the cyber-bullying tactics used by

1 Bundy supporters, redacting personal identifying information and images where
2 necessary (redactions depicted by black boxes).

3 One such example is an April 13, 2014, post on the “Stand with the Bundys”
4 Facebook page. There, a supporter posted an image of a BLM Ranger involved in
5 impoundment operations together with his home telephone number and the
6 message: “A participant in this week’s Bundy escapade . . . BLM Ranger [name
7 redacted] Home [address redacted].” Exhibit 2, Example # 5. Thereafter, others
8 posted the following to the same page:

9 [poster name redacted]: Call him from a land line

10 [name redacted/different poster]: Do a reverse look up of his number you
11 will be surprised

12 [name redacted/different poster]: St. George UT is where this number is
13 from

14 [name redacted/different poster]: I know my people in St. George won’t be
happy about that. I will definitely share this!!!!

15 As these posts show, supporters of the Bundys used social media to discover
16 information about a law enforcement officer and then released the information to
17 others, calling for others to harass their victim with pointless and threatening
18 telephone calls, and seeking still others (“my people in St. George”) who lived near
19 their victim to join in their bullying tactics to intimidate and make it
20 uncomfortable for the victim. The tactics employed by Bundy supporters were not
21 limited to law enforcement officers, but extended as well to civilians involved in
22 the impoundment as well, as shown in an April 2, 2014, posting to a Facebook
23 page associated with a Bundy supporter:
24

1 EVERYONE PLEASE CALL

2 [redacted personal identifying information of civilian contractor]

3 They need to know what they are doing is NOT right and that we
4 notices (sic) it and we are a shamed (sic) of them!

5 I was taught to be honest in all my dealings! idk what they were
6 taught!

7 CALL THEM! AND PASS THIS ONE (sic)!!!

8 Exhibit 2, Example # 19.

9 The evidence shows that following this and similar posts, the contractor
10 was inundated with anonymous, threatening and intimidating telephone calls,
11 calling the contractor foul names, hanging up, and threatening death. Other
12 civilians associated with the impoundment suffered similar treatment. See
13 Exhibit. 2, Examples # 20 and 21.

14 The harassment and intimidation continued well after the impoundment
15 operation ceased due to the assault against law enforcement officers. The
16 government has already placed on the public record that on or around November
17 6, 2014, the Special Agent in Charge of the impoundment operation received a
18 voicemail message from defendant Peter Santilli. In the message, among other
19 things, Santilli and an associate of his stated:

20 Associate: [] Mr. Love, I was thirty feet away from you [referring to the
21 Bundy Ranch assault] . . . you work for a cartel . . . Remember Mr. Love,
22 **your family will also be destroyed** at the time when they no longer need
23 you to do the evil things you do. . . .

24 * * *

Santilli: If you don't turn in favor of the constitution and the people, **you**
are not going to live a happy life here on earth sir. You are

1 outnumbered. My listenership alone, o.k. will respond to Bundy Ranch if
2 you go anywhere near it. I need to tell you that. . . . We don't recognize the
3 BLM. We don't recognize your authority. We will have your guns taken
away. We will have you incarcerated. . . .

4 (emphasis added)

5 Nor were the bullying and harassment tactics limited to cyberspace or to
6 those connected with the assault of April 12, 2014. For example, since the
7 indictment of the common defendants charged in connection with the Malheur
8 Wildlife Refuge takeover (Ammon and Ryan Bundy, Ryan Payne, Peter Santilli,
9 Brian Cavalier, Joseph O'Shaughnessy, and Blaine Cooper), the judges associated
10 with that case have apparently received a number of threatening calls. As noted
11 by the District Judge in that case when overruling objections to a protective order
12 similar to the one sought here:

13 . . . the Court notes judges of the court affiliated with this case have been
14 inundated with communications from non-parties who have, in some cases,
15 conveyed harassing and threatening messages and, in any event, have
16 clearly attempted to influence these proceedings. Although the Court is
able to shield itself from such messages, the risk of exposing potential
witnesses to such contacts would create an undue risk of prejudice to the
ends of justice, the government, and at least some defendants.

17 *U.S. v. Ammon Bundy, et al.*, 16-cr-00051-BR (C.R. 446 at 4); *see also*, Exhibit 2,
18 Example # 15.

19 The government further notes that since the Superseding Indictment was
20 filed in this Court, counsel for the government – whose names and business
21 address are required to be placed on publically filed pleadings – have each
22 received through the mail, communications addressed to them at work that
23 contain language designed and intended to threaten and intimidate.
24

1 As the Court has already found, the discovery in this case is voluminous,
2 involving hundreds of hours of video recordings and many hundreds of
3 photographs, either obtained or recorded by law enforcement officers. Many of the
4 video recordings will contain images of witnesses, victim-law enforcement officers,
5 or law enforcement officers/agents involved in the investigation.

6 Further, the investigative reports associated with these recordings
7 (designated as Phase III of discovery production) will reveal the name(s) of the
8 investigating agent (s) and/or the names (or other identifying information) of
9 persons/witnesses/victims depicted in a photo or video. Other investigative
10 reports the government intends to produce in Phase III will likely contain
11 information related to witnesses or potential witnesses and victims.

12 As the District Court in Oregon noted, government counsel and the courts
13 have the means to shield themselves from attempts to threaten and intimidate.
14 But that is not necessarily so with victims and witnesses in this case, who are
15 vulnerable to cyberbullying, threatening communications, and intimidation
16 coming from anonymous supporters who pass images around in micro-seconds to
17 untold numbers of others, seeking information about victims and witnesses or
18 passing threatening communications to them. These tactics, previously employed
19 to great effect by Bundy supporters, have the potential to disrupt and prejudice
20 the truth-finding function of a trial by influencing potential witnesses or chilling
21 their willingness to testify.
22

23 The Advisory Committee notes to the 1974 amendments to Rule 16 state,
24 “Although the rule does not attempt to indicate when a protective order should be

1 entered, it is obvious that one would be appropriate where there is reason to
2 believe that a witness would be subject to physical or economic harm if his identity
3 is revealed.” *See also, e.g., United States v. Pelton*, 578 F.2d 701, 706-07 (8th Cir.
4 1978) (court properly issued a protective order preventing defendant’s access to
5 tape recordings in light of government’s concern for the safety of cooperating
6 sources whose identity was disclosed in the recordings); *United States v. Fuentes*,
7 988 F. Supp. 861, 866-67 (E.D. Pa. 1997) (permitting defense counsel to disclose
8 witnesses true identities only to the extent necessary to investigate the witness in
9 preparation for trial); *United States v. Zelaya*, 336 F. App’x 355, 357-58 (4th Cir.
10 2009) (upholding protective order permitting police officers from El Salvador to
11 testify under pseudonyms, without disclosure of their true names to the defense,
12 where government established genuine threat to the witnesses’ safety from the
13 MS-13 criminal gang and defense had sufficient information about the witnesses
14 to conduct an effective cross-examination). Here, to the extent history serves as
15 prologue, the threat that information about victims and witnesses will be released
16 into cyberspace and used to attempt to influence and harass is palpable.

18 The government intends to attempt to redact many of the investigative
19 documents to remove names of agents and witnesses but that still does not
20 address the potential nefarious use of images and social media postings, or the
21 fact that despite best efforts, errors in redaction will likely occur. Simply put,
22 discovery in this case is replete with third-party and witness information. As the
23 government has represented previously, hundreds of people, law enforcement and
24 non-law enforcement, participated in, or were witness to, the events giving rise to

1 the Superseding Indictment in this case. This includes numerous potential
2 subjects and witnesses who form a part of the government's ongoing investigation
3 in this case.¹

4 Given the incredibly voluminous nature of this case, these third-party
5 references cannot be entirely redacted, nor would doing so be beneficial to the
6 parties. As can be seen by the redactions found in the few sample postings at
7 Exhibit 2 (typical of discovery in this case), the time necessary to redact personal
8 identifying information from thousands of pages of Facebook postings alone would
9 be time-prohibitive, let alone redacting images from video or photographs.

10 The government and the defendants each have an interest in producing
11 discovery expeditiously. The protective order proposed herein will assist in
12 accommodating the timely production of discovery while balancing the need for
13 the government to protect victims and witnesses from harassment and
14 intimidation.

15 In his opposition, defendant Ammon Bundy suggests that the procedures
16 set out in the PPO should be reversed to require the government to make a
17 particularized showing as to each document/video/photograph for which it seeks
18 protection. But that is wholly impracticable given the volume of discovery in this
19 case. As the Court in Oregon noted when discussing the Protective Order entered
20 there:

21
22
23 ¹ Government counsel indicated it did not intend to add additional defendants to the
24 current indictment in the court's status conference of April 22, 2016. That representation
continues to be accurate and to accommodate the court and these defendant's needs to
manage the case as it goes forward. Nonetheless as the investigation develops further,
others may be charged separately.

1 [T]he Court notes the Bundys' proposed method of requiring the
2 government to make a specific showing of necessity as to each document
3 that it seeks to protect is wholly impractical. The Court is already requiring
4 the government to produce an extraordinarily large amount of discovery in
5 a relatively short period. Requiring the government also to make a specific
6 showing of necessity as to each document that it deems necessary to protect
7 would substantially slow the rate at which the government could process
8 and produce discovery [....]

9 *U.S. v. Ammon Bundy, et al.*, 16-cr-00051-BR (C.R. 446 at 5).

10 Santilli claims that any document filed with motions will need to be filed
11 under seal. That is not so, nor is it provided for in the protective order. If there is a
12 genuine litigation need to attach pages of discovery to a motion or other filing,
13 nothing in the protective order precludes doing so. Certainly defense counsel can
14 exercise their discretion not to unnecessarily expose third parties and their
15 personal information to public scrutiny where there is no need to do so.² The
16 order also gives the defense broad latitude to communicate discovery information
17 with whomever they deem is necessary to prepare an effective defense, without
18 any specific limitation.

19 It is, therefore, requested that this Court order that the discovery material
20 provided in this case may be disseminated only to the following individuals:

21 (1) The defendants in this case;

22 (2) Persons employed by the attorney of record who are necessary to assist
23 counsel of record in preparation for trial or other proceedings in this case; and
24

² As a general matter, discovery only becomes public when it is filed in connection with a case. See *Bond v. Utreras*, 585 F.3d 1061, 1077 (7th Cir. 2009) discussing *San Jose Mercury News, Inc. v. District Court*, 187 F.3d 1096 (9th Cir. 1999); see also *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 33 (1984) (“[R]estraints placed on discovered, but not yet admitted, information are not a restriction on a traditionally public source of information.”).

1 (3) Persons who defense counsel deems necessary to further legitimate
2 investigation and preparation of this case.

3 The government also requests that this Court order defense counsel to
4 provide a copy of the protective order to any person above who receives copies of
5 the discovery.

6 The government further requests that the protective order allow any person
7 above who receives copies of discovery from defense counsel to use said discovery
8 only to assist the defense in the investigation and preparation of this case, and
9 shall not allow them to reproduce or disseminate the discovery material to any
10 other person or entity.

11 The protective order shall apply only to materials and documents created or
12 written by the government, or obtained by the government in the course of its
13 investigation or through warrants and court orders. It shall not restrict
14 reproduction or dissemination of discovery materials the defendants obtained in
15 the course of their investigations through open sources.³

16 The government submits that these narrow restrictions appropriately
17 balance the need for the expeditious production of discovery against the need for
18 witness security and protection, while ensuring the case is tried in the courts and
19 not on social media. The sole object and purpose of this protective order is to
20

21
22
23 ³ The language in this paragraph varies slightly from that circulated the government's
24 initial draft of the Proposed Protective Order, adding the words "in the course of its
investigation" in the first sentence and the words "in the course of their investigations" in
the second sentence.

1 ensure that the discovery materials are used as they should be, in the preparation
2 of a defense case, and not for any other improper purpose.

3 **WHEREFORE**, for all the foregoing reasons, the government respectfully
4 requests that the Court grant its Motion and enter a Protective Order
5 substantially in the form found at Exhibit 1.

6 **DATED** this 3rd day of May, 2016.

7
8 Respectfully,

9 DANIEL G. BOGDEN
10 United States Attorney

11 //s//
12 STEVEN W. MYHRE
13 NICHOLAS D. DICKINSON
14 Assistant United States Attorneys
15 NADIA J. AHMED
16 ERIN M. CREEGAN
17 Special Assistant United States Attorneys

18
19 Attorneys for the United States
20
21
22
23
24

CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office. A copy of the foregoing **Government's Motion for Protective Order and Supporting Memorandum** was served upon counsel of record, via Electronic Case Filing (ECF).

Dated this 3rd day of May, 2016.

/s/ Mamie A. Ott
MAMIE A. OTT
Legal Assistant

Exhibit 1

DANIEL G. BOGDEN
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**UNITED STATES DISTRICT COURT
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CLIVEN D. BUNDY,
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MICAH L. McGUIRE, and
JASON D. WOODS,

Defendants.

2:16-CR-00046-GMN-PAL

PROPOSED PROTECTIVE ORDER

1 Upon motion of the United States for a Protective Order, the Court being
2 advised as to the nature of this case, the premises of the motion therein
3 considered and good cause being shown, it is hereby **ORDERED** that, pursuant to
4 Rule 16(d)(1) of the Federal Rules of Criminal Procedure, defense counsel may
5 provide copies of discovery and disseminate information produced by the
6 government in discovery only to the following individuals:

7 (1) The defendants in this case;

8 (2) Persons employed by the attorney of record who are necessary to assist
9 counsel of record in preparation for trial or other proceedings in this case;
10 and

11 (3) Persons who defense counsel deem necessary to further their legitimate
12 investigation and preparation of this case.

13 IT IS FURTHER ORDERED that defense counsel shall provide a copy of
14 this Protective Order to any person above who receives copies of discovery
15 materials and information.

16 IT IS FURTHER ORDERED that any person above who receives copies of
17 discovery materials and information from defense counsel shall use the discovery
18 only to assist the defense in the investigation and preparation of this case, and
19 shall not reproduce or disseminate the discovery material or information to any
20 other person or entity.

21 IT IS FURTHER ORDERED that this Protective Order applies only to
22 materials, information and documents created or written by the government,
23 obtained by the government in the course of its investigation and/or through
24

1 warrants and court orders. This Protective Order does not restrict reproduction or
2 dissemination of materials and information the defendants obtained in the course
3 of their investigations through open sources, such as news accounts related to the
4 events in this case.

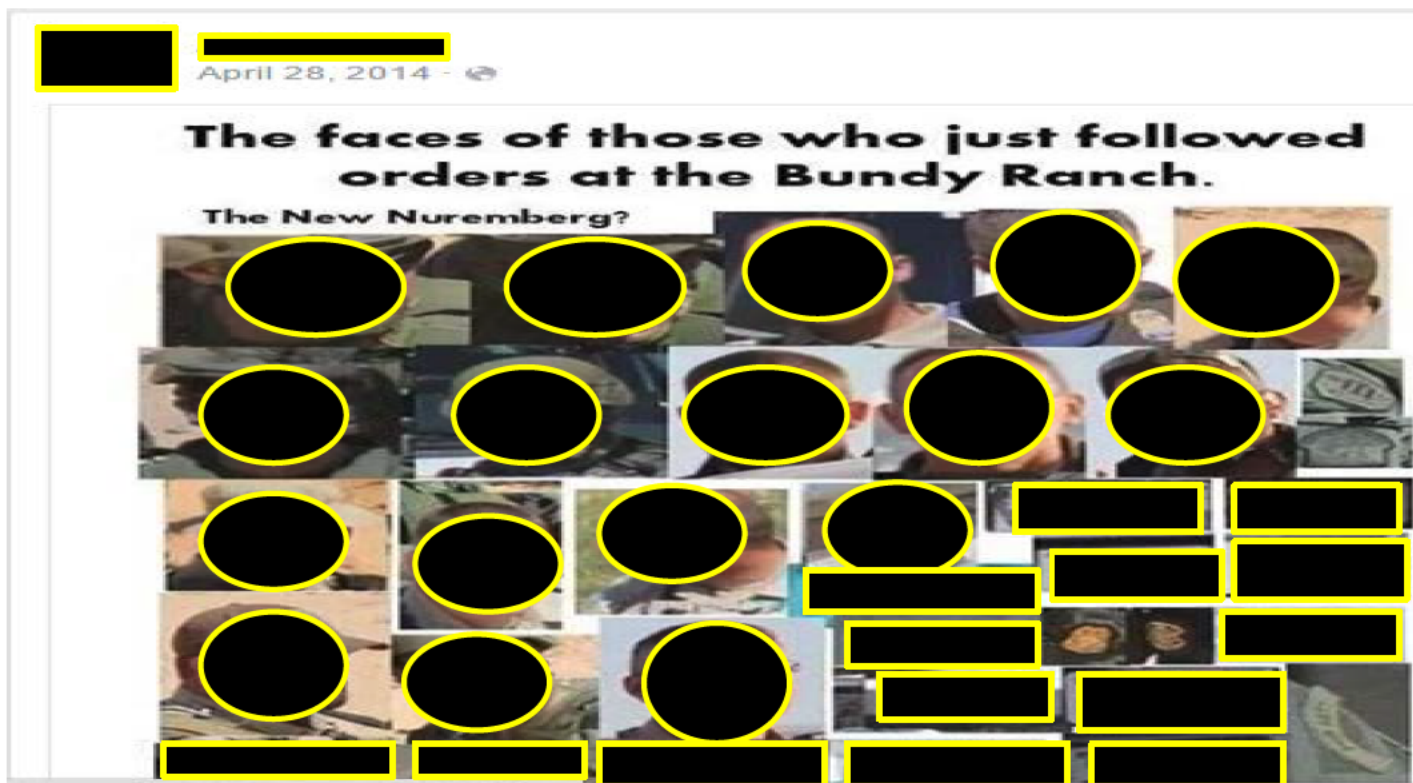
5 IT IS FURTHER ORDERED that if there is specific discovery material or
6 information that defense counsel believes should be an exception to this Protective
7 Order, the parties shall confer before seeking guidance from this Court. The
8 parties shall advise the Court by letter of any exceptions made to the Protective
9 Order.

10 IT IS SO ORDERED, this ____ day of May, 2016.

11
12
13 _____
PEGGY A. LEEN
14 UNITED STATES MAGISTRATE JUDGE
15
16
17
18
19
20
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22
23
24

Exhibit 2

- 1) Facebook public posting, dated 4/28/2014. Photo was shared and reposted extensively from April through the remainder of 2014, repeatedly highlighting the various names and faces and suggesting others try to identify and contact those in the photo.



[Redacted] Good job, it is always good to know the names, and addresses for future communication and contact to send christmas cards or such to them and their families 😊 if and when appropriate .

April 28, 2014 at 11:17am · Like · 8

[Redacted] I like your thinking Joe.

April 28, 2014 at 11:21am · Like · 4

[Redacted] In texas if there were any texas tags we can run a twix....its a registration search and you get a copy of the registration with address,make,model,color,and names of who the vehicle is registered to.....anyone living in the states on those tags may be able to do the same.

April 28, 2014 at 11:26am · Like · 3

- [REDACTED] Where's the nanny goat that was on TV the day they were backed down?
April 28, 2014 at 12:20pm - Like - 1
- [REDACTED] There's one missing. The coward with the long beard. Need his adress to.
April 28, 2014 at 12:29pm - Like - 3
- [REDACTED] think thats the nanny goat in middle of second row hiding her beard
April 28, 2014 at 12:29pm - Like - 2
- [REDACTED] That is all they are hired thugs!
April 28, 2014 at 2:45pm - Like - 2
- [REDACTED] And, now we can be looking for them~!
April 28, 2014 at 4:29pm - Like - 2

2) Facebook public posting, dated 4/12/16

[REDACTED] April 12, 2014 - 8 [Follow](#)

URGENT... SHARE: CLICK ON THE PICTURE TO SEE SHARE BUTTON!
WE MUST IDENTIFY THESE CONTRACT MERCENARIES..... WHEN WE DO WE WILL BE ONE STEP CLOSER TO A STRATEGY THAT WILL REDUCE THE NUMBER OF THESE PEOPLE WHO WILL SHOW UP TO ATTACK AMERICAN CITIZENS!
The Bundy Ranch Action is not Over.. HELP US TO IDENTIFY THESE MEN IN THE PICTURE.
(THE VIDEO LINK WILL HELP YOU GET A GOOD LOOK AT THEM!)
They should not go Unpunished!
FYI:
Dave Bundy, was allegedly arrested for taking photos of state road 170, which had been closed by BLM. Dave was aggressively apprehended by officials for "failure to comply requests by BLM law enforcement to leave the temporary closure area on public lands."
Carol Bundy said five agents took Dave and "threw him on the ground."
"One put his knee on his head, the other put his boot on his head and pushed him into the gravel," she said. "He's got quite a bruised head. Just bruised him up pretty good."
A National Park Service spokesperson confirmed "security persons" were present to keep contractors safe !!
HELP IDENTIFY THEM.
IF YOU KNOW WHO THEY ARE LET US KNOW!!
SHARE AND EXPOSE THESE JACKBOOTED THUGS.
WANT TO SEE THE VIDEO OF WHAT THEY DID ???

WANT TO SEE THE VIDEO OF WHAT THEY DID ???
CLICK HERE !! Take a good look at them and tell us if you know them!!
<http://youtu.be/LhJ6H9vIEDA>



Per Facebook annotations, this post was shared over 1400 times and generated 75 comments. Comments of concern noted below:



[REDACTED] The jerk that man handled the lady is [REDACTED]
Portland, Oregon BLM

April 12, 2014 at 11:55am · Like · 👍 7

[REDACTED] A slow coup d'etat, is what I see. But failing.

April 12, 2014 at 11:57am · Like · 👍 1



April 12, 2014 at 11:57am · Like · 👍 9

[REDACTED] [REDACTED] email him and tell him he is
wrong for hurting that lady !!! 😞

April 12, 2014 at 1:24pm · Like · 👍 3

3) **Twitter post dated April 2014**

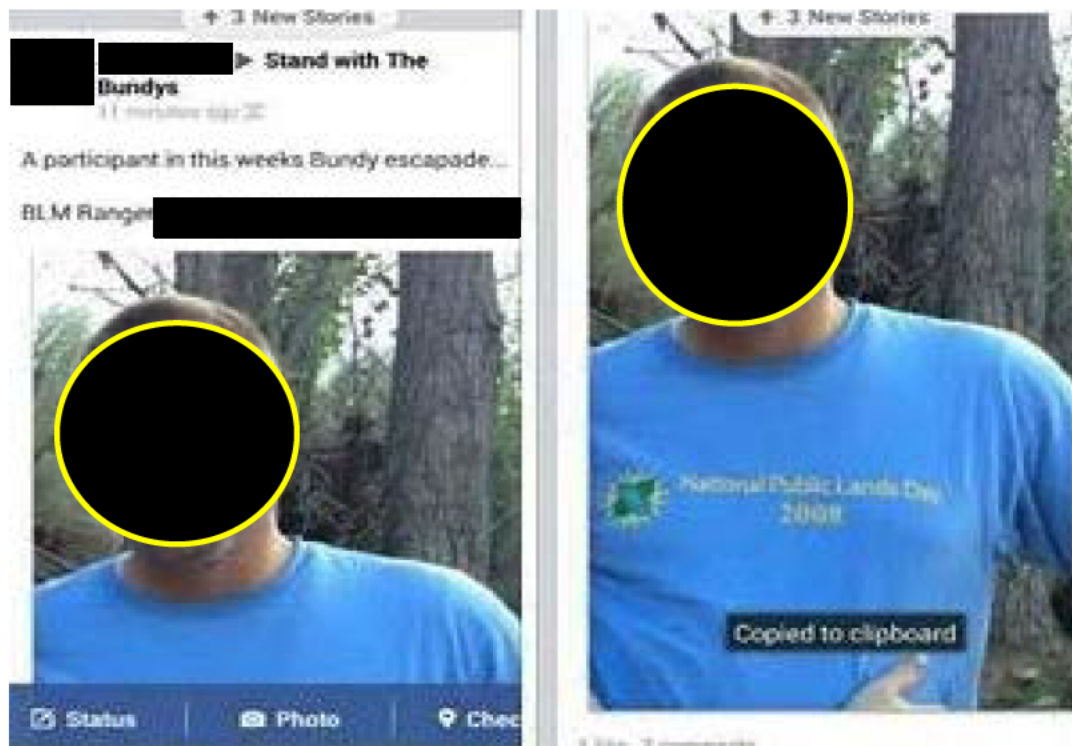


4) **Discussion on godlikeproduction.com forum dated 4/7/2014**

Anonymous Coward User ID: [REDACTED] United States 04/07/2014 09:02 AM Report Abusive Post Report Copyright Violation	Re: Feds trying to kill rancher & steal his ranch because his cow is on federal turtle land - Rancher takes a STAND, come kill me!!! Armed Rangers. Armed agents. How would they like it if someone isolated them and did that to their families?	
--	---	--

Anonymous Coward User ID: [REDACTED] United States 04/07/2014 09:17 AM Report Abusive Post Report Copyright Violation	Re: Feds trying to kill rancher & steal his ranch because his cow is on federal turtle land - Rancher takes a STAND, come kill me!!! Armed Rangers. Armed agents. How would they like it if someone isolated them and did that to their families? Quoting: [REDACTED] We should run an experiment and see.	
--	--	--

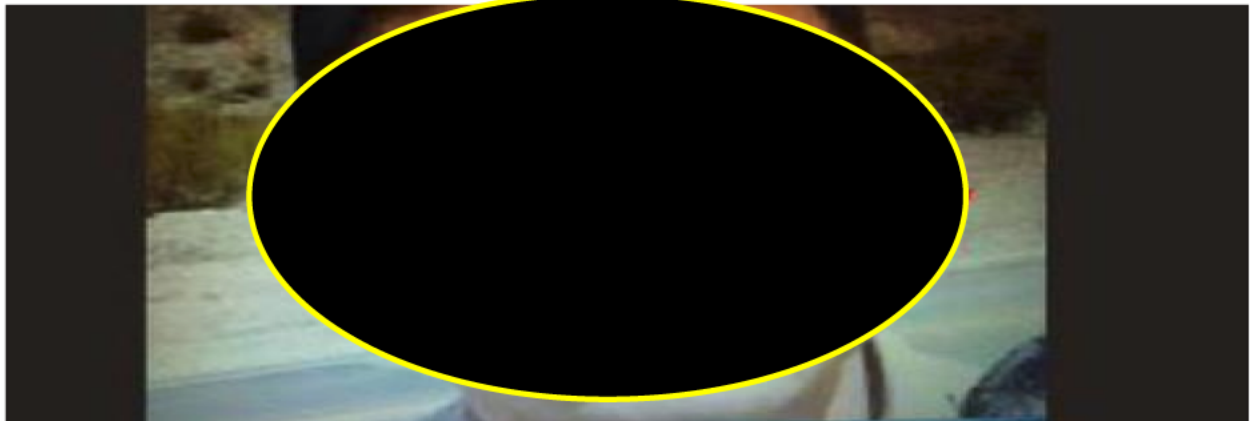
5) BLM Ranger [REDACTED] photo, home number and city of residence exposed by a public post on Facebook dated 4/13/2014





6) BLM State Chief Ranger [REDACTED] -- Photo originally appeared publicly on Facebook on 4/9/14, and went viral within the Bundy support community. The number of comments, shares, reposts and redesigns of this photo were extensive. Below are a few examples of the postings generated from the photo:

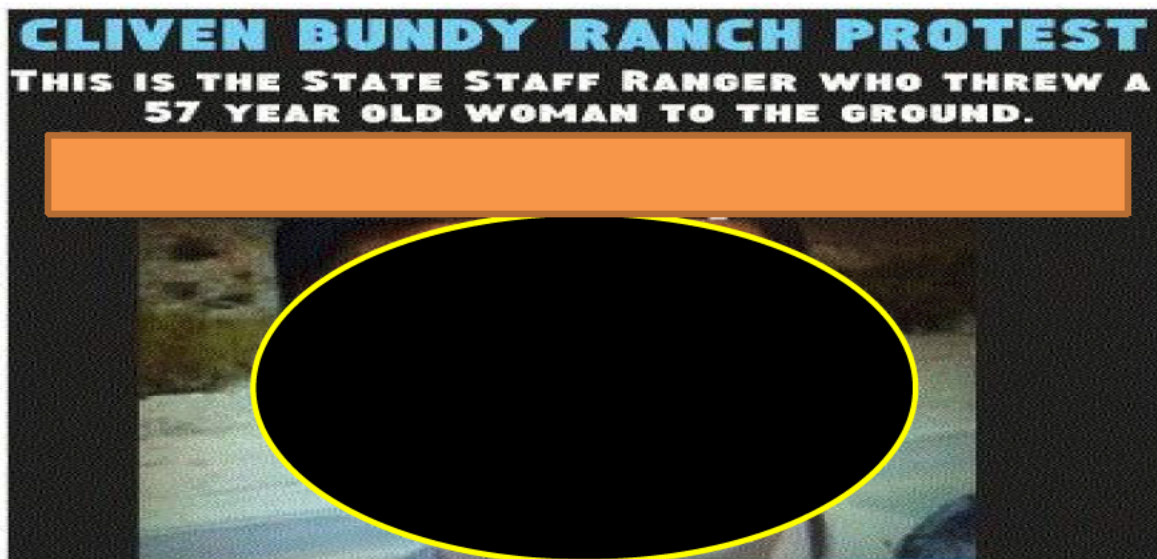




by: Pipeman This is being done by some one that Sheriff Mack says has no law enforcement authority in Clark County. This needs to go to everyone you know so t...

TEAPARTYORG.NING.COM

- 7) **RipOff Report website dated 4/15/2014. Post includes photo initially seen on Facebook.**



8) Posted on Twitter on 4/11/2016



9) Website blog dated 4/14/2014 discloses [redacted] professional contact information and discusses him at length in light of the Bundy events.



State Staff Ranger [redacted] BLM
Oregon State Office [redacted]
Portland, Oregon, [redacted]
or [redacted]

10) Coyote-TV website -- Dated 4/18/2016

Named & Shamed BLM Rangers Beat Retreat From Ranch

Posted on 18 April 2014 by [REDACTED]

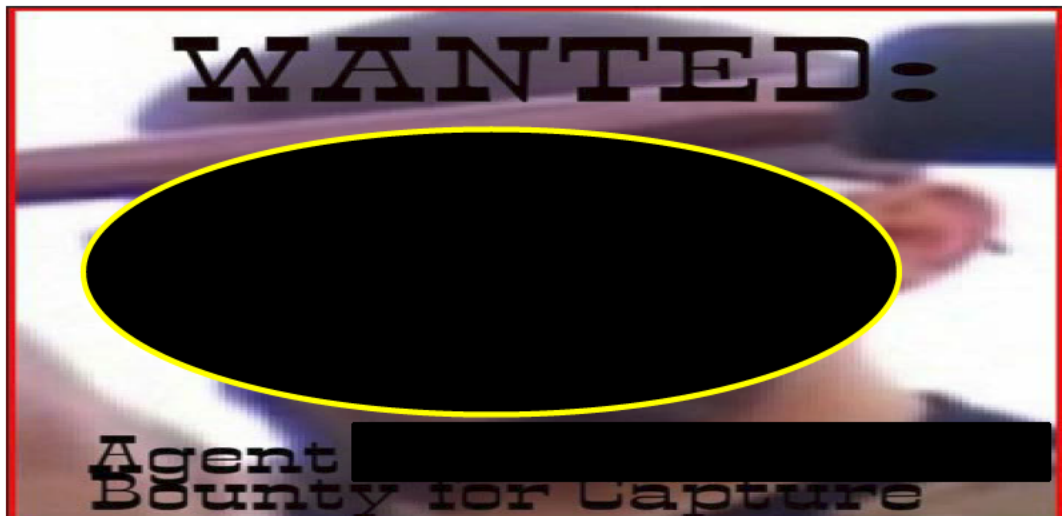
This is [REDACTED] He works for the BLM out of Portland, Oregon! He is the one who threw 57 year old Margaret Houston to the ground! She had her back to him and never knew it was coming! Share his photo and info to all you know! This man needs to lose his job!



Like - Comment - Share

i)

11) Facebook public post – Dated 12/2/2014



12) Facebook public post – Dated 10/17/2014 by user name [REDACTED] via the Bundy Ranch Facebook page

[REDACTED] via Bundy Ranch
October 17, 2014 · 🌐

Wow! [REDACTED] was the Agent in Charge at Bundy Ranch! Arm yourselves! This is why Militia showed up to the Bundy.

👍 6 5 Comments 2 Shares

👍 Like 💬 Comment ➦ Share


[REDACTED] That mall ninja with Oakley SI gloves...LOL
October 17, 2014 at 6:57pm · Like

[REDACTED] Their was something defiently shady about him and heres the proof
October 17, 2014 at 7:46pm · Like

[REDACTED] When a group a people feel as they 're immune for their sctions, this is what you get, a watered down version of communism.... Been there done that!
October 18, 2014 at 12:49am · Like · 👍 1


[REDACTED] I really wish someone from that bridge would have removed that asshole from the equation before he did more damage. Total and complete tyrant!!
October 18, 2014 at 9:35am · Like

13) Article posted on InfoWars on 3/5/2016 titled “Unconstitutional BLM Actions Heating Up. Comments noted below:

 [REDACTED] 2 months ago

Sounds like to solve the problem a lqnd owner will,have to take out an AR 10 and put a bullet in [REDACTED] head to save the other land owners to stop this, if I had land. i will now,kniw who to shoot first. Theft is theft so yes legally youmcan now shoor [REDACTED]

^ | v · Reply · Share ›

 [REDACTED] - 2 months ago

The BLM, EPA, FDA are just arms of the UN to take DOWN Amerkia!

[REDACTED] should be on a list for the moose hunters.

^ | v · Reply · Share ›

 [REDACTED] - 2 months ago

[REDACTED] needs to be the first targeted.

^ | v · Reply · Share ›

14) Facebook public post -- Date 2/23/2016. Note comment below the main post regarding located Dan Love's home, photos, and info on his location.

2 hrs · 🌐

is a jerk. and I was told he is on the edge of being fired. What fired to cover up .



lavoy 8 14 15 BLM

LaVoy vs. BLM part 1, 8-14-15 Visit our site www.onecowboystandforfreedom.com To use this video for any purpose you must contact LaVoy Finicum's wife, Jeanet...

YOUTUBE.COM

Like

Comment

Share

and 2 others like this.

3 shares

has been involved in several FBI murders of the years..He seems to think his is a hired gun and doing his job to kill.

Like · Reply · 2 hrs

Right . I have been waiting on a guy for over 14 years now. He use to work for blm, and he has have me some inside news. He was the one that told me few days ago they are gonna do call fire To make it look good . the blm will never look good in my eyes.

Like · Reply · 1 · 2 hrs

is there any photos, info of location or home 20 for this Thanks

Like · Reply · 1 hr

15) Facebook public post – Date 2/18/2016



16) Facebook public post with corresponding comments, dated 4/28/2014

[Redacted] [Redacted]
April 28, 2014 · 🌐

Here is the name of the company (so called Cowboys) that where hired my blm to round up the Bundy cattle. [Redacted] out of Utah.. and one of the blm agents that followed me to the LAS airport to question me here's his Name [Redacted] He said he would do a off camera interview last week to speak out against the very agencie he is employed by. . Guess he pussued out so here's his name:) I will wait to post a pic of his badge!

👍 Like 💬 Comment ➦ Share

[Redacted] Damn no face pic ?
April 28, 2014 at 5:33pm · Like · 👍 1

[Redacted] Sorry
April 28, 2014 at 5:44pm · Like · 👍 1

[Redacted] No big deal. Can't get everything, who knows one might turn up!
April 28, 2014 at 5:48pm · Like

[Redacted] The net says [Redacted] made a deal w BLM for \$966,000.00, so if you feel the urge you can call him [Redacted] 😊
April 28, 2014 at 5:50pm · Like · 👍 3

[Redacted] Mormons [Redacted]
April 28, 2014 at 9:42pm · Like

[Redacted] Yes
April 28, 2014 at 9:49pm · Like · 👍 1

[Redacted] I am sharing the heck out of this.
April 28, 2014 at 9:50pm · Like · 👍 1

17) Facebook public post – Dated 4/12/2014

[Redacted] ▶ Bundy Ranch
April 12, 2014 · 🌐

The contract cowboys that the BLM hired to do the roundup are from [Redacted] in Meadow, Utah

👍 Like 💬 Comment ➦ Share

18) Facebook public post, dated 4/5/2014



April 5, 2014 · 🌐

With the help the federal officials that are supposed that YOU pay to protect us and are property!
The cattle thieves have officially stolen three truck loads of cattle!!!
SOS

Like · Comment · Share



April 5, 2014 · 🌐

changed her profile picture.





Unlike · Comment · Share

👍 You, [redacted] and 6 others like this.

➦ 2 shares



April 5, 2014 at 7:31pm · Like

[redacted] Lol 3 phone calls & messages still won't answer a real coward!!!!

April 5, 2014 at 7:53pm · Like · 👍 4



April 5, 2014 at 7:53pm · Like · 👍 4

I'd just like to ask, why? Why would you do this? Do you realize what you're doing? If you really don't, then let me tell you? You're crucifying an honest, hard working, family man. You couldn't do this if you knew him. You just wouldn't. How could you help a corrupt government? Is it worth your soul?

added 8 new photos.

April 5, 2014 · Edited ·

With the help of the the state officials that are paid to protect or life, liberty and property
the Feds and Cattle Thieves have officially stolen six total truck loads of cattle!
(that we know of)
THEY HAVE OFFICIALLY STOLEN CATTLE!



Like · Comment · Share

and 4 others like this.

62 shares

19) Facebook public post – Dated 4/2/2014

April 2, 2014 · 🌐

EVERYONE PLEASE CALL

They need to know that what they are doing is NOT right and that we notices it and we are a shamed of them!
I was taught to be honest in all my dealings! idk what they were taught!
CALL THEM! AND PASS THIS ONE!!!

Share

👍 11 people like this.

➦ 19 shares

I just called the so called R Livestock told them a piece of my mined & got hung up on 5 times LOL WHAT A JOKE THEY ARE!!
April 2, 2014 at 11:44am

i did to!
April 2, 2014 at 11:45am

It went straight to the machine for me...but I did leave a message.
April 2, 2014 at 12:02pm

Thank you
April 2, 2014 at 12:05pm

I think you are right!
April 2, 2014 at 12:53pm

Good idea! Can you zoom and and get a few names and numbers for me!
April 2, 2014 at 1:55pm

Thank you!!!
April 2, 2014 at 2:12pm

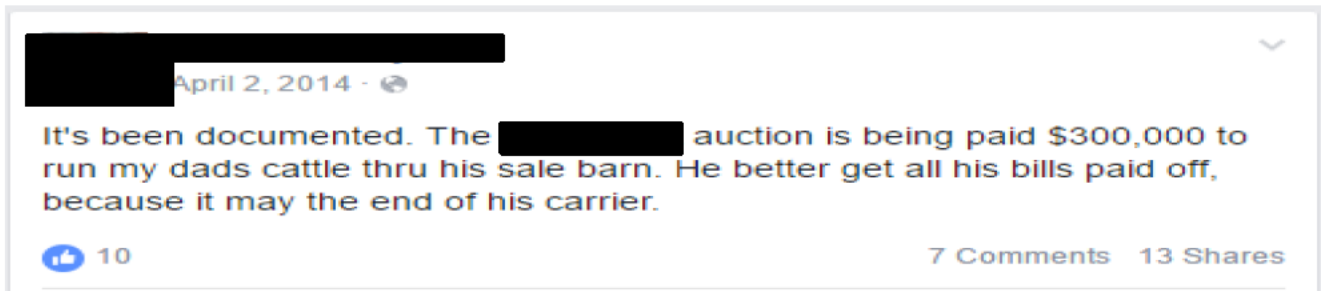
Great idea- I called and left a lengthy message talking about civic responsibility.
April 2, 2014 at 2:32pm

Is this the auction house?
April 2, 2014 at 7:13pm · 👍 1

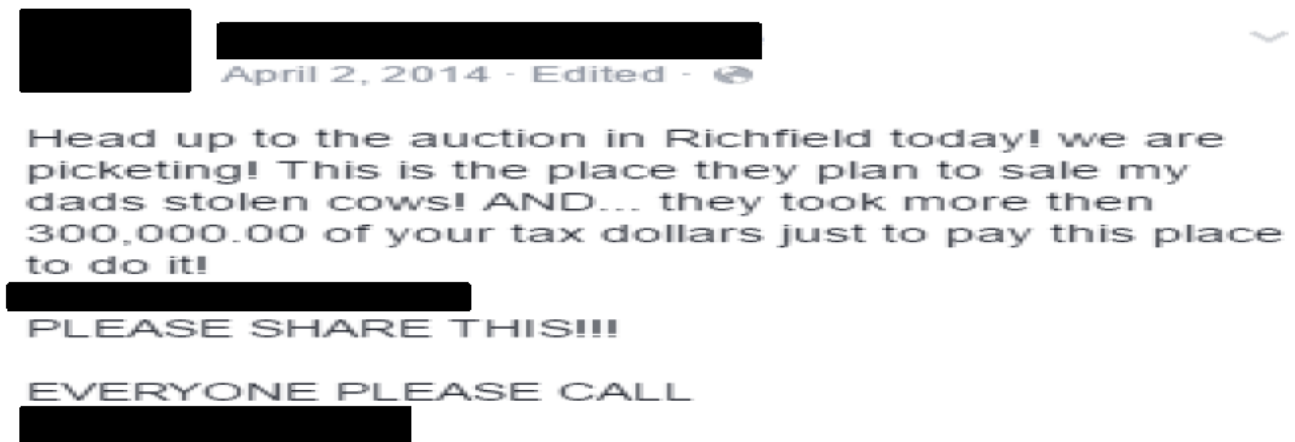
Here are a few more numbers that people need to call. County Sheriff 702-671-5822, Governor's Office 702-486-2500 County Commissioner 702-455-3500

ii)


20) Facebook public post – Dated 4/2/2014



21) Facebook public post – Dated 4/2/2014



22) Facebook public post – Dated 4/11/2014 via “We Support Cliven Bundy” page

**We Support Cliven Bundy**
April 11, 2014 · 🌐

ATTENTION: I just got some information in.
The Cattle are going to be transported to the [REDACTED] in California.
Scheduled for Monday, could be sooner than that. They are going to be
auctioned Wednesday.

Folks, I ask that you spread this to the four corners of the internet! If you are
in California, you will be of great asset on this one.

[REDACTED] Information is as follows:
[REDACTED]

#RangeWar #Cattlethieves #Criminals #BundyRanch #BLM

Unlike · Comment · Share