



U.S. Department of Justice

Billy J. Williams

United States Attorney

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January 4, 2017

Mr. Gary Hunt
25370 2nd Avenue
Los Molinos, CA 96055-9671

Re: *United States v. Ammon Bundy, et al.*, 3:16-CR-00051-BR
Demand to Cease and Desist Public Dissemination of Protected Material

Dear Mr. Hunt:

Excerpts of material produced in discovery under a Court Protective Order in the above subject case, *United States v. Ammon Bundy, et al.*, 3:16-CR-00051-BR, have been viewed on your website (<http://outpost-of-freedom.com>). Your possession of that material and any dissemination and publication of any excerpts of that material violates the terms of the Court's Protective Order (copy enclosed).

Consequently, you must **immediately cease and desist** publicly disseminating that material. You must also return all copies of that material to the United States and remove all protected material from the referenced website or any other website. To make arrangements to immediately return all material, electronic or otherwise, that is illegally in your possession, please contact the Federal Bureau of Investigation at (916) 746-7000 and ask to be directed to the Chico Resident Agency. Failure to immediately comply with this demand within **twenty-four hours** will necessitate that the United States seek a court order compelling your compliance.

Sincerely,

BILLY J. WILLIAMS

United States Attorney


PAMALA R. HOLINGER

Chief, Criminal Division

Enclosure

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

AMMON BUNDY, et al.,

PROTECTIVE ORDER

Defendants.

Upon motion of the United States, the Court being advised as to the nature of this case, and good cause being shown, it is hereby

ORDERED that, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, defense counsel may provide copies of discovery only to the following individuals:

- (1) The defendants in this case;
- (2) Persons employed by the attorney of record who are necessary to assist counsel of record in preparation for trial or other proceedings in this case; and
- (3) Persons who defense counsel deems necessary to further legitimate investigation and preparation of this case.

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

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

IT IS FURTHER ORDERED that this Protective Order applies only to:

- (1) Statements by witnesses and defendants to government officials;
- (2) Sealed documents; and
- (3) Evidence received from searches of electronic media.

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

IT IS FURTHER ORDERED that any materials subject to this Protective Order may be filed by a party under seal without prior approval of the Court.

The parties shall continue to confer regarding the efficacy of this Protective Order. Any outstanding issues between the parties related to this Protective Order shall be addressed by the Court at the status conference on June 15, 2016.

Dated this 24th day of March 2016.

s/ Anna J. Brown
THE HONORABLE ANNA J. BROWN
United States District Judge

Presented by:

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon

s/ Craig J. Gabriel
ETHAN D. KNIGHT, OSB #99298
GEOFFREY A. BARROW
CRAIG J. GABRIEL, OSB #01257
Assistant United States Attorneys