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5 Attorney for Plaintiff LAURA LEIGH

6 **IN THE UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 LAURA LEIGH,

9 Plaintiff,

Case No. 3:10-cv-00417-LRH-VPC

10 vs.

11 KEN SALAZAR, in his official capacity as  
12 Secretary of the U.S. DEPARTMENT OF  
THE INTERIOR, BOB ABBEY, in his official  
13 capacity as Director of the BUREAU OF  
LAND MANAGEMENT; RON WENKER in his  
14 official capacity as Nevada State Director of  
the BUREAU OF LAND MANAGEMENT, *et*  
15 *al.*,

16 Defendants.  
17 \_\_\_\_\_/

18 **DECLARATION OF DENIZ BOLBOL**

19 I, DENIZ BOLBOL do hereby swear, under penalty of perjury under the laws of  
20 the State of Nevada and of the United States of America, that the foregoing is true and  
21 correct:

22 1. I am personally familiar with the facts set forth herein except for those  
23 facts stated on information and belief and as to those facts I believe them to be true.

24 2. On the 16<sup>th</sup> of July 2010 I drove to Reno and then traveled with Laura  
25 Leigh and another woman from Reno to view the Owyhee HMA wild horse roundup.  
26 We were never allowed to see any portion of the roundup at Owyhee HMA.

27 **EXHIBIT B**  
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1           3.       On July 17, 2010 while attempting to locate the Owyhee HMA horse trap  
2 site, there was a point, while I was driving, where we (myself and the two women) came  
3 to a spot blocked by official BLM vehicles which were parked in the road, creating a  
4 road block. These vehicles prevented us from continuing on the road. I am informed  
5 and believe the BLM officials called an Elko County Sheriff's Deputy who arrived at that  
6 location. I recorded video of our conversations and am happy to make them available  
7 to the court.

8           4.       While stopped at the BLM vehicle road block, Deputy Sheriff Ames  
9 arrived. Deputy Ames advised I was at the "edge of private property" whereupon I  
10 backed the car up to make certain I was not trespassing. I did so because we had  
11 been threatened with arrest earlier should we set foot on private land. Deputy Ames  
12 also told me, "You can't trespass on somebody else's property."

13           5.       While there, BLM Ranger Vanderpool who was also present, showed us  
14 his mapping GPS (global positioning unit). He pointed to our location on his GPS  
15 stating, we were on public property but that private property started approximately "500  
16 yards" ahead. There were no posts or signs indicating when or where private property  
17 started or when it ended. Even Deputy Ames agreed the property line was invisible  
18 since it was not marked.

19           6.       I was later advised and now am informed and believe when we were met  
20 by the blockade of BLM vehicles, that we were on a public road and on public lands;  
21 that the public road continued on and that the private lands boundary was within a mile  
22 of our location. Based on the foregoing, I am informed and believe BLM officials  
23 stopped us from proceeding further on a public roadway while on public lands; and that  
24 the roadway continued on as public and remained on public lands until well after the  
25 point (in our direction of travel) where we were met by the blockade of BLM vehicles.

26           7.       The BLM created a very stressful situation for us. Rather than working  
27 with us to provide observation opportunities they created obstacles and played an  
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1 intimidating cat and mouse game with the location of "private property"

2 THIS DECLARATION under penalty of perjury under the laws of the State of  
3 Nevada and of the United States is made this 10<sup>th</sup> day of August in California.

4 /S/

5 Deniz Bolbol, Declarant

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