

## DECLARATION OF LAURA LEIGH

I LAURA LEIGH, declare under penalty of perjury, the following:

1. I am the Plaintiff in the above-captioned matter. I am personally familiar with the facts set forth herein except for those facts stated on information and belief and as to those facts, I believe them to be true. I submit this Declaration in support of the Plaintiff's Amended Motion for Temporary Restraining Order and Amended Motion for Preliminary Injunction.
- 2 I Arrived at 5:45 a.m. October 3, 2010 at a designated meeting area to observe the Silver King roundup near Pioche, Nevada. Mr. Chris Hanefeld, whom I am informed and believe is employed with the Bureau of Land Management ("BLM") as a public relations person, drove up and joined us moments later. Mr. Hanefeld conveyed that the "observation area" had not yet been chosen for the trap site that was set Friday, October 1.
3. Apparently after observation areas were determined, we were then given two choices to view the trap area. We chose what appeared to be the best area, area "A."
4. From this designated observation area the wild horse trap was not visible to the naked eye. Details of the trap were not discernable with a twenty power (20X) zoom lens. From this vantage point, no contractor handling at the trap could be observed. From this vantage point no loading of horses could be observed.
5. Because the designated observation area did not provide any opportunity to visualize or assess the captured horses' health and welfare and because we could not see the BLM's contractor handle the horses, we chose to leave the designated observation area to try to actually see horses elsewhere, where allowed.
6. As we left the designated observation area we were able to see a ramp the BLM contractor would use to load captured horses to a stock trailer stock (semi) along with a paddle to "urge" horses forward.
7. We went to the area the BLM used to temporarily hold horses ("holding area"). While there we were able to see from a distance, three stallions and mares, one with a significant facial injury, left in a tight alleyway. Because of paneling, we were able to see only the horses' feet and some of their heads but nothing else. These horses were crowded in tight quarters and were frequently fighting. I am informed and believe these horses remained there approximately five hours while no attempt was made by the BLM to sort, to treat, or otherwise water and feed the captured wild horses. We were advised by BLM officials this was so because there were not enough personnel there to help sort and process these captured wild horses. Later on however, we observed the same persons, there previously, finally sort these horses.
8. My companion and I accompanied BLM personnel to see the next trap site to be erected for the next day's gather. We also observed the BLM discuss and designate observation areas for this new trap location. I am informed and believe, based on these observations and also on hearing discussions, it is the custom and practice of the BLM to determine observation areas at the same time traps are set.

9. I was informed that the last shipment of horses from Silver King this past week, included mares and studs that were transported to Indian Lakes, also known as Broken Arrow in Fallon, Nevada. The BLM webpage lists none of these horses being transported to the Gunnison State prison in Utah. I had been informed on a previous occasion by Debra Collins a BLM public relations person, that the only place to find the most accurate information about ongoing BLM wild horse gathers was by visiting the BLM webpage.

10. Based on the foregoing information in the previous paragraph, I am informed and believe the shipment of the horse I expressly asked remain in Nevada because I would find him a home, was shipped to Gunnison, Utah, is retaliatory for my manner of reporting BLM management pertaining to their capture and handling of wild horses.

11. Again, I arrived this morning (October 4, 2010) to view the Silver King wild horse roundup. Once again, we were assigned an observation location where the trap was barely visible to the naked eye and that no BLM contractor handling activity was visible. There is no meaningful visual observation from these assigned areas.

12. Attached with this Declaration (Exhibit 13) are photographs taken by me personally. These photos accurately depict that which is seen, without enhancement or distortion, of Silver King observation and related areas. These photos relate to the discussion herein. The captions therein also accurately convey what is depicted.

THIS DECLARATION is made this 4<sup>th</sup> day of October 2010 in Lincoln County, Nevada.

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Laura Leigh, Declarant