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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

MICHAEL E. SPREADBURY,

Plaintiff,

v.

BITTERROOT PUBLIC LIBRARY,
CITY OF HAMILTON, LEE
ENTERPRISES, INC., and BOONE
KARLBERG P.C.,

Defendants.

Cause No. CV-11-064-M-DWM

DEFENDANT LEE ENTERPRISES,
INC.'S STATEMENT OF
UNDISPUTED FACTS IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT

Pursuant to Local Rule 56.1(a), Defendant, Lee Enterprises, Inc. ("Lee Enterprises"), submits the following Statement of Undisputed Facts in Support of its Motion for Summary Judgment.

1. On August 9, 2010, the *Ravalli Republic* published an article reporting

on two separate public hearings in the Ravalli District Court in which Plaintiff, Michael Spreadbury (“Spreadbury”), appeared. The August 9, 2010 article mistakenly noted Spreadbury was previously charged and convicted of disturbing the peace, when, in fact, he had previously been charged with criminal trespass. Dkt. 124-11.

2. The article in the *Ravalli Republic* was not a routine report of the daily Court Docket. The hearings were covered because Spreadbury was newsworthy. He had created and interjected himself into the center of a number public controversies. Those controversies began long before the August 6, 2010 hearings. They included but were not limited to: (1) a 2006 effort to have a neighbor declared a public nuisance; (2) efforts to remove Ravalli County Attorney George Corn (“Corn”); (3) efforts to remove Ravalli County Sheriff Chris Hoffman (“Hoffman”); (4) complaints against the Hamilton Police Department; (5) allegations of corruption by local government; (6) complaints about the Rocky Mountain Lab; (7) disputes with the Bitterroot Public Library; (8) allegations of misconduct by Hamilton City Attorney; (9) multiple lawsuits filed against public servants involving performance of their public duties; (10) various public demonstrations, protests, and confrontations intended to attract attention to his causes. Ex. A: Aff. Perry Backus (Newsworthy) (Apr. 4, 2012).

3. In 2006, Spreadbury determined that pallets stacked near his property

constituted a fire hazard and public nuisance. He believed the matter to be a public concern and in addition to complaining to the Ravalli County Sheriff's Department and the County Sanitarian, he gathered ten signatures on a petition, which he submitted to Sheriff Hoffman, County Attorney Corn and the Ravalli County Clerk and Recorder. Dkt. 126-1 at 6-9; Ex. B: Pet. Ravalli Co. (July 20, 2006).

4. Not satisfied, Spreadbury took the issue to Montana Attorney General Mike McGrath and Governor Brian Schweitzer by letter in September 18, 2006. Dkt. 126-1 at 8-10.

5. Ultimately, Spreadbury confronted his neighbor on October 10, 2006, and after an altercation, was cited for misdemeanor assault. Dkt. 126-1 at 11-12.

6. On April 11, 2007 Spreadbury initiated and circulated recall petitions for Sheriff Hoffman and County Attorney Corn, claiming they were failing to protect the rights of citizens. Spreadbury sent the Petitions to the Flathead County Attorney and contacted the Montana Attorney General's Office in April 2007 for a second time. Dkt. 126-1 at 14.

7. Spreadbury took the issues up with Montana's Senators. He wrote Senator Baucus and Tester, requesting "a congressional inquiry into civil rights crimes and criminal conspiracy in Western Montana and Ravalli County" on August 29, 2007. He followed up with Baucus' office on October 19, 2007, claiming "[p]rotecting prosecutors and the situation in Ravalli County is a form of

conspiracy.” Ex. C: Ltr. M. Spreadbury to J. Messina at Baucus Office (Oct. 19, 2007).

8. On January 26, 2009 Spreadbury resubmitted Petitions to recall Sheriff Hoffman and County Attorney Corn. Ex. D: Pet. Recall Sheriff Hoffman (Jan. 26, 2009); Ex. E: Pet. Recall Ravalli Co. Atty. Corn (Jan. 26, 2009).

9. In the Petition to recall George H. Corn, Spreadbury cited “incompetence” and “oath of office” as reason for the recall. Spreadbury alleged Corn committed state and federal constitutional crimes against Ravalli County residents and violated his sworn oath of office by not upholding the Montana Constitution, alleging Corn failed to protect citizens’ right to a healthy environment. *See* Ex. E.

10. Similarly, in his Petition to recall Ravalli County Sheriff Hoffman, Spreadbury alleged Hoffman was incompetent because he “knowingly allowed deputies to violate civil rights of Ravalli County Residents.” Spreadbury also alleged Hoffman was incompetent in gathering evidence “in a non-equal manner” which “puts justice in jeopardy for Ravalli County residents.” *See* Ex. D.

11. The Petitions were denied as they did not meet the requirements of the law. Spreadbury appealed to Montana Secretary of State Linda McCulloch by letter dated February 10, 2009, claiming equal protection violations and his right to petition the government had been violated. Ex. F: Ltr. M. Spreadbury to L.

McCulloch (Feb. 10, 2009).

12. In addition to gathering signatures at public places, Spreadbury took his concerns about citizens' rights to the Ravalli County Commissioners. His conduct led the Commissioners to send Spreadbury a letter on February 17, 2009, referencing his "disorderly conduct and intimidation of county employees." Referring to Spreadbury's visits to the Clerk and Recorder's office on February 13, and February 5, 2009, the Commissioners stated "both of these visits caused disruptions of the operations of the Clerk and Recorder's office and other adjacent offices, and were alarming enough to have county employees contact law enforcement." The letter warned Spreadbury that "[i]nappropriate, abusive behavior toward employees will not be tolerated...[and] if you wish to continue to conduct business at the Ravalli County Offices, we are advising you to conduct yourself appropriately at all times by not yelling, making abusive remarks, or attempting to intimidate our employees in any manner." Ex. G: Ltr. Bd. Ravalli Co. Commrs. to M. Spreadbury via certified mail - refused (Feb. 17, 2009).

13. On March 5, 2009 Spreadbury sent another letter to Montana Secretary of State McCulloch. Enclosed was a Petition to recall Montana Attorney General Steve Bullock. The Petition, dated January 26, 2009, alleged Bullock "presides over a justice system that is top to bottom corrupt" and that Bullock "does not uphold justice." The letter also requested McCulloch "refuse to certify any

election for the City of Hamilton” alleging the request was for safety “...from the out of control police force and local judicial system.” Ex. H: Ltr. M. Spreadbury to L. McCulloch with Recall Pet. For Atty. General Steve Bullock (Mar. 5, 2009).

14. The Petition was denied on March 13, 2009 which merely prompted Spreadbury to resubmit the Petition. Ex. I: Ltr. L. Kimmet to M. Spreadbury (Mar. 13, 2009). On March 23, 2009, McCulloch’s office sent Spreadbury a legal opinion on why it believed the resubmitted recall petition did not meet the applicable requirements of law. Ex. J: Ltr. J. Quintana to M. Spreadbury (Mar. 23, 2009).

15. Spreadbury had succeeded in attracting attention to his cause. On February 19, 2009 the *Ravalli Republic* published an article about the County’s letter to Spreadbury. The article explained Spreadbury was seeking to recall Sheriff Chris Hoffman, County Attorney George Corn and Montana Attorney General Steve Bullock, and was accusing County and City government of corruption. The article noted the Commissioners were prompted to send the warning letter after Spreadbury stood outside the County Administration building with a paper bag over his head holding an upside down American flag and taking pictures of himself. See Ex. K: *Ravalli Republic, County sends man a warning letter* (Feb. 19, 2009) (available at http://ravallirepublic.com/news/article_c67f88c9-22d3-5e88-9b31-1587182aa0e1.html?mode=story).

16. In May or June of 2009, Spreadbury attempted to have a letter addressed to President Barrack Obama, added to the reserve collection in the Bitterroot Public Library (“Library”). Dkt. 90 at 8. The letter alleged corruption by local officials, stating, “[t]here are no civil rights here, there is no justice here, and there is no one to appeal to.” The letter describes Ravalli County as the “Holy Grail of Injustice in America.” Dkt. 152-2, Ex. B. It argues the City of Hamilton is not incorporated, claiming the city limits were never established, no census of the population was ever taken, and there was no election held by those citizens to establish the “City of Hamilton.” Dkt. 152-1&2, Ex. A & B; Dkt. 90 at ¶ 31. The letter gives specific examples of alleged misconduct by the Hamilton Police Department, including a 2001 unsolved homicide, five inmates hanging themselves in the Ravalli County jail in 2005, and the City’s Fire Department not being equipped to handle potential fires at the Rocky Mountain Lab. Dkt. 152-2, Ex. B. The letter details various complaints sent to Montana Senators Max Baucus and John Tester, along with complaints to Montana Representative Denny Rehberg. Dkt. 152-2, Ex. B. It takes specific aim at Ravalli County Attorney Corn, claiming the attorney to be “the most powerful man in American to whom our State Senators and Congressman all report directly.” Dkt. 152-2, Ex. B. The letter compares the City of Hamilton to the Soviet Union in 1989. Dkt. 152-2, Ex. B.

17. Roddy, on behalf of the Library, refused to admit the letter, informing

Spreadbury the Library was not a depository for personal letters. Spreadbury responded that it was not a personal letter, that county officials were corrupt and that he would attend the next Library Board meeting to complain. Dkt. 152-1, Ex. A; Dkt. 90 at ¶ 32.

18. Spreadbury made a similar demand to the North Valley Library (“North Valley”) in Stevensville, Montana. North Valley also refused Spreadbury’s request. Dkt. 152-3, Ex. C.

19. On June 8, 2009, Spreadbury wrote to the Directors of both libraries arguing the letter should be placed on the reserve shelves of the respective library because it is matter of public concern, stating “[t]he subject matter [of the letter] is justice within Ravalli County and Montana; it meets a public informational need.” He further explained, “[i]n this case, it is a critical and emergent situation to civil rights, justice, and general public safety... I think the public has a right to know about these crimes, and the efforts of concerned citizens; this includes the letter to the President of the United States from March, 2009.” Dkt. 152-4, Ex. D.

20. Spreadbury then engaged in numerous altercations with Library staff, resulting in calls to the police and eventually was banned from the Library. Dkt. 90 at ¶¶ 33-35; Dkt. 152-7 thru 9, Exs. G, H, I, J, K.

21. Spreadbury was notified of the ban by letter, dated June 11, 2009. Dkt. 152-10, Ex. L. He took the letter to City Hall and demanded Officer Jake

Auch file it as a as a false report. Office Auch told Spreadbury that he would investigate, but this merely agitated Spreadbury. Dkt. 152-11, Exs. M, N.

22. On June 16, 2009, Spreadbury emailed Library Board member Ellyn Jones accusing Library Director, Gloria Langstaff of committing a crime by giving information to the Hamilton Police Department. He attached a copy of his internet page which he said “gets 500 + hits per week” and could be “updated” by him about the Library. Dkt. 152-13, Ex. Q.

23. On July 8, 2009, Spreadbury submitted a Reconsideration Request Form to the Library, again demanding that the letter addressed to President Obama be placed on reserve in the Library. Dkt. 152-14, Ex. R.

24. Spreadbury’s protests were not limited to the Library. During the same time period, police responded to a complaint about Spreadbury’s behavior at the *Ravalli Republic’s* offices. The call was made after numerous confrontations Spreadbury had with employees at the *Ravalli Republic*, including an incident during which Spreadbury told employees the paper was “over” and “done.” Spreadbury was told by *Ravalli Republic* employee John Cramer that he was no longer permitted to enter the newspaper’s place of business. Dkt. 152-9, Exs. S, T, K. The *Ravalli Republic* sent a follow-up letter to Spreadbury on July 10, 2009 stating: “Given the past interaction you have had with members of the *Ravalli Republic* team, we will no longer allow you to enter our physical premises located

at 232 Main Street, Hamilton, MT 59840.” Dkt. 152-15, Ex. U.

25. During this time, Spreadbury ran for Mayor of Hamilton, seeking to call attention to local corruption and claiming to be a watchdog of the people. *See* Ex. L: Bitterroot Rising Archives (2010) (available at <http://www.michaelspreadbury.com/2012/01/bitterroot-rising-archives-real-news.html>).

26. Spreadbury, an avid blogger, took his controversies on-line. His profile on www.blogger.com lists 16 blogs as “My blogs.” Ex. M: Blogger: User Profile: Michael Spreadbury (available at <http://www.blogger.com/profile/00402571676690707971>). The website www.michaelspreadbury.com is listed as “My Web Page.” The links to “My blogs” in Spreadbury’s profile are entitled: Hamilton, Montana; Lee Enterprises Sucks – The Truth about Lee Enterprises Inc. (NYSE); Federal RICO Lawsuit – Investigate Blogger Crystal Cox; Michael Spreadbury – Crystal Cox Blog Exposing Montana Corruption; MONTANA COMMISSIONS – Crystal Cox Blog, if you would like US to Consider a Retraction; PERRY BACKUS – Ravalli Republic – Lee Enterprises; Montana Recreation; Nobody 2012 – Vote Nobody 2012; Across Montana; MARY JUNCK – Lee Enterprises; Royce C. Engstrom – University of Montana Protecting Montana Corruption; Steve Bullock Montana Attorney General – Steve Bullock Governor? NOT!!; Bankruptcy Corruption; The

Big Picture; Montana Dare; and Judge Whistleblower – Time to Expose Corrupt Judges. *See* Ex. M.

27. Spreadbury’s profile reflects he has been “On Blogger since August 2009,” and his profile picture depicts a man wearing a paper bag with eyes cut out, holding an American flag upside down, and standing next to the Ravalli County Courthouse. *See* Ex. M.

28. The website, <http://www.michaelspreadbury.com>, listed as “My Webpage” on Spreadbury’s profile, is entitled, “Michael Spreadbury – Crystal Cox Blog Exposing Montana Corruption.” Ex. N: Michael Spreadbury - Crystal Cox Blog Exposing Montana Corruption (2011) (available at <http://michaelspreadbury.com/search?updated-min=2011-01-01T00:00:00-08:00&up>). The website contains numerous posts promoting and arguing Spreadbury’s public controversies. For example, on August 9, 2009 Spreadbury posted an article entitled, “Ravalli County Sheriff Department,” complaining of the Sheriff’s alleged use of tasers, accusing the department of not adequately protecting residents from potential flooding events, and complaining about the Ravalli County judicial system. The article claims, “[w]e as residents are presented with ‘local terror’ as we contact the law enforcement and judicial system in Ravalli County.” Ex. O: Blog: *Ravalli Co. Sheriff Dept.* (Aug. 8, 2009) (available at <http://www.michaelspreadbury.com/search?updated-min=2009-01->

01T00:00:00-08:00&updated-max=2010-01-01T00:00:00-08:00&max-results=5).

29. Spreadbury also uses the website to argue the City of Hamilton does not exist and posts a February 25, 2010 video as evidence. Ex. P: Michael Spreadbury-Crystal Cox Blog Exposing Montana Corruption (2012) (available at <http://www.michaelspreadbury.com/search?updated-min=2012-01-01T00:00:00-08:00&updated-max=2013-01-01T00:00:00-08:00&max-results=3>).

30. Various web sites publish Spreadbury's public concern regarding the National Institutes of Health Rocky Mountain Lab, claiming he and blogger Crystal Cox "have collected information on the Rocky Mountain Labs for a few years now." He argues the Lab does not have a required fire/bio hazmat facility, nor is the City of Hamilton properly equipped to deal with potential fire hazards from the Lab. Spreadbury also claims environmental problems with Lab including: "1) clean water act, 2) Low Frequency Emissions into neighborhoods surrounding the Hamilton, MT facility, 3) safety of Infectious Agents." *See* Ex. P.

31. Spreadbury's campaign against the Library was amplified in his online posts, where he boasts 10 million readers have viewed the letter addressed to President Obama. *See* Ex. N.

32. Spreadbury accuses the Library Director of criminal acts and embezzling; claiming the Library "is run by terrorists worried that the rule of law, and the US Constitution will return to Hamilton, Montana." Ex. Q: Library Thing

(available at <http://www.librarything.com/profile/Spreadbury>).

33. On August 25, 2009, Spreadbury wrote on the “Bitterroot Rising” website that Director Langstaff was violating the law and the Library was working with the Hamilton Police to commit crimes and to violate his rights. He alleged that he was going to expose embezzlement that was occurring at the Library. Dkt. 152-21, Ex. CC.

34. The Bitterroot Rising website continued to publicize and give voice to Spreadbury’s multiple public controversies. Some examples include: a September 31, 2007 post alleging a cover up by the Hamilton Police Department of a felony hit and run; an October 25, 2007 post alleging Montana civil rights transgressions, Attorney General and others assisting perpetrators and co-conspirators; a January 28, 2010 post announcing a film entitled, “Beneath the Beauty” described as, “a documentary film on local and national Justice issues”; September 3, 2010, calling for resignation of Public Defender Randi Hood; posting the letter addressed to President Obama; arguing the City of Hamilton does not exist; and calling for the termination of Ravalli County Deputy Oster, among others. *See* Ex. L.

35. Spreadbury posted numerous letters and documents on-line which dealt with his public controversies, including but not limited to: the Complaints against Ravalli County Attorney Corn, the Complaint against a Library employee, and a July 2010 Complaint filed against the U.S. Department of Health and Human

Services, National Institute of Health, Francis Collins, and Marshall Bloom. *See* Ex. L.; *See* Ex. P.

36. Likewise, Spreadbury created numerous videos he considered in the public interest and posted them on-line to view. Ex. R: Michael Spreadbury Youtube MT (available at <http://www.youtube.com/user/BaucusTruthUSA>; <http://www.youtube.com/watch?v=b0tWb2coeHg>).

37. Spreadbury's activities continued to be newsworthy. After he continued to return to the Library and confront Library employees to protest his banning and assert his right to be there, Spreadbury was charged with criminal trespass. Dkt. 90 at ¶¶ 43-46. On September 10, 2009, the *Ravalli Republic* reported the trespass charge. Dkt. 90 at ¶ 49; Dkt. 57-1, Ex. B.

38. People in the community were interested. Third parties made comments about the article on the *Ravalli Republic's* website. Dkt. 90 at ¶¶ 50, 51; Dkt. 84-1.

39. On November 3, 2009 the *Ravalli Republic* reported that Spreadbury had spent the previous day in court on procedural matters concerning his criminal trespass case. Ex. S: *Ravalli Republic, Candidate attends procedural hearing* (Nov. 3, 2009) (available at http://ravallirepublic.com/news/article_882790fa-e603-559c-aefa-b7fb078655af.html?mode=story).

40. While Spreadbury's criminal trespass charges were pending, he

confronted employee Roddy outside the Library resulting in an Order of Protection against Spreadbury and felony intimidation charges. Dkt. 57-1, Ex. D.

41. Both the *Missoulian* newspaper and the *Ravalli Republic* reported the intimidation charges brought against Spreadbury. Dkt. 57-1, Exs. E & F.

42. On February 18, 2010, a jury in the City Court for the City of Hamilton found Spreadbury guilty of criminal trespass. Spreadbury appealed the conviction. Dkt. 57-1, Exs. I & J.

43. Ever since his conviction, Spreadbury has brought numerous public complaints related to the supervision of law student intern, Angela Wezsteen, by the Ravalli County Attorney. Spreadbury alleges impropriety by Wezsteen and Attorney Corn, as well as the University of Montana School of Law, and its Deans, Ed Eck and Irma Russell. Ex. T: The Michael Spreadbury Find My Threat Story (Nov. 17, 2011) (available at <http://www.bitterrootvalleynews.com>).

44. On April 20, 2010, Spreadbury issued a written statement to the public that alleged misconduct by City Attorney Ken Bell at an order of protection hearing. The statement concluded with the following: "Get Ready for a constant pummeling in the courts. The hunters will become the hunted. Destroying the lives for ego is pricey on budgets." Dkt. 152, Ex. KK.

45. With the expressed intent of affecting the resolution of public controversies, Spreadbury began filing lawsuits. On May 11, 2010, he filed a

Complaint naming multiple parties, including Sheriff Hoffman, various Ravalli County Sheriff Deputies and County Attorney Corn, related to the public nuisance issue. Spreadbury sought approximately \$3.6 million in the suit. See Dkt. 126-1. The *Ravalli Republic* reported on the filing, apply titling the article, “Spreadbury files \$3.6 million lawsuit.” Ex. U: Ravalli Republic, *Spreadbury files \$3.6 million lawsuit* (June 9, 2010) (available at <http://www.ravallirepublic.com/news/local/crime-and-courts/c02525d2-736e-11df-b9ad-001cc4c002e0.html>).

46. In the same month, Spreadbury filed amended Complaints in separate suits against Roddy, a Library employee, Angela Wetzsteon and George Corn, employees of Ravalli County, and Kenneth Bell, attorney for the City of Hamilton. Dkt. 12-2, Ex. B; Dkt. 12-3, Ex. C; Dkt. 111-3, Ex. C.

47. In July 2010 Spreadbury filed a Complaint against the U.S. Department of Health and Human Services, National Institute of Health, Francis Collins, and Marshall Bloom. The lawsuit complained of public safety concerns with the Rocky Mountain Labs. Ex. V: Complaint, Cause No. CV-10-81-M-DWM-JCL (July 30, 2010).

48. The Defendants Roddy, et al filed Motions for Summary Judgment and Judge Larson heard oral argument on August 6, 2010. Dkt. 111-4, Exs. D, E & F. Also, on August 6, 2010, the Ravalli District Court had a pretrial conference

for Spreadbury's appeal from his conviction of criminal trespass. Dkt. 111-4, Ex. G. A *Ravalli Republic* Reporter attended the hearings, at which Mr. Spreadbury represented himself, because he had become a newsworthy public figure. See Ex. A.

49. On August 9, 2010, the *Ravalli Republic* published an article reporting on the August 6, 2010 hearings. The article correctly reported on the hearings but in background, mistakenly stated Spreadbury was previously convicted of disturbing the peace, instead of criminal trespass. Dkt. 124-11, Ex. K.

50. Spreadbury notified the *Ravalli Republic* of the error and on August 24, 2010, the *Ravalli Republic* published a correction. Dkt. 90; Dkt. 111, Ex. J.

51. Lee Enterprises used reasonable care and did not breach the standard of care for professional journalists in fact checking and publishing the August 9, 2010 article, and followed the standard practices of newspapers in fact checking and making corrections. Ex. W: Aff. Perry Backus (Standard of Care) (Apr. 4, 2012; Ex. X: Aff. Sherry Devlin (Apr. 2, 2012).

52. Spreadbury's public campaign against local corruption and alleged constitutional violations did not end with his election defeat, but continues unabated to this day. He claims responsibility for the 2010 election of William Fullbright, posting "My mission against an 'invincible' opponent has ended in success. It took everything I had, more than I should have had to give. It was

worth it: freedom and justice for the Bitterroot Valley.” Ex. Y: Bitterroot Rising Archives (2010) (available at <http://www.michaelspreadbury.com/2012/01/bitterroot-rising-archives-real-news.html>). In countless blogs and postings, Spreadbury continues to call for public awareness and action on the same issues, the alleged corruption of George Corn, Chris Hoffman, Steve Bullock, Ravalli County law enforcement and courts; the corruption of Lee Enterprises, the deprivation of constitutional rights by local government; the inaccessibility (to him) of the Library; deficiencies in the city government and city incorporation, and multiple other public issues into which he has interjected himself with the intent to affect the outcome. *See* Exs. M, L, P, N, Y, R.

53. As recently as December 6, 2011, in a post entitled “RE-NEW THE VISION,” Spreadbury boasts that for the last 5 years he has been on a “journey” to expose these issues of corruption in Montana that no “person dared expose.” The article goes on to mention Spreadbury’s accomplishments and goals. “The last leg is to remove Steve Bullock from office, Attorney General currently running for
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Governor of Montana.” See Ex. N.

DATED this 4th day of April, 2012.

/s/ Jeffrey B. Smith
Attorneys for Defendant, Lee Enterprises, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of April, 2012, a copy of the foregoing document was served on the following persons by the following means:

2 CM/ECF
 Hand Delivery
1 Mail
 Overnight Delivery Service
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**EXHIBITS TO STATEMENT OF UNDISPUTED FACTS
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

EXHIBIT

- A. Aff. Perry Backus (Newsworthy) (Apr. 4, 2012).
- B. Pet. Ravalli Co. (July 20, 2006).
- C. Ltr. M. Spreadbury to J. Messina at Baucus Office (Oct. 19, 2007).
- D. Pet. Recall Sheriff Hoffman (Jan. 26, 2009).
- E. Pet. Recall Ravalli Co. Atty. Corn (Jan. 26, 2009).
- F. Ltr. M. Spreadbury to L. McCulloch (Feb. 10, 2009).
- G. Ltr. Bd. Ravalli Co. Commrs. To M. Spreadbury via certified mail – refused (Feb. 17, 2009).
- H. Ltr. M. Spreadbury to L. McCulloch with Recall Pet. For Atty. General Steve Bullock (Mar. 5, 2009).
- I. Ltr. L. Kimmet to M. Spreadbury (Mar. 13, 2009).
- J. Ltr. J. Quintana to M. Spreadbury (Mar. 23, 2009).
- K. Ravalli Republic, *County sends man a warning letter* (Feb. 19, 2009) (available at http://ravallirepublic.com/news/article_c67f88c9-22d3-5e88-9b31-1587182aa0e1.html?mode=story).
- L. Blog - Bitterroot Rising Archives (2010) (available at <http://www.michaelspreadbury.com/2012/01/bitterroot-rising-archives-real-news.html>).
- M. Blogger: User Profile: Michael Spreadbury (available at <http://www.blogger.com/profile/00402571676690707971>).
- N. Michael Spreadbury - Crystal Cox Blog Exposing Montana Corruption (2011) (available at <http://michaelspreadbury.com/search?updated-min=2011-01-01T00:00:00-08:00&up>).

- O. Blog: *Ravalli Co. Sheriff Dept.* (Aug. 8, 2009) (available at <http://www.michaelspreadbury.com/search?updated-min=2009-01-01T00:00:00-08:00&updated-max=2010-01-01T00:00:00-08:00&max-results=5>).
- P. Michael Spreadbury-Crystal Cox Blog Exposing Montana Corruption (2012) (available at <http://www.michaelspreadbury.com/search?updated-min=2012-01-01T00:00:00-08:00&updated-max=2013-01-01T00:00:00-08:00&max-results=3>).
- Q. Library Thing (available at <http://www.librarything.com/profile/Spreadbury>).
- R. Michael Spreadbury Youtube MT (available at <http://www.youtube.com/user/BaucusTruthUSA>; <http://www.youtube.com/watch?v=b0tWb2coeHg>).
- S. Ravalli Republic, *Candidate attends procedural hearing* (Nov. 3, 2009) (available at http://ravallirepublic.com/news/article_882790fa-e603-559c-aefa-b7fb078655af.html?mode=story).
- T. The Michael Spreadbury Find My Threat Story (Nov. 17, 2011) (available at <http://www.bitterrootvalleynews.com>).
- U. Ravalli Republic, *Spreadbury files \$3.6 million lawsuit* (June 9, 2010) (available at <http://www.ravallirepublic.com/news/local/crime-and-courts/c02525d2-736e-11df-b9ad-001cc4c002e0.html>).
- V. Complaint, Cause No. CV-10-81-M-DWM-JCL (July 30, 2010).
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- Y. Bitterroot Rising Archives (2010) (available at <http://www.michaelspreadbury.com/2012/01/bitterroot-rising-archives-real-news.html>).