

Supporting Documentation in order below was provided by Idaho Fish and Game under public records request, sworn testimony, newspaper archives, and other sources.

I. Stewardship of Equipment :

- A. (1-16) Redacted Inventory of issued equipment for 8 region 1 officers. Following the redacted inventory, is the original inventory without redaction:
Boat, four wheeler, snow machine and motorcycle. All redacted for no apparent reason.
- B. (1-5) Photographs of Stanley's IDFG truck filled with slab rock project at home:
 - Idaho Fish and Game policy:
 - "The transporting of firewood in a state-owned vehicle (even when cut or collected while off duty) is prohibited when such firewood is to be used for personal benefit."
- C. (1-2) Stanley's IDFG 4-wheeler left unsheltered
- D. Email from DCO Rhodes to SCO Bowen concerning use of equipment:
 - "I have absolutely no problem with our folks using Department phones (or other equipment for that matter) for personal stuff as long as we make things right."
- E. Email from DCO Rhodes about cutting operations instead of personnel:
 - "Since nobody wants to get laid off, and nobody wants to lay anyone off, we would have to cut operating. Of course the largest part of that is salary and without layoffs, that is a constant. We'll have to cut other expenditures"
 - "...for cell phone, landline and internet for every officer."
 - "I can also foresee that fleet equipment that is not being used very much could go away."
 - "...like training and professional development...not being funded very well, if at all. I don't want to sit at home and not work."
 - "...if all you have is an IDFG cell phone or landline. Decide if you need an ATV and a motorcycle, and which you'd get rid of it if had to be done."

II. Children and Family at Work:

- A. Email from SCO Bowen to DCO Rhodes:
 - "Okay. I am planning to bring my daughter along tomorrow to do a CDA boat patrol. I'll try to stop by the RO and pick up those tape measures."
- B. (1-3) Three page series of emails by Rhodes, concerning Rhodes' lack of setting standards and enforcing policy:
 - "I intend to start now. I never want to be a mean guy and don't want to do business that way. However, I've been letting some things slide that I should not. It is not fair of me to expect you guys to always know all of my concerns because I don't voice them all to you. On issues like the CPT, evaluations, accomplishment of goals, time management, working with your kids, prioritization of duties, my feet are going to be held to the fire, and rightly so."
 - "...Bureau was not all that happy about were the result of my actions, or lack thereof."

- “My inaction has caused you guys some embarrassment and grief and that’s not fair to anyone. I’m learning this job as I go.”
- “Issues like CPT balances, taking your kids to work, what holster you wear....”
- “...so I try to ignore them for the most part.”
- “If you are on the computer writing a case report, it is enforcement, not administration. If you’re writing a news article about a youth waterfowl hunt it is something other than administration.”
- “Routine patrols that are building CPT need to be limited or eliminated.”

C. (1-7) SCO Hugo sworn testimony in Judge McFadden’s court concerning bringing children to work:

- *Mr. Palmer:* “In 12 months you’re maybe getting a hundred hours of overtime correct? In a 12 month period.”
Jerry Hugo: “Yes, by the time December 1, most of the off season times.”
- *Mr. Palmer:* “And in the past that’s got as high as over three hundred.”
Jerry Hugo: “Yeah we used to work a lot. That’s why we take our kids with us a lot so we can actually spend time with them and be with them in the field. So we can enjoy.”
- *Mr. Smith:* “Do officers get the chance to bring their children to work related activities?”
Jerry Hugo: “...Bring them on low probability of enforcement confrontations or matters. Floating rivers, you know, horseback rides, canoeing, snow machine trips. Those kind of things that we know are not gonna probably have you know, enforcement situation...yeah, Braylen’s been out with us just this past January we took him on a snow machine trip up Myrtle Creek, St. Joe River country. And did a snow patrol together with Mark and Braylen. And he’s had him out a couple other times but I can’t recall exactly when those times were. But whenever he can, he he brings his children with us. It’s an adventure that few children get to enjoy with their parents.”
- *Jerry Hugo:* “Well I would consider it more of a part time. I mean it’s a full time position but we’re not. We work when the demands are there or when we feel that it’s important for us to be out there...So the officer decides on when he goes or not.”
- *Jerry Hugo:* “I wouldn’t say there’s any specific requirements. We may work 70, 75 hours one week and we may not work at all the next several weeks. Taken off comp time and over time that we’ve accrued.”
- *Jerry Hugo:* “We decide when we need to work and when we don’t need to. And often times we can take large blocks of time to be with our children...It’s actually very loose...We tend to dictate when we work and when we don’t.”
- *Jerry Hugo:* “That implies to just about every officer in the state that I know.”
- *Mr. Palmer:* “He can essentially say, I’ll be to work, you know whatever, Sunday, Monday Tuesday if he likes to do so.”

Jerry Hugo: "Yeah, again, he or she, we have female officers too now, you know can pretty decide when they need to be there and when they don't."

- *Mr. Palmer:* "Is this a recent development? Or is this something that's been in place as long as you've been involved with the Fish and Game?"
- *Jerry Hugo:* "I've been an officer for over 20 years and this is how they still run it."

D. Sworn Courtroom testimony by Regional Investigator Overman in Judge Friedlander's court concerning children on the job:

Dave Overman: "Um, Mark's had her at the regional office in Coeur d'Alene. When he had to come in and process paperwork, he brought her with him. I do the same things with my daughter. Take our, both of our daughters have gone with us on boat rides on the lake..."

E. (1-3) SCO Hugo giving sworn testimony in Judge Friedlander's court:

- *Mr. Smith:* "Has Mark brought Braylen on drive alongs at work?"
Jerry Hugo: "Yeah. When we have specific non-enforcement type of patrols, where he could come out with us on snow machine patrols. He went with us on that, and actually got to see wolves. He was pretty excited about that. And we went on an ATV trip once. And then had to hike the rest of the way into some high mountain lakes and patrol for checking for licenses on fisherman."
- *Mr. Smith:* "Were those trips where Braylen was there; were those trips that the department encouraged the family to go?"
Jerry Hugo: "Yeah...Often times we'll float the river and we'll take our kids. I used to take my daughters all the time."
- *Jerry Hugo:* "...It can account for an entire week. Actually put an entire week in your office just working on the computer. I don't like to do..."

III. Interaction with the Public:

A. Conservation Enforcement Creed

- "To assist the public in their compliance and regulations;"
- "To save unfortunate offenders from unnecessary humiliation, inconvenience and distress;"
- "Never to cite if a warning would be better;"
- "Never to scold or reprimand, but rather to respect and inform."

B. (1-6) The State of Idaho vs. Michael G. Long

- *The Court:* "Pursuant to Rule 29 uh, I'll find that there's insufficient evidence for...And again, I think everyone's in agreement, if he did not violate the trespassing statute, he obviously did not violate the taking a - taking a game animal unlawfully. Bring the jury back."

C. (1-3) Affidavit of Charles LeCount:

- "I run a gleaning program thru the State of Idaho for the disadvantaged and elderly and I happened to be in need of a permit from Mark Bowen. I had to get

a permit in order to release the meat for a moose and a deer that had been killed, so I thought I would kill two birds with one stone.”

- “Mark Bowen then told me that the game warden before and been pretty strict on things and that there wasn’t going to be anymore leniency from either himself or Josh (Josh Stanley). I had never done anything wrong and there was never a need for leniency in the first place.”
- “I felt as though I was threatened with Mark Bowen’s authority as a conservation officer to put my status with the program in jeopardy or to remove the program for no just cause.”

D. (1-9) Lawsuit filed against IDFG in federal court, Blain Murray:

- “Blaine Murray was convicted of ‘Violating Forest Service Road Closure’ without citing to any Idaho Statute.”
- “Plaintiff Blaine Murray appealed his conviction to the Fremont County District Court where the conviction was overturned”

IV. Resource Management (Operation Snowball)

A. IDFG version of Operation Snowball:

- “...vague reports...Operation Snowball...Violations were reported to include illegal baiting, closed season elk harvest, hunting without licenses & tags, over limit of elk, and construction of illegal structures.”
- “Citations were written for 17 charges, ranging from fishing without a license to transfer of tag, to taking an elk during closed season.”

B. (1-2) Spokesman Review article concerning Operation Snowball:

- “...Operation Snowball.”
- “...he said, adding that he takes pleasure in making such arrests. ‘These guys generally have all the meat they could ever eat, but they just keep on killing....Those are the guys all game wardens like to get.’”

C. (1-5) Misdemeanors charged in Operation Snowball

D. (1-2) SCO Hugo email pre Operation Snowball concerning instructions:

- “Bring your FRS’s to scan and listen to channel 3 for bad guy traffic.
- “...you can use the Satellite Phone. I talked with Carrie at home for almost 2 minutes without interruption from there.”
- “Everyone take LOTS of photos for case purposes, power point, Christmas party and just fun.”
- “This well oiled machine is up and running now and ready to kick some ass!!!!”

E. (1-14) Operation Daily Log of Operation Snowball. Shows use of good guy bad guy terminology:

- “...contacting bad guys.”
- “110 tells 121 that the ridge is void of bad guys...”

F. Post Operation Snowball email from SCO Hugo:

- “There were not evidently any cow elk presented to the bad guys in our work area or I know they would have killed them early. To have us all up and running so flawlessly and not have more crime go down was frustrating, but we got a lot any way I guess.”

G. (1-23) Time cards and law enforcement logs of those involved with Operation Snowball

H. (1-2) Credit Card and reimbursement purchases made for Operation Snowball

I. (1-8) **IDFG arrests man based on barroom stories, three articles about James L.**

Wilson the biggest liar in Calder:

- “This is the worst case I’ve ever seen in the state, “Shoshone County Prosecutor Jannece-Marie Skeen said. “A huge amount of evidence was seized.”
- “This is a very significant case, said Dean Sangrey, executive director of the Idaho Outfitters and Guides Board. ‘I’m very pleased to see these initial results.’ Jerry Hugo, a senior conservation officer of the Fish and Game, said the ‘ring of intentional poachers’ had devastating effects on the area’s wildlife populations. ‘They were taking a lot of fish and game using illegal methods during closed seasons and using transferred tags,’ Hugo said. “In several instances, fish and game were taken without any licenses or tags.”
- “They’re (unlicensed guides) not equipped, and they’re not trained, ‘ Loder said. “It’s a widespread problem.’
- “There’s been a lot of poaching going on for years,’ said Hugo, the conservation officer who first investigated Wilson. ‘We just want to make sure we get it stopped.’”
- “Prosecutors believe they have one of the most prolific poachers in the state in James Lavenen Wilson, a frail 57-year-old Calder man who has bounced from job to job.
- “With animals, it takes a long time to analyze the evidence,’ Skeen said. ‘There is a substantial amount of evidence.’”
- “What we thought three weeks ago was a simple case has suddenly blown into something much bigger,’ Skeen said. Wilson led multiple out-of-state groups, including one with eight people, Skeen said.
- “He will do time,’ Skeen promise.”
- “Wilson is charged with exchanging wildlife – a felony – for trading cutthroat trout for alcoholic beverages. He is also charged with felony possession and killing of wildlife and unlawful outfitting and guiding, a misdemeanor. Dean Sangrey, executive director of the Outfitters and Guides Licensing Board, said the arrest sends a ‘strong message.’”
- “In addition to illegally guiding, Wilson’s charging papers state that he unlawfully killed or possessed a bear, seven elk, wild turkey and cutthroat trout during October. According to the state, Wilson does have state hunting and fishing licenses, as well as deer and black bear tags. Authorities say that they believe more than one bear was taken.”
- “The evidence will speak for itself,’ said Jerry Hugo, a senior conservation officer with Fish and Game. ‘It is an extensive case.’”

- Deputy Prosecutor Jannece-Marie Skeen, who earlier this month called it the worst poaching case she'd ever seen, declined to discuss the case.”
- “Idaho Fish and Game Conservation Officer Jerry Hugo, who had said Wilson was part of a ‘ring of international poachers,’ would not discuss details of the case. Wilson family members said his release Friday validated their beliefs that the state had grossly overstated Wilson’s illegal activity. ‘The state of Idaho will come back with more charges,’ Wilson’s son, Brandon, said. ‘They’re persistent. They don’t like to look bad.’”
- “...Unit began investigating Wilson on a tip from Hugo.”
- “Piccinini said the undercover agents had said they’d bring him some meat, and that he thought it was a gift. Piccinini then gave Wilson a beer, with he later valued at \$1.75. ‘I just gave him a beer,’ Piccinini said this week. Wilson was later charged with a felony – unlawful exchange of wildlife – for the incident.”
- “Rod Wachtel, who runs The Big Eddy Resort, said the agents ‘stuck out like a sore thumb’ and were ‘out to bust everybody.’”
- “‘They had a horse trailer with no horses, a truck without mud, and they looked like Cabela hunters,’ he said, referring to the popular outfitting company. ‘They were completely out of place.’”
- “What agents thought was a substantial amount of evidence- Wilson was charged with unlawfully killing and processing a bear, seven elk, wild turkey and cutthroat trout- has been difficult to locate. Wilson says that’s because the animals never existed.”
- “They were conning me,” Wilson said of the undercover agents, “and I was conning them.”

V. Cabins and Use:

- A. Email from SCO Bowen mentioning use of IDFG cabin with relatives:
 - “I plan to have relatives in town around 8/10 – 8/17. I am using the Magee Cabin then and do plan to work some while they are here.”
- B. Email by DCO Rhodes concerning SCO Bowen using Magee Cabin:
 - “Bowen will be working/playing in at Magee from Thursday the 10th until the middle of next week”
- C. (1-5) Email by SCO Bowen talking about having his family at an IDFG cabin and corresponding time records:
 - “I’ll have family with their 5th wheel trailer there also.”
- D. Email exchange between SCO Bowen and SCO Bogar concerning condition of an IDFG cabin:
 - “I replaced four mantles which were shot so you might want to pick some more up. The east window on the south wall still falls down once opened and about took my wife’s fingers off.”
- E. Email from SCO Bowen to SCO Bogar:

- “I am going to send out a regional letter so everyone who does use the cabin knows what is expected of them to clean up and make things better.”
 - “I wanted to inform you we cleaned it and left it in better condition than it was when we arrived. He said something about egg or pancake batter being on the table.”
- F. (1-4) Email from SCO Stanley to SCO Bowen indicating a trip to an IDFG cabin with his family:
- “Also, I’m headed to the Midget Crk. Cabin on Monday and will be down there for the week with family and doing some patrol. That’s all for now.”
- G. Email from CO John McLain addressed to 1st FishGame concerning the Kelly Creek cabin and how to notify if the stay is for business or pleasure:
- “The Kelly Creek cabin will be open for business sometime in the next couple weeks. As always, enforcement has priority for work purposes... There will likely be some projects at the cabin this summer to help justify your trip, as if stunning scenery, cutthroat trout, and wildlife is not enough. The cabin has 4-5 beds and 2 couches, plus a large yard for tents or an RV or two. No power, propane only.”
- “...your name and if your stay is related to business or pleasure. Thanks.”
- H. Email exchange between SCO Bowen and DCO Rhodes:
- “...squatters somewhere around Killarney (I think that’s where she said) that she thinks may be on IDFG property, so you might give her a call and see if she needs some enforcement action.”
- I. (1-2) Law enforcement log pertaining to a trip SCO Bowen took

VI. Transparency and Public Records:

- (1-2) Record of overcharging hourly rates
- A. (1-2) Two copies of the same time card
- B. Letter from Rep. Phil Hart and Rep. Dick Harwood to RCO Craig Walker
- C. Explains lack of monitoring of IDFG computers off the network

VII. Additional Information and Exhibits

- A. (1-2) Game warden fact sheet for 2007
- B. (1-2) Email from Jon Heggen the Chief Enforcement of IDFG about Honor Guard
- C. (1-3) IDFG Fines and Forfeitures Revenue for 2006 and 2007
- D. (1-13) Amount and location of land owned by or leased to IDFG