

United States Department of the Interior

Bureau of Land Management Office of Law Enforcement & Security



Gold Butte Cattle Impound **THREAT ASSESSMENT**

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GOLD BUTTE CATTLE IMPOUND THREAT ASSESSMENT	DATE PREPARED: March 26, 2014
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OVERALL THREAT LEVEL

MODERATE

SUMMARY

Over the course of the last two decades, the Gold Butte Trespass case, its perceived political implications and its primary subject, Cliven Bundy, have garnered significant local and national media attention. In the States' Rights and Sovereign Citizen arenas, Bundy's "plight" has been highlighted as a prime example of the overstepping of federal authorities and a benchmark case for the Transfer of Public Land efforts throughout the West. Bundy himself is an aggressive and vocal proponent of States' Rights issues, ownership and transfer of public land to the States, the Constitutional authorities of federal LEOs on public land and the status of land and ranching operations in Nevada. Several of his family members espouse similar views and have taken up their father's cause both publically and privately in their own interactions with LEOs and government officials. Based on the notoriety of this case, the actions of Bundy and his inner circle over the years and the possibility that fringe elements may adopt Bundy's cause as a viable platform for action, the BLM Office of Law Enforcement and Security (OLES) assesses that there are three primary risks that need to be addressed when calculating the overall Risk Assessment for the Gold Butte Trespass Operation. These risks include (1) the Internal Threat stemming from Bundy, his family and his close associates; (2) local protests groups, activists and the threat of random acts of "Sagebrush Rebellion" activity aimed at disrupting LEO operations; and (3) the External Threat posed by violent or potentially violent States Rights/Sovereign Citizen-oriented groups or individuals. The BLM Office of Law Enforcement and Security has reviewed and analyzed these threats and has developed plans and SOPs to mitigate these risks where possible.¹

¹ For additional assessment data, see Appendix A, "Southern Nevada Counterterrorism Center Threat Assessment, March 2012" and Appendix B, "FBI Behavioral Analysis Unit's Assessment of Clive Bundy, March 2011"

RISK FACTOR #1
(Internal Threat)

Cliven Bundy / Family and Close Associates

THREAT LEVEL: MODERATE

This Risk Factor has two components; the first being Cliven Bundy himself, and the second being his family and close associates. While the two are intimately connected and BLM assesses that Bundy has significant influence over the actions of his family/close associates, the possibility of independent action on behalf of one or more of these individuals does exist. As such, BLM has looked closely at how to mitigate the overall risk factor and its individual components separately.



A. CLIVEN BUNDY

THREAT LEVEL: MODERATE

Over the past two decades, the subject of the investigation, Cliven Bundy ("Bundy"), has publicly stated his position of disagreement with the Bureau of Land Management ("BLM") in a myriad of venues. In a publication entitled "Hotline" on May 16, 1994, Bundy stated that BLM has no authority, that the endangered species act is illegal, and that the federal government is trespassing on what should be state or private land. Bundy went on to say, "I will do whatever it takes. If I don't show resistance, they'll come and do whatever they darn well please." In a related Las Vegas Review Journal Article on March 22, 1996, Bundy stated that he'll do whatever it takes ... even if he has to resort to armed resistance.

A review of BLM files shows Cliven Bundy has a long history of non-compliance and confrontation with the BLM dating back from 1993 to the present.² Bundy has failed to pay any of the fines thus far levied against him for the cattle trespass going back to 1993. While these encounters never devolved into direct violence towards any LEO or government officials, the passive threat of violence frequently permeated these encounters. Throughout the 1990s, several of Bundy's sons had run-ins with local, State and Federal LEOs resulting in charges ranging from Obstructing an Officer, Resisting Arrest and Failure to stop.³ Again, these interactions did not result in direct acts of violence, but were indicative of a pervasive disregard for LEO authority and overall non-compliance.

Throughout the 1990's to the present, the themes in Bundy's political rhetoric have changed little although his presentation has become more mainstream, academic and formalized. He is using social media, the blogosphere⁴ and organized events to express his Constitutionalist viewpoints and garner support for his cause. In recent years, Bundy has stepped up his media presence; however, he appears to have tempered his previously threatening language, or at least opted for more veiled language.

While he continues to state that he will "do whatever it takes to defend his family and his property," he has backed off on using specific terms such as "armed resistance," replacing these with threats of legal action, organized protests and more obtuse terms that could imply a whole spectrum of reactions to government action. These veiled threats may be part of Bundy's overall strategy to derail a round-up operation before it begins. He may believe that even the potential for a violent outcome may cause the federal government to take pause and rethink a round-up operation. Bundy is savvy enough to understand that if he keeps his threats obtuse, he does not risk violating any criminal laws while leaving enough of a question to make the government uncertain of his intentions.

In a March 2014 news article, Bundy stated, "I'm going to hold these people (BLM and others involved in a round-up) liable and legally accountable for their actions with any lawsuits that I need to do. And what if all that fails? If so, Bundy said he will circle the wagons and continue to "make as much noise" as he can. "I'll bring my friends, relatives and supporters together to protest against this whole thing. And then we will do whatever we have to do after that."⁵ In another article, Bundy stated, "I'll do whatever it takes to protect my life, liberty and property. I don't know what it will take. I guess a lot of media, family, friends, whoever will stand with me. I want to give fair warning. I will hold the state and county officials accountable and liable. I will also make any cowboy contractor who collects the cattle legally accountable. That means I'll sue 'em." In the same article, Bundy said, "Guns are not my intent."⁶ In March 2014, Bundy contacted a prospective BLM contractor threatening legal action if he partook in the BLM operation. He warned the contractor that he would turn his clients against him and slander him in the media. Bundy made no mention of, nor did he insinuate that, the contractor would face



any physical threat for his involvement.⁷

ASSESSMENT:

BLM assesses that Bundy's focus on legal and economic retribution, media exploitation and organized protests, coupled with his diminished physical threats, may be an indicator that Bundy himself is less prone to initiate or support pre-emptive violence against an LEO operation. The threats he has made to "do whatever it takes," appear to be more reactive than proactive, leaving BLM to assess that, although Bundy may support a violent reaction to a perceived threat to his property, family or person, he is not likely planning any preemptive strike against our operation. That being said, BLM does not have enough information to determine his threshold for this perceived threat or the precise trigger point that would elicit a violent response. BLM assesses that any moves against his private land/home, his person or his family would likely fall within this threshold. However, it is unclear whether his dispersed cattle fall within this realm. While a round-up of the dispersed cattle (those located off his private land) is the focal point of his entire cause, it is unclear whether he will resort to or support a violent response in order to protect these cows. This analysis has not determined a clear "line in the sand" in regards to what Bundy considers mere overstepping by the government versus a direct threat nor are we able to determine what his reaction would be to a direct threat. Given that Bundy himself has said he would, under certain circumstances, respond to a threat with violence, BLM must accept it as a possibility.

It is important to note that this cause has been Bundy's lifeblood for over two decades. He seems to revel in being called "the last Rancher in Nevada," and a hero for States Rights. Although Bundy's actions towards the BLM thus far have been measured and calculated, this is an emotional issue and with it may come emotional responses. If pressed into a corner and faced with having to defend his reputation, personal property and his "cause," his reactions may be hard to forecast. Bundy sees his personal, legal battle as a fight for the greater good and he sees himself as a champion of the local ranchers, private citizens and the State of Nevada against the evils of the federal government. As noted in a 2014 news article, "This is not just about trying to eliminate Cliven Bundy in the ranching business," Bundy said. "Because once I am off the land, they'll want you off the land too. Then the federal government will have full policing power and rule as though we were just a territory and not a sovereign state. So I'm not just fighting for my rights. I'm fighting for freedom, liberty, agency and access to their lands for all citizens in Clark County. Yes it is my rights on the line; but it is yours also."⁸

Once the operation begins, it will be important to maintain a low profile when operating around Bundy, his property and his supporters. It is likely that Bundy and his supporters will be waiting for any opportunity to escalate the situation yet remain "in the right," in the eyes of the media and the populace. As such, his group will likely be sensitive to even the slightest provocation on the part of law enforcement and will capitalize on any opportunity to justify going "hands on" with LEOs. They will also be looking for any opportunity to exploit the media coverage of the situation; so BLM expects to be video and audiotaped during any interactions with the public and during all aspects of the round-up.

Historically, Bundy has been the patriarch of his family and likely wields significant influence over the actions of his sons and close associates. That being said, several of his sons (Ryan in particular) have shown signs of more radical thinking and a predisposition for independent action. While BLM assesses that Bundy will likely call the shots in regards to any organized response, it is possible that his sons or associates may take matters into their own hands or act contrary to Bundy's directives if they are out on their own and confronted with a questionable scenario. This is why BLM has taken a closer look at key individuals within Bundy's inner



circle in order to address this possibility and establish some mitigating factors to limit them.

² In more recent times, January of 2003, Bundy became angry with a BLM fire crew and blocked their vehicle with his truck while threatening to "take you down right here." In July of 2011, Bundy was issued a citation by BLM for unauthorized use of public lands for diverting water ways. Again he was non-compliant and did not show up for his mandatory court appearance. Discussions with Mesquite Police Department ("PD") personnel in August of 2011 indicated that Cliven Bundy and his family have had several issues with the local authorities and according to the Detective, Mesquite PD uses extreme caution when dealing with them.

³ Ryan Bundy: (1994) Fail to pay entrance fee- ran from the NPS Rangers = 21 mile vehicle pursuit - arrested, charges dismissed; (2007) Obstruct an Officer - guilty/MSDM and Concealed Wpn violation- dismissed; Ammon Bundy: (1998) Resist Public Officer - guilty/MSDM; Mel Bundy: (1998) Resist Public Officer - guilty/MSDM; Cliven Lance Bundy: Recent Criminal History includes multiple Felony offenses (Burglary, Larceny of a Firearm; Contempt of Court, Drug-related offenses)

⁴ Personal Blog: www.bundy ranch.blogspot.com

⁵ <http://mvprogress.com/2014/03/19/bunkerville-rancher-prepares-to-battle-feds-again-for-land/> "Bunkerville Ranger Prepared to Battle Feds Again for Land," by Vernon Robison. Moapa Valley Progress. 03/19/2014

⁶ <http://www.thespectrum.com/apps/pbcs.dll/article?AID=/201403132002/DVTONLINE01/303130030> "Bundy Saddles Up," by Mike Donahue, Desert Valley Times 03/13/2014

⁷ For more information, see internal Memorandum of Interview- Scott Robins, 03/14/2014

⁸ <http://mvprogress.com/2014/03/19/bunkerville-rancher-prepares-to-battle-feds-again-for-land/> "Bunkerville Ranger Prepared to Battle Feds Again for Land," by Vernon Robison. Moapa Valley Progress. 03/19/2014

RISK MITIGATION: Tactical and Strategic

1. Tactical Planning: BLM intends to have a significant law enforcement presence during every aspect of the operation to ensure the safety of all the BLM employees (civilian and LEO), contractors and other official personnel. These mitigating factors will come into play not just for threats posed by Cliven Bundy and his family, but also those posed by external threats from protest groups, activists and violent extremists.

a. Incident Command Post (ICP): Access to the ICP will be closely monitored and controlled. The roads leading into the ICP and the individual facilities will be access controlled to ensure that only authorized personnel can enter the area. Uncleared personnel will require escorts at all times. All contractors and BLM personnel will have "color of the day" wristbands for easy identification.

b. Operational Area: A closure order will be put into effect on 27/March, providing a full week to clear the area of unauthorized persons prior to the start of operations circa 5/April. The closure order enables BLM LEOs to cite people for violating the closure order and remove/arrest them from the area if necessary. This will ensure that Bundy, as well as other family members, protestors or agitators can be legally and swiftly removed from the area if they try to enter during operations. As a first line of defense, uniformed LEOs will be deployed to critical road junctions around the closure area to block and turn away unauthorized traffic trying to enter into the area and to ensure that key access routes are cleared of possible blockades/obstacles. The second line of defense will be the "interdiction" teams, which will be in place at key locations around the impound sites intercepting potential threats as they are identified. Two static,



elevated LP/OP teams will also be monitoring the operational sites and relaying intelligence to the interdiction teams regarding potential threats. Additional roving teams will serve as back-up to the interdiction teams as needed and will assist in critical response.

- c. **Routes:** BLM has identified three ingress/egress sites into the impound area, none of which require passing Bundy's private residence/ranch. By varying the routes in and out of the operational site, BLM lessens the likelihood of a planned blockage/ambush/attack on official vehicles at various chokepoints along the routes. These routes also allow for more robust egress plans in case of an emergency. A checkpoint system has been emplaced along the routes to enable official vehicles to accurately convey their current locations, which will be essential in a critical incident or emergency egress. The checkpoint system also provides the ICP with a more accurate means of pinpointing the location of a potential threat and relaying this information to the deployed teams.
- d. **Critical Response:** Depending upon the nature and location of the critical incident, either the FBI SWAT Team and/or the NPS/USPP Special Event Tactical Team (SETT) will serve as the primary response force for a critical incident involving violence or the threat of violence. The FBI SWAT team's package includes a helicopter outfitted with FLIR and other specialized equipment, a Mine Resistant Armor Protected Vehicle (MRAP) and two hostage negotiators. The SETT Team, which is trained specifically to handle large demonstrations, crowd control and mass arrest scenarios, has the gambit of non-lethal and lethal weapons at their disposal. BLM investigative teams will deploy to all critical incidents to back-up the critical incident response teams, assist in the post-incident investigation and provide continual video coverage of the response to ensure that all LEO actions are properly documented.
- e. **First Amendment Area:** In order to provide protest groups a safe environment to gather and speak that will not impede operations; BLM will establish a designated "First Amendment" area. Several uniformed BLM LEOs will patrol the First Amendment area to provide overall security and assist in identifying and mitigating potential threats or issues. BLM will also integrate plain-clothed Special Agents into the area to monitor activity, collect intelligence and assist the SETT teams if a critical incident occurs. The SETT teams will be on stand-by near the First Amendment area, prepared to deploy if a critical incident erupts within this area.
- f. **Bundy's Home:** A covert LP/OP will provide 24/7 coverage on Bundy's private residence to monitor his movements and obtain intelligence regarding potentially dangerous behavior on the part of Bundy, his family or other visitors. This may provide early warning if Bundy or his associates are planning a mass movement out of his private residence and into key operational areas.
- g. **Cattle Pens/Convoys:** Cattle pens will be secured 24/7 by uniformed BLM personnel to ensure the integrity of the fence line is maintained and to ward off potential interference by activists. Convoys of cattle will be secured via unmarked BLM LEOs from the Nevada holding areas to the Utah Auction site. Coordination has been made with Nevada and Utah Highway Patrols and Utah Department of Public Safety to ensure quick response to any potential interference while the



trucks are in route.

- h. Auction Site:** Uniformed BLM LEOs will provide 24/7 coverage of the auction site throughout the duration of time that the cattle are present at the facility. In addition, a uniformed BLM LEO will provide security at the BLM Field Office during office hours, to protect BLM employees and monitor protest activity. The Sevier County Sheriff, as well as Sheriffs from the surrounding counties, have been briefed on the operation and the potential threats. The Sevier County Sheriff has assured BLM that he will provide appropriate response teams to react to any criminal activity involving the cattle in route or while at the auction house, which is private property.
- i. Training/Liaison Activities:** BLM plans to conduct a full day of tabletop exercises with key BLM, FBI and SETT leadership to discuss contingency plans and SOPs for critical incident response. This will ensure that all the key elements of the operation are in sync and communicating across agency lines. Internally, the BLM plans to brief every official participant on the threat assessment and the risks they may face. BLM leadership has planned for multiple venues to sensitize participating LEOs to the risks and SOPs for this event, to include; a Webinar a week prior to execution, a full staff in-brief two days before kick-off and shift briefings immediately before kick-off and prior to each shift. They will sensitize LEOs to the likelihood that Bundy and his supporters may try to provoke a reaction (verbal or otherwise) from them to serve his purposes. All Officers will be reminded of the high probability that they will be audio/video taped at any time and will make sure to direct any inquiries to the Public Affairs office or the ICP.

2. Strategic

- a.** At this time, BLM has no plans to enter Bundy's private property or residence and there is no arrest or search warrant tied to this case. As such, BLM's direct involvement with Bundy's person, family or private property at the onset of operations should be minimal. This may help minimize Bundy's view that BLM plans to directly threaten his family, private property (other than cattle) or his person. BLM has identified alternative routes to reach most of the collection sites and staging areas which enables us to avoid driving past Bundy's property. This should limit any perceived provocation and cut down on Bundy's ability to remain on his private property yet maintain visual and physical access to BLM vehicles and personnel. The majority of BLM senior LEOs, along with those LEOs most likely to interact with Bundy, his family and any protest leadership, will be in "casual" BLM uniforms vice more overtly tactical ones. The intent is to lower the profile of those LEOs most likely to be in the spotlight and present a less tactical presence in areas where BLM expects a higher concentration of media, protestors and potential instigators.
- b.** BLM is considering beginning impound operations in more remote areas, further away from Bundy's home and the BLM staging areas. This will lessen the likelihood that Bundy and his supporters will encounter a large LEO force right off the bat and make it harder for these individuals to locate and disrupt early operations. At the initial onset of the round-up, BLM leadership will assess the demeanor, size and overall disposition of the Bundys, their supporters and other



groups gathered in the First Amendment zone. If tensions are running too high, BLM leadership may opt to forgo any active round-up operations for the first day or two in order to allow for de-escalation and reassessment. Due to the length of the time allotted for the operation, and the vast area the operation covers, BLM leadership can remain flexible with their operational tempo and halt, cancel or shift any part of the operation to avoid or minimize a potential threat as it surfaces.

- c. One of Bundy’s strategies all along has been to derail the BLM process before any impounding occurred. By seeking legal injunctions, warding off contractors by lobbing legal and economic threats, and issuing veiled threats of violence against BLM, Bundy has tried to thwart impound operations. Thus far, he has been fairly successful and he knows it. In 2012, the operation was cancelled within days of kick-off, which Bundy likely attributes to his own actions. Much of the current operational planning and pre-execution activities mirror the lead-up to the 2012 operation, which was cancelled last minute. As such, Bundy may retain some semblance of hope that the same thing will happen this time around. However, it is important that Bundy realize that impound operations are imminent so he can begin developing a “Plan B,” i.e. how he is going to react and control those around him once operations begin. While this “planning time” presents a double-edged sword for our LEO operations, it may help limit an overly emotional reaction by him and his supporters and provide Bundy time to really weigh his options, identify and organize key players and decide how he wants to handle the possibility of violence. It is in our best interests to face off against a more stable and measured Bundy contingent, vice a caged and reactive one. Bundy received legal notification in early 2014 warning him that he had 45 days to remove his cattle or they would be impounded. In mid-March he also received a signed “Notice of Intent to Impound” from the BLM restating BLM’s intent to impound his cattle. In late February 2014, the Las Vegas Sheriff and a contingent of senior officers informed Bundy face-to-face of the upcoming operation. In mid-March, two BLM Special Agents contacted Bundy and several family members to express the same imminence. The news media has pegged the start date at late March-early April. As such, Bundy is on notice that this is moving forward and must begin facing the possibility that the operation will be executed.

BUNDY FAMILY MEMBERS:

THREAT LEVEL: MODERATE

Bundy has a large extended family to include five sons and a daughter from his first marriage and six daughters and a son from his current marriage to Carol Bundy. Several of his sons have stood with him throughout the various legal proceedings related to the case and publicly espouse similar views to their father regarding the Constitution, States Rights and their plight against the BLM. BLM expects Bundy to rally his sons to his side during this event. Given their involvement over the years, history with law enforcement and their personal political activism, BLM considers them as potential risk to our operation.

A. RYAN BUNDY

THREAT LEVEL: MODERATE/HIGH

Since the mid-1990’s, Ryan has been a staunch supporter of his father’s cause, a vocal proponent of States’ Rights and a local political activist. In 1994, Ryan refused to pay a fee to enter an NPS-controlled area, stating that he did not recognize NPS’ federal authority. When he was approached by local NPS LEOs, he fled, leading the police on a 21-mile pursuit, nearly



crashing into an NPS patrol vehicle. These charges were ultimately dismissed, however, Ryan made it known that he did not respect or recognize the authority of the NPS Rangers. In 2007 he was found guilty of Obstructing an Officer (misdemeanor). He was charged with a concealed weapons violation during the same encounter, but it was dismissed. Video of the incident shows Ryan in an extremely agitated state, refusing to comply with the Cedar City Police Officer who initially pulled him over. The altercation resulted in Ryan becoming physically aggressive with two officers, requiring them to go “hands on” and ultimately gain submission via the threat of a Taser deployment. In 2012 he was found guilty of Wrongful Appropriation (Misdemeanor). Despite his criminal history, Ryan appears to be a productive and active member of his community. He currently owns his own construction business, has a wife and seven kids and made two unsuccessful bids for a State Representative seat in Cedar City, UT. In the lead-up to the 2012 operation, Ryan was interviewed several times by LV detectives. Ryan spent most of the interviews passionately expressing his political views and reasserting his support for his father’s cause. Although he became agitated during discussions about the Sheriff’s lack of active support for Bundy, he appeared generally stable and non-threatening. However, he did state that, “he and his family were not “violent” people, but that they would defend their lives and property.

In March 2014, two BLM Special Agents conducted a telephonic interview with Ryan during which they experienced a more volatile individual. Ryan repeatedly informed the Agents that he and his family “will do whatever it takes,” to stop the gather. During a heated back-and-forth with the Agents, Ryan said, “All we are going to do is defend. We are not offensive people. We are not making any attacks. If you guys attack us, then we have no alternative but to defend ourselves.” When the Agent specified “And by attack you mean take your cows?” Ryan answered, “Is that not an attack enough? If someone showed up at your house and tried to take your property, what would you do?” Unlike Cliven Bundy’s veiled and vague threats, insinuating violence; the Agents felt that Ryan’s threats were significantly more pointed, bordering on criminal (discussions with US Attorney regarding Ryan’s threats are ongoing.) A Confidential Informant reported that in recent months, Ryan stated that his family was “backed into a corner,” and was going to “give a life, or take a life” in defense of their land and cattle from the BLM. Ryan likened himself to the Book of Mormon Prophet Moroni, who defended his land against evil men by going to war.

Given his recent behavior, past and recent comments and his prior criminal history, BLM considers Ryan to be the most volatile threat within the Bundy inner circle. BLM assesses it is likely that Ryan will make his way to Bunkerville at the start of operations. There is a high probability that he will try to either provoke our LEOs into an altercation or initiate an encounter resulting in a physical encounter and/or his arrest or detention.

RISK MITIGATION:

Local police in Cedar City, UT have offered to conduct surveillance on Ryan’s home and his movements in the area in the lead-up to the operation. This may provide some indication as to what his intentions are prior to the operation and provide an early warning if he heads to Nevada. Agents are meeting with the US Attorney’s Office to discuss possible criminal charges or the possibility of issuing an order of protection against him, thus keeping him away from the BLM operation. Ryan is a Utah resident, and due to recent criminal activity he is classified as a restricted person meaning he cannot lawfully carry a concealed weapon in UT or NV. All Officers involved in the operation will be sensitized to Ryan’s background and the likelihood that he will insert himself into this operation.



B. MEL DAHLEN BUNDY

THREAT LEVEL: MODERATE

Although not an outspoken advocate like Ryan, Mel has always stood by his dad and seems to maintain similar political views as his brother and father. In 1999, Mel was found guilty of Resisting Arrest. From 2012 to the present he has been the subject of a BLM Trespass investigation, as he is suspected of squatting on BLM land adjacent to Bundy's private property. At this time, Mel maintains a 5th wheel trailer on this BLM site; however, it is unclear whether he occupies it regularly. Mel is married with three children and appears to be employed full-time, however this is not confirmed. During an interview with LEOs in 2012 regarding this issue, Mel was friendly and appeared fairly measured in his viewpoints; stating that, 'he and his family were raised to be peaceful and not "take up arms" to resolve disputes with the government.' In 2012, David Catoor, a resident of Bunkerville and a BLM contractor associated with this operation, assessed that Mel was the family member that concerned him most. This was based on Mel's relationship with his dad, his close proximity to the Ranch and his personality. Despite a dearth of current information on Mel, he is considered a potential threat given his close personal and physical proximity to the Bundy ranch and his support for his father's efforts.

C. CLIVEN LANCE BUNDY

THREAT LEVEL: MODERATE

Lance's political activism and involvement in his father's affairs have not been recorded or documented as of late. Lance is a concern to BLM because of his criminal history and recorded drug issues. As a result of multiple convictions in 2012, including Burglary, Larceny of a Firearm and Contempt of Court, Lance is currently on supervised Probation through the Nevada Drug Court program. Although Adult Probation and Parole Officers involved in Lance's case believe that he may have had a falling out with his father over money, it is unclear whether a "family crisis" such as this operation would draw him back to Bunkerville to support his father. Given his criminal history, drug issues and possible access to firearms, this makes him a potential threat to BLM's operation.

RISK MITIGATION:

Lance is required to attend drug counseling twice a week. Per his Probation Officer, he has counseling sessions scheduled for April 3rd, 7th and 9th at 6pm in Las Vegas and every Monday/Thursday thereafter throughout the operation. Lance is also scheduled for a face-to-face with his PO on April 3rd at 0900 in Las Vegas. Bundy has a mandatory court appearance on April 8th. If he fails to appear, a bench warrant is immediately issued. APP offered to periodically contact Bundy and his employer via phone to confirm his location and were willing to travel to his place of work and home to further confirm his whereabouts if the need arose. Lance has a suspended driver's license and does not own a car/truck. He travels on a moped and would likely need someone to drive him to Bunkerville. While these actions may not stop Lance from traveling to Bunkerville to assist his family, they do provide some significant obstacles and an early warning mechanism for BLM to monitor his movements. In addition, given his suspended DL, his inability to carry a firearm (Felon) and the strict stipulations of his probation, BLM has several avenues to remove Lance from the fray if he does in fact show up.

D. DAVE BUNDY

THREAT LEVEL: LOW/MODERATE

Although a vocal and staunch supporter of his father and his father's political viewpoints, BLM has no indications that Dave supports or would become involved in any violent activities. He has no prior criminal record and BLM was unable to surface any anecdotal information



regarding prior or current issues with law enforcement. Dave is a business owner, pilot and appears to be a family man. During the 2012 interviews, he stated, “we’re not violent people” and that to avoid confrontation between BLM and the Bundy family, Sheriff Gillespie needed to “uphold our oaths of office” and protect Cliven Bundy’s life, liberty and property.” Mr. Bundy denied he would do anything stupid and would simply “support my dad.” BLM Agents attempted to contact Dave in March 2014 for a follow-up interview but he refused to return their calls and BLM was unable to locate his current residence. Given his prior support for his dad, it is highly possible Dave will travel from Utah to Bunkerville during the operation and/or serve as Bundy’s media spokesman.

E. AMMON BUNDY **THREAT LEVEL: LOW**

In 1998, Ammon was charged with Resisting Arrest and Obstructing an Officer but has no recent criminal history. Presently, Ammon and his family live in Arizona, where he owns a seemingly profitable trucking business. During the 2012 interviews, his political rhetoric mirrored those of his father and brothers’ however; he did not make any threat, veiled or otherwise regarding his family’s response to a perceived government threat. He stated that, “he will do whatever his father tells him to do when the BLM operation begins.” Ammon has not been contacted since this interview; therefore, it is unknown whether he would travel to Nevada at the onset of an operation and what his involvement would entail.

F. OTHER INNER CIRCLE MEMBERS **THREAT LEVEL: LOW/MODERATE**

During the 2012 threat assessment process, analysts identified Corey Houston (Bundy’s nephew) and Doug Duran Bundy (Bundy’s brother) as two potential supporters of concern. Based on social media analysis, both men remain in contact with Bundy’s immediate family; however, there is limited information regarding their stance on Bundy’s fight with BLM. In 2012, Houston adamantly defended Bundy’s actions and railed on the BLM’s “harassment” of him and his family. Houston, who is employed by the Clark County Fire Department and often opens carries a Glock pistol, assessed that the locals would protest non-violently on behalf of Bundy, but would be prepared to amp things up in response to BLM’s actions. Doug Bundy was not interviewed by the assessment teams nor is there much information available on social media regarding his political leanings or current activities. In 2012, Doug was identified during an interview of another family member as being “someone to look out for.” Between 1992 and 2008, Doug was charged with several DUIs, a concealed weapons misdemeanor and Battery. Given Bundy’s extensive family tree, it is hard to say who else may join up with him to support his efforts during the operation. Social media analysis identified several extended family members with similar political views as Bundy, and a few who reposted articles related to Bundy’s cause. However, with our limited information it is difficult to assess if any of these individuals will actively join Bundy in any anti-BLM activity during the operation. While several of Bundy’s daughters appear to support their father’s cause and maintain similar political views, BLM has seen no active participation on their parts. Previous threat assessments identified Duane Magoon (DOB: 6/30/62) and Shem Teerlink (DOB: 8/18/65) as close associates and supporters of Bundy. Neither has a criminal record nor presents any immediate concern, however, they may join Bundy in his efforts.

RISK MITIGATION:

BLM Agents have established various mechanisms to monitor social media sites and other online outlets in an attempt to identify any unknown players within Bundy’s inner circle who may pose a threat to our operation. If a new person is identified, Agents will immediately



begin to analyze their activities and develop plans to mitigate the risks the pose. This online monitoring also provides a mechanism for BLM to monitor the “pulse” of several members of Bundy’s inner circle and their immediate family members, which may enable Officers to get ahead of a major crisis before it implodes.

RISK FACTOR #2

Local Protestors / Sagebrush Rebellion Activity

THREAT LEVEL: MODERATE

When this issue first arose in the 1990s, Bundy was actively supported by the various States’-Rights movements, many of whom aligned with the Sagebrush Rebellion movement. These groups with Sovereign Citizen philosophies supported anti-federal stands and claimed that the federal government did not have jurisdiction over federal lands or the people on them. Bundy was actively supported by a group known as the County Alliance to Restore the Economy and Environment (“CAREE”). In a Washington Times article dated March 19, 1994, a CAREE representative stated, “...Mr. Bundy and other southern Nevada ranchers are preparing for the BLM’s arrival at his ranch... if agents arrive. The plan is to make a show of civil disobedience by blocking cow pens and other entrances, preferably under the unblinking gaze of the television cameras.”

While CAREE appears to be defunct, similar groups have likely taken its place. Over the last few years, Bundy has focused on exploiting social media and the internet to get his message out to a broader community. He can be seen on YouTube and other websites giving guest lectures to spirited audiences of Constitutionals, Independent Cattlemen and States Rights activists. As such, he has broadened his support base and garnered the approval of a myriad of political groups nationwide. While it is unclear how many of these groups and individual supporters will actually move past verbal support and into active protest, there is a high probability that this operation will generate a reasonable crowd of protestors. It is common for BLM to get protest groups when it performs any gathers/impoundments. These groups include animal rights groups, ranchers rights groups, Native American rights groups, etc. These groups have made appearances at impounds under similar circumstances such as the Dann sisters impound in northern Nevada. As such, BLM must plan for that contingency at the Bunkerville gather as well. These protests are usually non-violent, but BLM must be prepared to manage these types of groups no matter what level of resistance they use. In addition, BLM assesses that there is a possibility that Bundy supporters may resort to “Sagebrush Rebellion-style” tactics to thwart our operations. This would include freeing cows from pens, sabotaging equipment and vehicles, interrupting convoys by blocking roads, hindering freedom of movement and interfering with gather operations.

Online monitoring has yet to see a “rally cry” from any of these sympathetic groups; however, word is only just getting out regarding the timing of the operation. It is possible that over the next few weeks, groups will begin to plan organized events in support of Bundy. In mid-March 2014, BLM received information indicating that a group of Bundy supporters from Piute County, UT planned to travel to Nevada and block local roads leading to various collection sites, thus hindering operations. This same group may be planning to obstruct operations at the auction site, either through active protests or by hindering the movement of the cattle into the auction area.

While these groups may start off as non-violent, given the volatility of the situation, the emotionally charged environment created by Bundy and his sons and the likely presence of personal firearms, the situation could devolve quickly. Bundy and his sons seem to be waiting for BLM to “cross the line” in



order to respond back with some level of violence. An “overzealous” response by LEOs to a seemingly non-violent action could provide the perfect springboard for Bundy and his supporters to take things to the next level.

RISK MITIGATION: (Please see above “Risk Mitigation- Tactical” for additional information)

The demographics in the area have changed significantly over the past 15 years. There are far fewer ranchers and the local community appears to be growing tired of the nuisance that Bundy’s cattle pose. A September 29, 2011 article in the Mesquite Citizen Journal entitled, “Tragedy Strikes Heritage Gardens,” detailed how Bundy’s cattle had destroyed the non-profit organization’s fund-raising garden. There have been several other documented incidents where Bundy’s cattle have gotten onto golf courses and other city areas, causing damage and scaring local citizens. As such, Bundy may not garner as much local support as he hopes, forcing him to rely on non-local groups to provide the “masses” he claims he can bring to bear. However, these groups will have to travel into town and be willing to remain onsite at their own personal expense, which may limit their numbers.

In the event of a blockade by a protest group, BLM has secured a heavy equipment mover which will be on site at the ICP and has contracted for a heavy tow truck which will be available as needed. BLM has established an SOP for an involuntary vehicle removal operation, which will be briefed to the LEOs prior to execution

RISK FACTOR #3

(External Threat)

Violent Extremists (Groups / Lone Wolf)

THREAT LEVEL: LOW

To date, BLM has not identified any links between Bundy or any of his close contacts to violent, anti-government, anti-law enforcement extremist groups. At this time, there is no intelligence available indicating that any of the groups are aware of this operation or specifically interested in Bundy’s cause. However, Bundy’s rhetoric and the nature of his argument against BLM may resonate with a violent Sovereign Citizen-esque organization. As such, there is a remote possibility that a violent, anti-government group or a similarly inclined “lone wolf” could become motivated by Bundy’s story and insert themselves into the fray without Bundy’s involvement or knowledge. Given that the operation involves dozens of federal agents operating in small groups in remote areas over the course of several weeks, LEO teams may present an attractive target for an organized, armed group looking to kill a federal agent.

RISK MITIGATION: (Please see above “Risk Mitigation- Tactical” for additional information)

BLM, FBI and local LEOs will continue to monitor incoming intelligence and tap into local sources as available. BLM will maintain an open line of communication to the LVMPD and the State Fusion cell to monitor any new intelligence as the operation unfolds. BLM has coordinated with both LVMPD and FBI SWAT teams to provide assistance if a violent encounter should occur or one is forecasted. FBI SWAT also included a helicopter response team in their package and an MRAP vehicle. USPP SETT will be present at the “First Amendment” site to respond to any issues in that area of the operation and to provide additional critical response anywhere within the AOR.