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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

<p>MARK R. BARNHOUSE,</p> <p>Plaintiff,</p> <p>v.</p> <p>JOHANN SCHMITZ, individually and in his official capacity as a police officer, MARK KNAPP, individually and in his official capacity as a police officer, JONATHAN. HERNAS, individually and in his official capacity as a police officer, RON H. CLARK, CITY OF COEUR D' ALENE, a municipality incorporated in the State of Idaho, and JOHN DOE(S) I-V,</p> <p>Defendants.</p>	<p>Case No. 2:14-cv-129</p> <p>COMPLAINT AND DEMAND FOR JURY TRIAL</p>
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PLAINTIFF Mark R. Barnhouse, through his attorney Jefferson R. Griffeth, and for cause of action against the above defendants, alleges as follows:

JURISDICTION AND PARTIES

1. This is an action for money damages and declaratory relief that arises under 42 U.S.C. § 1983 and the First, Fourth, Eighth, Ninth, and Fourteenth Amendments to the United States Constitution, and under the common law of the State of Idaho and Idaho Tort Claims Act, Title 6, Chapter 9, Idaho Code challenging the actions of several police officers, both as individuals and in their official capacities, and officials of the City of Coeur d'Alene, in the State of Idaho.

2. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. §§ 1343(a)(3) and 1343(a)(4), which confer original jurisdiction in suits to redress the deprivation, under color of state law, of constitutional rights, civil rights, and other rights, privileges, and immunities. Additionally, 28 U.S.C. § 1367(a) confers supplemental jurisdiction on this court to hear Plaintiff's claims arising under the common law of the State of Idaho and Idaho Tort Claims Act because these claims are sufficiently related to claims in this action within this Court's original jurisdiction that the form part of the same case and controversy under Article III of the United States Constitution.

3. Venue of this action is proper under 28 U.S.C. § 1391(b) because all of the events, actions, and omissions occurred in the judicial district of Idaho.

4. That the Defendant officers unlawfully arrested, seized, assaulted, battered, used excessive and unreasonable force against Mark Barnhouse, violating his rights under the First, Fourth, Eighth, and Ninth Amendment and the Due Process Clause of the Fourteenth Amendment to the United States Constitution. That all violations of Plaintiff's Constitutional rights are incorporated to the State of Idaho through the Fourteenth Amendment.

5. That Defendant officers, at the times relevant to the alleged incident, were acting under the color of the statutes, regulations, ordinances, policies, procedures, customs, and usages of the City of Coeur d' Alene, and the State of Idaho.

6. That the statutes, regulations, ordinances, policies, procedures customs, and usages of the City of Coeur d' Alene and the County of Kootenai proximately caused the alleged acts and omissions giving rise the deprivation of Plaintiff's rights under the United States Constitution and Idaho common law.

7. Plaintiff Mark R. Barnhouse, is a resident of Athol, Kootenai County, Idaho.

8. Defendants Johann Schmitz, Mark Knapp, Jonathan Hernas, and John Does I through V were at all times relevant to this complaint duly appointed and acting officers of the City of Coeur d' Alene police department.

9. Defendant Ron Clark was, at all times relevant to this matter, the Chief of Police for the City of Coeur d' Alene and, together with John Does I through V, was responsible for the proper training, supervision, and control of defendants Johann Schmitz, Mark Knapp, Jonathan Hernas, in the proper

use of force, and for the proper investigation of all uses of force by such officers.

10. Defendant Mark Knapp was also responsible for the proper training, supervision, and control of defendant Johann Schmitz in the proper use of force.

11. The Defendant, City of Coeur d' Alene, is a municipal corporation within the state of Idaho.

12. Plaintiff does not know the true names or capacities of the Defendants named herein as John Does I through V and prays leave to amend this complaint to substitute their names herein when their identities are ascertained. John Does I through V are all officers with the Coeur d' Alene police department.

13. All defendants have been and was properly served with a tort claim notice in accordance with Title 6, Chapter 9, Idaho Code.

STATEMENT OF FACTS AND ALLEGATIONS

14. On February 17, 2013, Plaintiff Mark Barnhouse was riding in the passenger seat of a vehicle driven by his wife Lisa Barnhouse.

15. Officer Johann Schmitz conducted a routine traffic stop based on his stated belief that the driver failed to use her turn signal when turning North onto 4th St. from a parking lot in Coeur d' Alene, Idaho.

16. At this time Officer Mark Knapp situated himself at the passenger side of the vehicle unbeknownst to the Plaintiff.

17. Officer Schmitz, standing along the driver's side door to talk to the driver, noticed the Plaintiff drinking from a glass bottle and asked the Plaintiff what he was drinking.

18. The Plaintiff identified the glass bottle as having root beer.
19. Officer Schmitz asked the Plaintiff to verify it was root beer by turning the bottle and showing him the label.
20. Seeing that the Plaintiff was in fact holding a root beer bottle, and satisfied with that fact he stated, "Great. All right."
21. Officer Schmitz then asked the Plaintiff for his identification, asking why he didn't have his seat belt on.
22. The Plaintiff replied that he "forgot to put it on."
23. The Plaintiff then asked whether he had to give his identification, to which Officer Schmitz replied in the affirmative because the Plaintiff was not wearing his seat belt.
24. The Plaintiff sighed, then casually opened the passenger side door and stepped out with the bottle in hand in a normal carrying grip, to retrieve his identification from his rear pocket.
25. Officer Knapp, surprising the Plaintiff, pushed him in the chest back against his vehicle and ordered the Plaintiff to put the bottle down.
26. As the Plaintiff opened the door, Officer Schmitz calmly stated, "Easy, easy, easy." then moved to the passenger side of the vehicle without a sense of urgency.
27. The Plaintiff complied with Officer Knapp's order to place the bottle down, placing it inside the vehicle.
28. While the Plaintiff was complying Officer Knapp rapidly and aggressively continuously ordered the Plaintiff to put the bottle down.
29. After placing the bottle down, the Plaintiff stated, "Criminey, what a bunch of dickheads."

30. Despite the Plaintiff's compliance, after a moment's pause on the part of Officer Knapp, he decided this slight was sufficient reason to pull the Plaintiff away from the open door and shove him against the vehicle.

31. Officer Knapp, with the help of Officer Schmitz, then began to handcuff the Plaintiff, informing him that he was under arrest for open container, despite Officer Schmitz acknowledging that the Plaintiff had only a bottle of root beer.

32. Plaintiff was then thrown on the ground by both officers, and handcuffed.

33. Plaintiff never attempted to flee, attack, or threaten Defendants prior to his arrest, objectively establishing that Plaintiff posed no imminent risk to the Defendant officers.

34. Plaintiff did not resist or obstruct the officers' duties except to a degree necessary to prevent himself from suffering excessive damage from the concrete.

35. Plaintiff informed the officers while on the ground that his "shoulder was fucked up" while being handcuffed.

36. While taking the Plaintiff to the vehicle for transport to jail, Officer Doe lifted the Plaintiff's hands while handcuffed, using them as a lever to cause his shoulder unnecessary pain despite his compliance in moving to the vehicle.

37. As a direct and proximate result of the Defendants alleged acts and omissions alleged above, Plaintiff suffered the following injuries and damages.

- a. Violation of his constitutional rights under the First, Fourth, Eighth, Ninth, and Fourteenth Amendments to the Constitution of the United States;
- b. Loss of physical liberty without due process of law; and
- c. The necessity of employing an attorney to defend himself from fabricated and unjustifiable charges of Resisting and Obstructing an Officer, Idaho Code § 18-705; and
- d. Unnecessary physical pain; and
- e. The expense of a bond forfeiture in order to dismiss the charges; and
- f. The expense of having to hire an attorney to defend his constitutional rights in this Court.

38. In an attempt to justify the officers' illegal, repressive, and unjustifiable acts, Plaintiff was arrested, booked, and charged with Resisting and Obstructing an Officer, Idaho Code § 18-705. The charges against the Plaintiff were dismissed following a bond forfeiture because he was not guilty of the charge against him.

39. In furtherance of their attempts to justify their unlawful arrest, both Officers Schmitz and Knapp made false statements of fact in their police report in order to prejudice and undermine the Plaintiff, making him appear combative and noncompliant. Some of those statements are as follows:

- a. Officer Schmitz stated that the Plaintiff said, "because I didn't feel like it." in response to the officer's inquiry as to why he was not wearing his seat belt. In reality, the Plaintiff stated that he "forgot to put it on."
- b. Officer Knapp exaggerated and fabricated assertions of noncompliance then stating that the Plaintiff "started reaching for something

towards the passenger side floor board". In fact, the Plaintiff was complying and following Officer Knapp's orders to put the bottle down.

40. The Officers then decided to modify and correct their false statements only after reviewing Officer Schmitz's body camera.

41. Plaintiff was never cited for not wearing a seat belt.

42. The above acts of Officers Knapp and Schmitz, constituted excessive force, an unreasonable seizure of Plaintiff, unlawful arrest, and false imprisonment, performed with deliberate indifference to Plaintiff's clearly established rights under the First, Fourth, Ninth, and Fourteenth Amendments to the United States Constitution.

43. At all times during the incident, the officers assisted and acted in concert with each other by lending their physical presence, support, and the authority of their respective offices to one another, and acquiesced in each others' excessive use of force and otherwise unlawful behavior.

44. Officer Schmitz allowed the Plaintiff to be arrested for a charge he knew the Plaintiff to be innocent of, possession of an open container, and either through cowardice or lack of regard for his duty to the Plaintiff failed to inform or stop Officer Knapp from informing the Plaintiff that he was arresting him under that charge.

45. Defendants' intentional omissions to act despite a clearly established duty to do so, demonstrate a single objective, the essential nature and scope of which was to act in concert with each other, in furtherance of their plan to deprive Plaintiff of his constitutional rights.

46. At minimum, Defendants' intentional omissions to act despite their duty to do so, along with falsifying and embellishing statements in their police report served as an attempt to prevent discipline for their behavior and

redress for the Plaintiff, even at the possible expense of the Plaintiff being charged with a serious crime.

47. At all relevant times during the incident alleged above, defendants Ron H. Clark, and the City of Coeur d' Alene, failed to adequately train, supervise, and/or control each other and the other officers' use of force in such situations, acquiesced in the deprivation of Plaintiff's constitutional rights, set in motion a series of acts which they knew or reasonably should have known would cause the others to inflict constitutional injuries on Plaintiff, and otherwise showed callous indifference to Plaintiff's clearly established rights, rendering them liable for such injuries.

48. It was the policy and/or custom of the City of Coeur d' Alene to inadequately supervise, train, or control its officers regarding the proper use of force, and to attempt to dissuade victims of its officers' unlawful behavior from taking legal action against them by serving knowingly baseless criminal citations upon such victims.

49. As a direct and proximate result of the policies and/or customs described above and City of Coeur d' Alene officers, including Defendant officers, believed their actions would not be properly monitored by supervisory officers nor would their conduct be investigated or sanctioned.

50. It was the policy and/or custom of the City of Coeur d' Alene to inadequately and improperly investigate complaints of its officers' negligence and deliberate indifference to constitutional rights and these acts and omissions were instead tolerated by the City of Coeur d' Alene.

51. All acts and omissions of the defendants were conducted under the color and pretense of the statutes, ordinances, regulations, policies, customs and usages of the City of Coeur d' Alene, and the State of Idaho.

52. Defendants' acts and omissions alleged above constitute knowing violations of clearly established and well-settled Constitutional rights under the First, Fourth, Ninth, and Fourteenth Amendments of the Constitution of the United States.

53. No reasonable police officer could reasonably, though erroneously, believe that the Defendants' decision to arrest the Plaintiff do not violate Plaintiff's clearly established constitutional rights. Plaintiff was arrested for hurting Officer Knapp's feelings, when he said that they were acting, "like a bunch of dickheads."

54. Defendants' acts and omissions alleged above proximately caused Plaintiff irreparable harm and demonstrates the Defendants' malicious, intentional, and knowing violation of clearly established Constitutional Rights.

55. Plaintiff did not expressly or impliedly consent to the aforesaid defendants' physical contact.

56. As a direct and proximate result of the defendants deprivations of Plaintiff's clearly established constitutional rights, Plaintiff suffered the injuries described above.

57. Defendants' conduct as alleged above and to be proven at trial was motivated by evil motive or intent, and/or exhibited reckless or callous indifference to Plaintiff's constitutionally protected rights, and Plaintiff is therefore entitled to an award of punitive damages for the same.

58. Defendants' acts and omissions as alleged above constitute extreme deviations from reasonable standards of conduct, and Plaintiff reserves the right to seek leave to amend this complaint to add a prayer for

punitive damages for violation of his rights under Idaho law, pursuant to Idaho Code § 6-1604(2).

59. Plaintiff is entitled to an award of their attorney fees and costs pursuant to 42 U.S.C. § 1988.

60. Portions of Plaintiff's damages are liquidated as to the amount, and plaintiff is entitled to interest on damages at the maximum rate allowed by law and applicable statutes.

**FIRST CAUSE OF ACTION - 42 U.S.C. § 1983
AGAINST OFFICERS IN THEIR INDIVIDUAL CAPACITY
*EXCESSIVE FORCE***

61. Paragraphs 1 through 60 of this complaint are incorporated by reference as though pleaded in full.

62. Defendants, Officer Knapp, Officer Schmitz, and Officers Doe I-V, whose actions were taken under the color of state law, are liable for the unconstitutional use of excessive force against the Plaintiff.

63. Plaintiff fully cooperated with Defendants before, during, and after the arrest and search conducted without probable cause.

64. Plaintiff never attempted to flee, resist, attack, or threaten Defendants despite statements alleging otherwise by the Defendants in their affidavits, objectively establishing that Plaintiff posed no imminent risk to the Defendants, thereby not justifying the use of handcuffs or arrest in the name of officer safety.

65. Plaintiff posed neither an objective nor a subjective risk to Defendants. All actions were taken because Officer Knapp had his feelings

hurt. This resulted in Plaintiff being violently taken to the ground, causing minor injuries, but risking more.

66. Defendants' seizure of Plaintiff through their application of unnecessary and excessive force was objectively unreasonable under the circumstances.

67. Defendants' use of force constitutes a knowing violation of clearly established Constitutional rights under the First and Fourth Amendments of the Constitution of the United States of America.

68. No reasonable officer could reasonably, though erroneously, believe Defendants' use of force was an acceptable response to Plaintiff's statement that they were acting like "a bunch of dickheads".

69. No reasonable officer could reasonably, through erroneously, believe Defendants' use of force was necessary in light of Plaintiff's cooperation with the officers.

70. A reasonable police officer would have known the force used by Defendants' was excessive and unreasonable, especially in light of the demand for identification over something as minor as a seat belt violation.

71. The nature and quality of intrusion on the Plaintiff's First and Fourth Amendment rights by Defendants Officers' use of force significantly exceeded the government's countervailing interest at stake.

72. Exercising one's First Amendment rights, especially while cooperating with Officer Knapp's orders is not a government interest justifying Defendant Officers acting under the protection and color of law, to use violence against a citizen in order to take him to the ground causing him minor injuries and a risk of significant injury.

73. Defendants' use of excessive force proximately caused Plaintiff irreparable harm, and demonstrates the Defendants' malicious, intentional, and knowing violation of clearly established Constitutional Rights, precluding their use of any defense of qualified immunity.

**SECOND CAUSE OF ACTION – 42 U.S.C. § 1983
AGAINST OFFICERS IN THEIR INDIVIDUAL CAPACITY
*UNLAWFUL ARREST***

74. Paragraphs 1 through 60 of this complaint are incorporated by reference as though pleaded in full.

75. Defendants, Officers Knapp, Schmitz, and Officers Doe I-V are liable for the unconstitutional arrest of Plaintiff.

76. Defendants' arrest of Plaintiff violated Plaintiff's constitutional right to be free from unreasonable search and seizure under the Fourth Amendment of the Constitution of the United States of America.

77. Defendants' arrest of Plaintiff was an arbitrary, punitive, and unjustified deprivation of Plaintiff's First Amendment rights under the Fourth Amendment of the United States Constitution.

78. Defendants' arrest was an unjustified deprivation of Plaintiff's personal liberty under the Due Process Clause of the Fourteenth Amendment.

79. Plaintiff had not committed, was not engaged in, had not attempted, nor was fleeing or attempting to flee from the commission of any offense justifying an arrest.

80. The facts and circumstances within the Defendants' knowledge at the time of Plaintiff's arrest were not sufficient probable cause to warrant an arrest.

81. Plaintiff was arrested for a statement made that Officer Knapp found personally offensive, making the arrest punitive in nature.

82. Despite a dearth of probable cause, Defendants violently took Plaintiff to the ground, causing minor injuries and risking major injury.

83. Defendants made this decision despite Plaintiff's cooperation with Officer Knapp's orders.

84. Defendants then restrained Plaintiff with handcuffs and initiated an arrest.

85. Defendants informed that Plaintiff was under arrest for an offense the officers knew Plaintiff to be innocent of – open container.

86. Defendants' conduct, while acting under the protection and color of state law was personal and punitive in nature and demonstrates a malicious criminal intent and absolute lack of professionalism and good faith.

87. The nature and quality of intrusion on the Plaintiff's First and Fourth Amendment rights by Defendants Officers' unlawful arrest significantly exceeded the government's countervailing interest at stake.

88. Exercising one's First Amendment rights, especially while cooperating with Officer Knapp's orders is not a government interest justifying Defendant Officers acting under the protection and color of law, to deprive a citizen of his freedom.

89. Defendants' unlawful arrest proximately caused Plaintiff irreparable harm, and demonstrates the Defendants' malicious, intentional,

and knowing violation of clearly established Constitutional Rights, precluding their use of any defense of qualified immunity.

**THIRD CAUSE OF ACTION – 42 U.S.C. § 1983
AGAINST OFFICERS IN THEIR INDIVIDUAL CAPACITY
*FALSE IMPRISONMENT***

90. Paragraphs 1 through 60 of this complaint are incorporated by reference as though pleaded in full.

91. Plaintiff alleges Defendant officers Knapp, Schmitz, and Doe I-V are liable for the false imprisonment of Plaintiff, violating his constitutional rights under the First, Fourth and Fourteenth Amendments of the United States Constitution.

92. Defendant officers intentionally, punitively, and maliciously confined Plaintiff depriving him of his liberty by handcuffing and violently taking Plaintiff to the ground, eventually resulting in his arrest.

93. Although Plaintiff cooperated with Officer Knapp's orders to put down the bottle, Plaintiff had his freedom taken from him to punish him for his choice of words.

94. Defendant officers had neither the right, privilege, nor need to confine Plaintiff by any means whatsoever.

95. Plaintiff's confinement was complete, and no reasonable means of escape were available to Plaintiff.

96. Defendant Officers' intentional confinement, and the punitive nature of such confinement demonstrates a lack of good faith, along with a malicious and criminal intent while acting under the protection and color of law, thereby precluding any immunity defense.

**FOURTH CAUSE OF ACTION - 42 U.S.C. § 1983
AGAINST OFFICERS IN THEIR INDIVIDUAL CAPACITY
*CONSPIRACY TO VIOLATE CIVIL RIGHTS***

97. Paragraphs 1 through 60 of this complaint are incorporated by reference as though pleaded in full.

98. Defendant Officers Knapp, Schmitz, and Does I-V are liable for conspiracy to violate Plaintiff's constitutional rights under the First, Fourth, and Fourteenth Amendments of the United States Constitution.

99. Officer Schmitz witnessed and participated in the arrest, confinement, and use of excessive force against Plaintiff, despite his actual knowledge that Plaintiff did not have an open alcoholic container.

100. Officer Schmitz witnessed and participated in the arrest, confinement, and use of excessive force against Plaintiff despite the fact that a reasonable officer would know that Plaintiff was complying with orders to produce identification.

101. Officer Schmitz failed, either through cowardice in the face of correcting his training officer, or in a desire to make an arrest, to inform Officer Knapp that Plaintiff did not have an open container.

102. Officer Knapp witnessed and participated in the confinement, arrest, and use of excessive force against Plaintiff despite the fact that he could clearly see that Plaintiff did not have an open container.

103. Officer Knapp witnessed, participated in, and initiated the arrest, confinement, and use of excessive force against Plaintiff based solely upon a desire to punish Plaintiff for his choice of words while complying with him, demonstrating malice and criminal intent on the part of Officer Knapp.

104. Officer Knapp witnessed, participated in, and initiated the arrest, confinement, and use of excessive force against Plaintiff for Plaintiff's failure to demonstrate gratitude, or at least apathy, for the unnecessary use of force and verbal aggression by Officer Knapp when Plaintiff exited his vehicle to retrieve his identification as ordered by Officer Schmitz.

105. Defendant Officers both witnessed each other's unlawful behavior and made no attempts to correct each other.

106. All Defendants at the scene, by failing to prevent the unlawful arrest, false imprisonment, and use of excessive force against Plaintiff, deprived Plaintiff of his constitutional rights.

107. Defendants' intentional failure to act to fully inform or correct each other demonstrated a single objective, in concert with each other, in furtherance of their plan to deprive Plaintiff of his constitutional rights.

108. Defendants' conspiracy to deprive Plaintiff of his rights under the First, Fourth, Eighth, and Fourteenth Amendments of the Constitution of the United States of America caused the actual deprivation of Plaintiff's rights.

**FIFTH CAUSE OF ACTION - 42 U.S.C. § 1983
AGAINST CITY OF COEUR D' ALENE, IDAHO
*EXCESSIVE FORCE, UNLAWFUL ARREST, FALSE IMPRISONMENT,
& CONSPIRACY TO VIOLATE CIVIL RIGHTS***

109. Paragraphs 1 through 60 of this complaint are incorporated by reference as though pleaded in full.

110. Prior to February 13, 2013, the City of Coeur d' Alene developed and maintained policies or customs exhibiting deliberate indifference to the Constitutional rights of citizens within it's jurisdiction, such that caused the violation of Plaintiff's clearly established constitutional rights.

111. It was the policy and/or custom of the City of Coeur d' Alene to inadequately supervise and train its police officers, including Defendant Officers, resulting in a failure to discourage and prevent constitutional violations on the part of its police officers.

112. It was the policy and/or custom of the City of Coeur d' Alene to inadequately supervise and train its police officers, including Officer Schmitz, as evidenced by the fact that the above violations were initiated by Officer Schmitz's training officer, Officer Knapp.

113. As an actual and proximate result of the policies and/or customs of the City of Coeur d' Alene, Idaho police officers, including Defendant Officers, those officers could reasonably believe that their misconduct would not be adequately monitored, noted, sanctioned, or punished.

114. Indeed, by having violations of constitutional rights initiated by training officers in the presence of junior officers, such violations are not only tolerated, but encouraged and taught to junior officers.

115. The policies and/or customs of the City of Coeur d' Alene demonstrates a deliberate or at minimum reckless indifference by the City of Coeur d' Alene to the constitutional rights of citizens within its power and control.

116. This deliberate or reckless indifference was a proximate cause of those violations of Plaintiff's clearly established constitutional rights.

117. Defendants' conduct demonstrates at worst malicious, and at minimum reckless and grossly negligent criminal intent to violate or ignore the established constitutional rights of citizens, precluding any immunity defense under Idaho Code § 6-904(3).

PRAYER FOR RELIEF

FOR THE ABOVE REASONS, Plaintiff prays for the following judgment and relief against the defendants:

1. For a Judgment against defendants Johann Schmitz, Mark Knapp, Ron Clark, and the City of Coeur d' Alene, declaring that the defendants violated Plaintiff's clearly established rights under the First, Fourth, Ninth, and Fourteenth Amendments to the United States Constitution.
2. For a Judgment against the defendants for the nominal, general, and special damages suffered and incurred by Mark Barnhouse in an amount of \$100,000 (one-hundred thousand dollars).
3. For Judgment against the defendants for punitive damages because of defendants' reckless or callous indifference to Plaintiff's constitutionally protected rights in an amount to be proven at trial.
4. For an award of Plaintiff's reasonable attorneys fees incurred herein, pursuant to 42 U.S.C. § 1988.
5. For such costs incurred in prosecuting this action.
6. For such and further relief as this Court deems equitable and just.

7. For a trial by jury.

DATED this 31st day of March, 2014.

BAMCIS Legal PLLC


Jefferson R. Griffeth, ISB# 9022

VERIFICATION

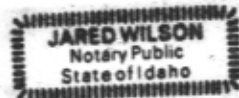
STATE OF IDAHO)
) ss.
County of Kootenai)


I, Mark R. Barnhouse, being first duly sworn on oath, depose and say:

That I am the plaintiff in the above-entitled action; that I have read the above Complaint, know its contents and believe them to be true.


Mark R. Barnhouse, Plaintiff

SWORN AND SUBSCRIBED to before me on this 12 day of March, 2014.




NOTARY PUBLIC in and for
The State of Idaho
Residing at Kootenai
My Commission expires 9-6-19