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**IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR  
SALT LAKE COUNTY, STATE OF UTAH**

IN THE MATTER OF THE UNITED EFFORT  
PLAN TRUST Dated November 9, 1942,  
Amended April 10, 1946, and Amended and  
Restated on November 3, 1998; and its  
TRUSTEES, including known trustees  
TRUMAN BARLOW, WARREN JEFFS,  
LEROY JEFFS, WINSTON BLACKMORE,  
JAMES ZITTING and WILLIAM E. JESSOP  
a/k/a WILLIAM E. TIMPSON DOE  
TRUSTEES I THROUGH IX.

**SUPPLEMENT TO EMERGENCY  
REPORT OF THE ARIZONA ATTORNEY  
GENERAL'S OFFICE**

**AND**

**RECOMMENDATION FOR EXPEDITED  
STATUS CONFERENCE**

Civil No. 053900848

Judge Denise P. Lindberg

The Office of the Arizona Attorney General (“Arizona AG”) files the following Supplement to its Emergency Report lodged with the Court on July 8, 2010 concerning the administration of the United Effort Plan Trust (the “Trust”) and again suggests the Court set a status conference to hear of events and conditions involving administration of the Trust.

After filing its Emergency Report, the Arizona AG was made aware that Lyle Jeffs, in his capacity as Bishop of the Fundamentalist Church of Jesus Christ of Latter-Day Saints, requested and received a Temporary Restraining Order against Shane and David Stubbs prohibiting them from placing anything whatsoever in or about the granaries located on Trust property at 1100 North Carling Street, Hildale, Utah. [See Memorandum in Support of Motion for Temporary Restraining Order and Preliminary Injunction, attached hereto as Exh. 1, Affidavit of Chad Johnson, attached hereto as Exh. 2, and July 14, 2010 Temporary Restraining Order issued by Honorable Judge James L. Shumate attached hereto as Exh. 3].<sup>1</sup>

Shane and David Stubbs maintain that they have a lease with the Court’s Fiduciary to use and store grain in the granaries located on that Trust property. [See Letter dated July 14, 2010 attached hereto as Exh.4, Letter to Honorable Judge Shumate signed by Shane Stubbs on July 16, 2010 attached hereto as Exh. 5]. Despite the lease with the Court’s Fiduciary, the Washington County Court found that the Stubbs “by virtue of the possession and attempted exercise of this lease which purports to eliminate the ability of the Bishop to discharge his religious duties, infringe the free exercise of religion guaranteed by the Constitution of the United State of America in a manner inconsistent with the public interest.” [Exhibit 3, p. 2, ¶3]. The Washington County Court further found that should the Stubbs “not be restrained from coming onto the vicinity of the Bishop’s storehouse and the Bishop’s residence in Hildale, Utah continued verbal and physical alterations have a likely [sic] of ensuing which may escalate causing a disturbance of the peace and irreparable injury and harm to the plaintiffs and others.” [Id at p.2, ¶ 1].

Shane Stubbs alleges in a hand written letter dated July 14, 2010 that “the FLDS took my wheat out of the grainaries [sic] in Hildale [sic] Utah and hauled it across the State line in to

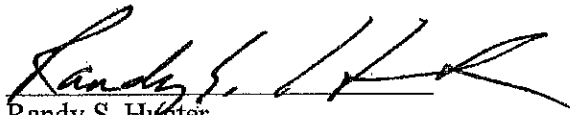
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<sup>1</sup> The Washington County Court has set a July 27, 2010 evidentiary hearing on the matter.

[sic] Arizona and the local officers would not stop them [sic] at this time the wheat is setting on the ground as we speak and I am the only one that currently has a lease on the granaries at this time" [sic] [Exh. 4]. Also, in a July 16, 2010 letter to the Honorable Judge Shumate, Mr. Stubbs wrote "as we speak, several tons of our grain were [sic] taken out of the silo and dump station and bagged by the FLDS. They then left our wheat sitting on the ground in gunny sacks, some in the middle of the road right by the entrance of the grain silos, some on the ground by the side of the road by the Zoo, and some down the creek." [Exh. 5].

Given the allegations on both sides involving the administration and occupation of the granaries on Trust property, the Arizona AG thought it appropriate to bring this incident, along with others, to the attention of the Court. In light of the incidents discussed herein and in the Emergency Report of the Arizona Attorney General's Office, the Arizona AG respectfully requests for the Court to consider convening a status conference on or after July 27, 2010 to hear more about these issues.

Respectfully submitted this 19th day of July, 2009.



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## CERTIFICATE OF SERVICE

I hereby certify that on the 19<sup>th</sup> day of July, 2010, a courtesy copy of the SUPPLEMENT TO EMERGENCY REPORT OF THE ARIZONA ATTORNEY GENERAL'S OFFICE with exhibits was be hand-delivered to Judge Denise Lindberg's chambers.

I hereby certify that on the 19th day of July, 2010, I caused a copy of the SUPPLEMENT TO EMERGENCY REPORT OF THE ARIZONA ATTORNEY GENERAL'S OFFICE with exhibits to be mailed via U.S. Mail to the following, and a copy of the SUPPLEMENT TO EMERGENCY REPORT OF THE ARIZONA ATTORNEY GENERAL'S OFFICE with exhibits to be sent via electronic mail to:

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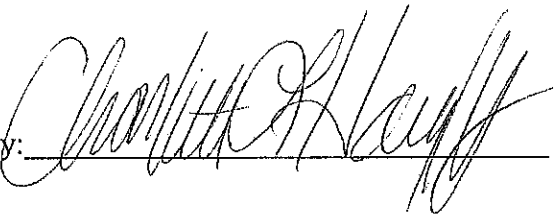
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*Via E-Mail*

By: 

# **Exhibit 1**

RECEIVED JUL 14 4:11 PM '06

*Handwritten initials*

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*Attorneys for Plaintiffs*

IN THE FIFTH JUDICIAL DISTRICT COURT  
WASHINGTON COUNTY, STATE OF UTAH

LYLE JEFFS, in his capacity as Bishop of the  
Fundamentalist Church of Jesus Christ of Latter-  
Day Saints,

Plaintiff,

v.

SHANE STUBBS, an individual; and DAVID  
STUBBS, an individual,

Defendants.

) MEMORANDUM IN SUPPORT OF  
) MOTION FOR TEMPORARY  
) RESTRAINING ORDER AND  
) PRELIMINARY INJUNCTION

) No. 100502442

) Walton

\_\_\_\_\_

Plaintiff Lyle Jeffs, in his capacity as Bishop of the Fundamentalist Church of Jesus Christ of Latter-Day Saints, has filed a motion for preliminary injunction and submits this memorandum in support of that motion.

#### RELIEF REQUESTED

The relief Plaintiffs seek herein is as follows: Restraining defendants and all those acting in concert with defendants, their agents, servants, employees, attorneys, and those persons acting in participation with them, who receive notice of this Order, in person or through counsel, or otherwise, as follows:

1. From, directly or indirectly, personally or through agents or otherwise, coming onto the property located at 1085 North Louis Street, Hildale, Utah (Bishop's Residence) and 1100 North Carling Street, Hildale, Utah (Bishop's Storehouse), and from placing anything whatsoever in or about the granaries located on the property, or on the property itself.
2. From, directly or indirectly, assaulting or attempting to assault, harassing or attempting to harass, communicating with or attempting to communicate with the plaintiff, his family, his agents, and any persons who might be located or found on the property of the Bishop's Storehouse or the Bishop's Residence in Hildale, Utah.

Plaintiff also requests that the Order granting this relief provide that it shall serve as a Writ of Assistance ordering law enforcement, if necessary, to immediately enforce its terms.

#### FACTS

The facts are set forth in the Verified Complaint filed herewith.

### ARGUMENT

Defendants do not have a valid lease on plaintiff's personal property. Their illegitimate attempts to take over the property for the improper purpose of injuring plaintiff and the FLDS community threatens immediate and irreparable harm to the Bishop in his core role of ensuring the safe and continuous food supply the community depends upon. Indeed, defendants' actions, which amount to intentional tampering with property that is a part of a "food distribution system," amount to a second degree felony under Utah law. Plaintiff is therefore entitled to injunctive relief preserving the longstanding status quo, preventing irreparable harm to plaintiff and the entire community through ongoing criminal conduct, and prohibiting defendants from attempting to come onto plaintiff's property, contaminating the granary, or otherwise attempting to use or tamper with plaintiff's property.

I. PLAINTIFF HAS ESTABLISHED THE FACTS NECESSARY TO SUPPORT INJUNCTIVE RELIEF.

Utah R. Civ. P. 65A(e) provides that a preliminary injunction may issue under the following circumstances:

- (1) The applicant will suffer irreparable harm unless the order or injunction issues;
- (2) The threatened injury to the applicant outweighs whatever damage the proposed order or injunction may cause the party restrained or enjoined;
- (3) The order or injunction, if issued, would not be adverse to the public interest; and
- (4) There is a substantial likelihood that the applicant will prevail on the merits of the underlying claims, or the case presents serious issues on the merits which should be the subject of further litigation.

Each of the elements required to be shown under the rule is discussed below.

A. *Irreparable Harm.*

The Utah Supreme Court recognizes the existence of irreparable harm as the most important consideration in determining whether injunctive relief should issue.

The second<sup>11</sup> ground for injunctive relief (irreparable harm) is generally considered the most important. If the moving party is unable to show “that the commission or continuance of some act during the litigation would produce great or irreparable injury . . .,” the motion for injunction will usually be denied, notwithstanding a showing of probable right or entitlement to recovery at law.

*System Concepts, Inc. v. Dixon*, 669 P.2d 421, 427 (Utah 1984) (citing Wright & Miller).

Irreparable harm occurs where a “court would be unable to grant an effective monetary remedy after a full trial because such damages would be inadequate or difficult to ascertain.” *Kikumura v. Hurley*, 242 F.3d 950, 963 (10th Cir. 2001). Utah courts recognize that injunctive relief is proper when damages cannot be measured by any accurate standard:

This court has defined irreparable injury as “[w]rongs of a repeated and continuing character, or which occasion damages that are estimated only by conjecture, and not by any accurate standard. . . . Irreparable injury justifying an injunction is that which cannot be adequately compensated in damages or for which damages cannot be compensable in money.”

*Carrier v. Lindquist*, 2001 UT 105, ¶ 26, 37 P.3d 1112 (quoting *System Concepts, Inc. v. Dixon*, 669 P.2d 421, 427-28 (Utah 1983)).

“Injunctive relief[, however,] is not purely limited to cases where no other possible remedy will be available. Its broader purpose is preventive in nature. . . . A preliminary injunction is ‘an anticipato-

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<sup>1</sup> When *System Concepts* was decided in 1983, Rule 65A(e) was substantially different than it is today. The rule was amended in 1991. At that time, consistent with *System Concepts*, the “most important” requirement of irreparable harm was placed first among the four elements which must be shown for entry of a preliminary injunction.

ry remedy purposed to prevent the perpetration of a threatened wrong or to compel the cessation of a continuing one.' . . . It further serves to 'preserve the status quo pending the outcome of the case.'" *Hunsaker v. Kersh*, 1999 UT 106, ¶ 8, 991 P.2d 67 (citations omitted) ("Loss of business and goodwill may constitute irreparable harm susceptible to injunction"). Explaining *Dixon*, the *Hunsaker* Court stated: "Where *Dixon* refers to an injury 'which cannot be adequately compensated in damages,' it does not limit injunctive relief to those harms which could never be assigned a dollar value. Rather, it merely acknowledges that monetary compensation does not always make an injured party whole." *Id.* at ¶ 9. "It is not meant . . . that the mere existence of an available legal remedy will defeat the right to an injunction, for to have that effect the legal remedy must be as practicable and efficient toward the ends of justice as an injunction." *Id.* n.1 (citation omitted).

In the present case, irreparable harm is threatened on several levels. First, if contaminated grain is mixed with the food-grade grain in the granary, the food-grade grain will be rendered useless. Currently some 60,000 pounds of grain consecrated by community members to the Bishop's Storehouse are being stored in the granary. The community depends upon that food source for sustenance. It cannot be readily replaced, and defendants are unable to respond to any money judgment for the resulting damage.

Second, storing contaminated grain in the granary, even if the grains are not mixed, will cause irreparable harm because the contaminated silos will then be rendered unsanitary and thus unsuitable for use in the grain rotation process, which is necessary to keep the grain from spoiling. With no silos available for rotating the present grain supply, that supply will be damaged or destroyed.

Third, defendants' conduct suggests that they are determined to contaminate the silos regardless of the consequences. How else to explain their willingness, when denied access to property as to which

they have no rightful claim, to destroy locks, break through barriers, and then dump half a load of contaminated wheat on the floor of a silo before leaving? That was a deliberate attempt to injure plaintiff and cause harm just for the sake of causing harm without cause or reason, amounting to criminal conduct. It is precisely the kind of conduct injunctive relief is designed to prevent so that that status quo can be maintained and not irreparably altered.

Finally, the silos in question are part of the Bishop's Storehouse, a religious effort to provide for the just wants and needs of the community based on spiritual guidance. If the Bishop's ability to provide food for the people is injured in the fashion apparently intended by the defendants, that infringement of religious liberty constitutes irreparable harm as a matter of law. *Sumnum v. Pleasant Grove City*, 483 F.3d 1044, 1055 (10th Cir. 2007) (citing *Elrod v. Burns*, 427 U.S. 347, 373 (1976), ("[t]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.")).

In order to preserve the status quo and protect the community's food supply and the Bishop's function, defendants must be enjoined.

B. *Balancing of Potential Injury.*

The second and third requirements of the rule, that threatened injury to the plaintiff outweighs potential injury to the defendant, and that the relief not be adverse to the public interest, are easily satisfied. As described above, the potential consequences of defendants' unrestrained actions to the plaintiff and the community are severe. On the other hand, plaintiff believes defendants have not even made lease payments on leases they purport to have with the Fiduciary that allegedly furnish the basis for their attempts to contaminate the silos; they are unable to respond to a judgment for the value of the grain

they would destroy by mixing the dirty wheat with the food-grade wheat; and they have other alternatives for storage of their grain consistent with the animal feed they intend to store, which they have utilized in the past. Thus, defendants will not be materially harmed if the Court enters injunctive relief.

C. *Public Interest.*

The public interest, in the form of protection of the community's food supply, plainly favors entry of injunctive relief. That public interest is so important that intentionally tampering with it, as defendants are doing here, constitutes a second degree felony under Utah law. *See* Utah Code Ann. §§ 76-6-106, -109. Protection of the Bishop's autonomy according to constitutional principles is also in the public interest.

D. *Likelihood of Success on the Merits.*

In order for a preliminary injunction to issue in plaintiff's favor, plaintiff need only show "probable" entitlement to the relief requested. *System Concepts, Inc. v. Dixon*, 669 P.2d 421, 425 (Utah 1984). Moreover, where—as here—the three harm factors tip decidedly in favor of the movant, the probability of success factor is relaxed:

Generally, "where the moving party has established that the three 'harm' factors tip decidedly in its favor, the 'probability of success requirement' is somewhat relaxed" and "the movant need only show questions going to the merits so serious, substantial, difficult and doubtful, as to make them a fair ground for litigation."

*Nova Health Systems v. Edmondson*, 460 F.3d 1295, 1298 n.6 (10th Cir. 2006) (citations omitted)

Defendants are relying on the authority of a purported lease from the Special Fiduciary of the United Effort Plan Trust. They have no evidence, however, that the Fiduciary was the owner of the granary at any time, and in fact the uncontroverted evidence is that he was not. The granary constitutes personal property, not real property, and has always been operated by the Bishop's office, not by the

UEP Trust. The particular granaries which defendants are attempting to contaminate were moved to their present location from the private residence of Rulon T. Jeffs in Sandy, Utah in approximately 2001.

Given these undisputable facts, plaintiff has shown a probability of success.

II. THE REQUIREMENTS FOR ENTRY OF A TEMPORARY  
RESTRAINING ORDER ARE ALSO SATISFIED.

Rule 65A(b) does not provide separate grounds for issuance of a temporary restraining order. In this case, a temporary restraining order is appropriate for the same reasons that preliminary injunctive relief is appropriate. Defendants have already attempted twice in the past week to contaminate the granary and its content. Most recently, they deliberately dumped contaminated grain on the floor of one of the silos, which could serve no purpose other than to injure plaintiff. They obtained access through the use of force, cutting locks and breaking through barriers. Defendants have a history of personal confrontation, threats, and assault directed at FLDS members, and here the threat of further confrontation is very real.

The rule also provides that a temporary restraining order may be issued without notice if immediate harm will result before the adverse party can be heard, and the applicant or his attorney certifies to the court in writing what, if any, efforts have been made to give notice. In this case, the unpredictable nature of defendants' response to plaintiff's efforts to curtail their criminal mischief and their apparently escalating malice and aggression means that harm may result prior to the giving of notice, or as a result thereof.

CONCLUSION

Based on the foregoing, Plaintiff requests that he be granted the relief prayed for herein along with such other and further relief as the Court deems just and proper.

DATED this 14 day of July, 2010.

SNOW, CHRISTENSEN & MARTINEAU

By Rodney Parker by SA  
Rodney R. Parker  
Attorneys for Plaintiff

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# **Exhibit 2**

FILED 14 11 13  
CLERK OF COURT  
COURT HOUSE  
SALT LAKE CITY, UTAH

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*Attorneys for Plaintiffs*

IN THE FIFTH JUDICIAL DISTRICT COURT  
WASHINGTON COUNTY, STATE OF UTAH

LYLE JEFFS, in his capacity as Bishop of the Fundamentalist Church of Jesus Christ of Latter-Day Saints,	) AFFIDAVIT OF CHAD JOHNSON
	)
Plaintiff,	) No. <u>100502442</u>
	)
v.	) <u>Walton</u>
	)
SHANE STUBBS, an individual; and	)
DAVID STUBBS, an individual,	)
	)
Defendants.	)
_____	)

## AFFIDAVIT

Chad Johnson, being first duly sworn, deposes and states as follows:

1. I am over the age of 21, am competent to testify, and have personal knowledge of the facts set forth herein.
2. I was assigned to care for the Storehouse Grain in 1976 by the Bishop Fred Jessop. This assignment was reaffirmed by subsequent Bishops.
3. I have been taking care of the Storehouse Grain at the Storehouse Grain Mill (Granary) for 34 years. This premise is a food grade operation.
4. I clean and sanitize the Granary regularly to keep the grain in a food grade condition and rotate the grain every 2 months to keep weevil out.
5. I spray the premises with insecticide that has a short life residue.
6. On July 10, 2010 Shane Stubbs, his wife, Dan Stubbs, his wife, Sally Stubbs and Tom Jessop Sr. cut the padlock on the gate and entered the premises of the Granary.
7. I believe they intended to dump grain into the Granary. They put filthy red grain of a very low quality into the dump pit but did not run the augers.
8. There is approximately 60,000 lbs of high quality white grain in the Granary.
9. It is my opinion that had the auger been turned on and the filthy red grain loaded on top of the white grain the value of the food grade content would have been destroyed.
10. It is my opinion had the filthy red grain been run into the Granary, it would have required a complete cleaning and sanitizing of the Granary before it could be used again for food grade storage.



# **Exhibit 3**

FILED  
FIFTH JUDICIAL DISTRICT COURT  
2010 JUL 14 PM 5:05  
WASHINGTON COUNTY

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*Attorneys for Plaintiffs*

IN THE FIFTH JUDICIAL DISTRICT COURT  
WASHINGTON COUNTY, STATE OF UTAH

LYLE JEFFS, in his capacity as Bishop of  
the Fundamentalist Church of Jesus Christ of  
Latter-Day Saints,

Plaintiff,

v.

SHANE STUBBS, an individual; and  
DAVID STUBBS, an individual,

Defendants.

) TEMPORARY RESTRAINING ORDER

) No. 100502442

) Walton

Plaintiff's motion for temporary restraining order was heard by the Court on July 14, 2010. Based upon the facts alleged in the Verified Complaint there is a reasonable basis for issuing this Order without notice which basis fulfills the requirements of Rule 65A(b)(1).

The Court finds:

1. Should defendants not be restrained from coming onto the vicinity of the Bishop's Storehouse and the Bishop's residence in Hildale, Utah, continued verbal and physical altercations have a likely of ensuing which may escalate causing a disturbance of the peace and irreparable injury and harm to the plaintiff and others.
2. Should defendants not be restrained from placing any items into the granaries historically used by the Bishop for communal storage of food for the community, the food supply of the community will be contaminated, and the Bishop's ability to meet the just wants and needs of his congregation in the fulfillment of his ecclesiastical role will likely be impaired, causing immediate and irreparable harm to plaintiff and the community he is called to serve.
3. Defendants, by virtue of the possession and attempted exercise of this lease which purports to eliminate the ability of the Bishop to discharge his religious duties, infringe the free exercise of religion guaranteed by the Constitution of the United States of America in a manner inconsistent with the public interest.
4. On balance, the threatened harm to plaintiff and the public interest if this injunction is not granted outweighs any potential harm to defendants.

5. Because the only apparent harm to defendants before this matter may be heard on the merits is that for several days feed grade grain cannot be stored in the Bishop's Storehouse granary until this matter is heard, no bond should be required.

The Court having reviewed the pleadings, heard the arguments, and being fully advised,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that, pending an evidentiary hearing to be held July ~~27~~<sup>28</sup>, 2010 before this Court, defendants and all those acting in concert with defendants, their agents, servants, employees, attorneys, and those persons acting in participation with them, who receive notice of this Order, in person or through counsel, or otherwise are enjoined as follows:

1. From, directly or indirectly, personally or through agents or otherwise, coming onto the property located at 1085 North Louis Street, Hildale, Utah (Bishop's Residence) and 1100 North Carling Street, Hildale, Utah (Bishop's Storehouse), and from placing anything whatsoever in or about the granaries located on the property, or on the property itself.
2. From, directly or indirectly, assaulting or attempting to assault, harassing or attempting to harass, communicating with or attempting to communicate with the plaintiff, his family, his agents, and any persons who might be located or found on the property of the Bishop's Storehouse or the Bishop's Residence in Hildale, Utah.
3. This order shall serve as a Writ of Assistance ordering law enforcement, if necessary, to immediately enforce the terms of this Temporary Restraining Order.
4. This Order will expire 10 days from the date hereof unless extended by this Court.



# **Exhibit 4**

On 7/14/2010 the Feds took my wheat  
out of the Graimies in Hilldale Utah  
and hauled it across the state line in  
to Arizona and the local officers would  
not stop them at this time the wheat is  
sitting on the ground as we speak and  
I am the only one that currently has a  
lease on the Graimies at this time

Shane Stubbs

# **Exhibit 5**

Honorable Judge Shumate:

Ref: 100502442

We feel like you have been hustled and lied to by the FLDS, Rod Parker, Kenneth Okazaki, and Lyle Jeffs. First off, when I negotiated a lease with Mr. Wisan, there were twenty-three grain silos under Mr. Wisan's care and all of them were empty and had been empty for five-plus years. I am the only one who has a current lease with Mr. Wisan for any of the granaries. Our lease is for four grain silos. (Refer to Stubbs lease Addendum C) There are nineteen grain silos left. The FLDS are more than welcome to negotiate a lease with Mr. Wisan for any of the empty silos like Judge Lindberg said in court in the presence of Rod Parker, Willie, and several other FLDS. (Refer to Report from Arizona Attorney General p 4) If they would have gone through Mr. Wisan instead of just putting their grain in two of the silos, this would have never happened, but for some reason, the FLDS are above the law and the Judge's orders. All they need to do is to go through the front door and get a lease with Mr. Wisan.

As far as contaminating their grain, I have talked to Thomas Jessop Sr. who helped build the grain silos and cleaning station and has completely rebuilt the cleaning machines. Tom Jessop assisted in cleaning and rotating grain and operated this exact system for years. He said what we are doing by taking our organic food-grade wheat straight from the field and thrashing machine to the dump station and directly to one of the silos before it is augured to the cleaning machine is the best way and the way they have always done it. The configuration and size of the augurs is such that running grain directly from the dump station to the cleaning station is not even an option.

The FLDS have tried to stop me and my dad from using our leases with Mr. Wisan since they had problems in Texas. In the summer of 2008 they even have plowed our wheat up. They have grazed their cattle and sheep on it. They have shut the water off so we could not irrigate. They chased our cows and horses out onto the highway, removed gates, tore down fences, and have done lots of different things to harass and stop us. We are now harvesting our grain, and we ask that we be able to do that in peace, to exercise our leases and have access to the Trust granaries as our lease specifies. All people who do not have a lease with Mr. Wisan should be court-ordered to stay off the property and farm land. I feel like this is the wishes of the Arizona Attorney General, Mr. Bruce Wisan the Court Appointed Special Fiduciary of the United Effort Plan, and the Court Appointed Board of Advisors, and Judge Denise Lindberg.

As we speak, several tons of our grain were taken out of the silo and dump station and bagged by the FLDS. They then left our wheat sitting on the ground in gunny sacks, some in the middle of the road right by the entrance of the grain silos, some on the ground by the side of the road by the Zoo, and some down the creek. (see attached photos) WE are the ones being harmed. No harm will take place if my Red Winter Wheat is stored in a silo next to someone else's White Wheat. Storage and processing of different grains and different harvest years is very common in a storage facility like this one with 14 different silos. Where is the law and order? We are only farmers, not lawyers, this is our plea to the court for legal enforcement of our lease and an Injunction against this kind of harassment.

Shane Stubbs 7/16/10