

MONTANA TENTH JUDICIAL DISTRICT COURT, FERGUS COUNTY

<p>UNITED PROPERTY OWNERS OF MONTANA, INC., a Montana non-profit corporation,</p> <p>Plaintiff,</p> <p>vs.</p> <p>MONTANA FISH AND WILDLIFE COMMISSION and MONTANA DEPARTMENT OF FISH, WILDLIFE & PARKS,</p> <p>Defendant.</p>	<p>Cause No.: DV-22-36</p> <p>Judge: Jon A. Oldenburg</p> <p>AFFIDAVIT OF STEVE PLATT</p>
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I, Steve Platt, do hereby declare and attest as follows:

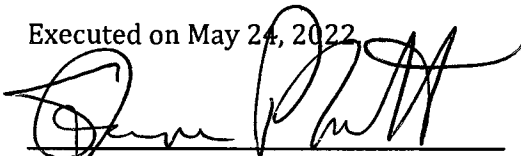
1. I am a resident of Montana.
2. I am over the age of 18 and of sound mind.
3. I have been a member of Helena Hunters and Anglers since its inception in 2001, and have served on its board of directors for many years.
4. I have served as Secretary of the group, organizing its monthly meetings. I help arrange evening programs about Montana's wildlife and wildlife management. I currently serve as HHAA's President.
5. I hunt elk in Montana every fall and brought my kids up as Montana hunters. It is important to me that elk remain a public resource, available to all Montanans with an over-the-counter hunting license. Elk meat is a valuable addition to our family diet.
6. The United Property Owners of Montana (UPOM) litigation threatens the very foundation of elk management and wildlife management in all forms in Montana. This litigation proposes to sever the MFWP Commission from its duties to make important decisions about elk management and harvest. The UPOM lawsuit constitutes a direct threat to my ability to annually hunt elk and gather with friends and family for that expressed purpose.
7. Helena Hunters and Anglers (HHAA) is an all-volunteer conservation group dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare.

HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor recreational opportunity for all citizens to share equally.

8. Individual members of HHAA have been involved with elk management and habitat issues for over 40 years. Our group champions the North American Model of Wildlife Conservation wherein elk and other wildlife are held in public trust for the benefit of all Americans. Our members hunt elk on both public and private lands in western, central and eastern Montana with both archery equipment and rifle. Our members also enjoy watching and seeing elk outside of the fall hunting season. HHAA advocates for the high quality roadless habitat that elk prefer.
9. HHAA members comment on Montana Fish Wildlife and Parks (MFWP) biannual season setting, attend MFWP Commission Meetings, and one of our Board members provided biological input for development of the current Elk Management Plan. Our Board and members work closely with MFWP field biologists and other MFWP wildlife staff, and have done so for many years. We are briefed twice a year by MFWP biologists on the status of Montana elk herds. We attend and provide testimony at Montana legislative committee hearings every two years at the Montana Capital.
10. HHAA engages in numerous public land travel planning efforts, pointing out studies that show that elk avoid open roads. HHAA believes strongly in the importance of scientific wildlife management for all wildlife species, including elk. We strongly oppose the recent trend toward privatization of elk in Montana, wherein elk are treated as a commodity by outfitters and wealthy out of state landowners.
11. All of our volunteer Board members are dedicated life-long elk hunters. Several of our members who are in their 70s and 80s are still hunting elk annually. As HHAA Vice President and one of those life-long elk hunters, Gary Ingman, recently said to me, "We've all raised our kids on elk meat."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 24, 2022

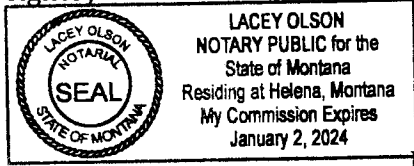


Steve Platt
President, Helena Hunters and Anglers
528 West Lawrence St
Helena, MT 59601

State of Montana
County of Lewis & Clark

This instrument was signed or acknowledged before me on 5/24/22 by

Steve Platt
(Name of signer)



[Handwritten Signature] (Notary
Signature)

[Affix seal/stamp to the left or

below]