

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 2017-CV-210-MJW

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,
LEONARD S. LABRIOLA

Plaintiffs,

v.

KNIGHTS OF COLUMBUS,
THOMAS P. SMITH, JR.
MATTHEW A. ST. JOHN,

Defendants.

AFFIDAVIT OF

I, [REDACTED], being duly sworn do declare under oath:

1. I am currently a past Grand Knight, past Treasurer and current [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]. I am also an appointed State [REDACTED] [REDACTED] [REDACTED] [REDACTED] State Council.
2. I am aware that, within the Knights of Columbus as a whole, there is a widespread fear of retaliation or some form of discipline from Supreme such as removal from office or cancelling of the charter. The [REDACTED] State Deputy has expressed concern over Supreme and the State Council IRS tax status. He has also expressed an unwillingness to issue any statement even one of neutrality without permission from Supreme.
4. Furthermore, within the Knights of Columbus, there is an expectation of absolute obedience to superiors. There is an oath sworn to obey your Superiors within the order as part of the degree programs. That oath requires obedience to your lawfully elected superiors in the order, but does contain exceptions for civic and religious reasons. Most Knight cannot recall the exact words of the oath and almost never remember the exception and will assume absolute compliance is required.
5. I have read the email sent by Supreme on 2/10/17 at 3:19 p.m. With my experience working with the Knights of Columbus and my understanding of their corporate culture, I immediately believed this to be an attempt to intimidate and silence

EXHIBIT C

members and agents from communicating with Uknight. This thought occurred to me before any contact with anyone from the Uknight organization or any knowledge of the cause of action initiated by Uknight. Since under item 4 above most Knights would assume this was binding instructions to avoid all communication with Uknight and thus I reviewed it as subtle form of intimidation.

I, [REDACTED], declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

[REDACTED]

Subscribed and affirmed before me by [REDACTED] this 14th day of February 2017.


Notary Public

My commission expires: 9-7-2026

[SEAL]

