

# EXHIBIT D

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.

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**AFFIDAVIT OF** [REDACTED]

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

1. I am a former field agent with the Knights of Columbus.
2. The Knights of Columbus Supreme Council ("Supreme"), and its Chief Insurance Officer Tom Smith, are widely known to retaliate against members and agents if they believe they have betrayed them and refused to participate in their fraudulent scheme. I have personal experience with this: after I attempted to report a non-existent council and numerous phantom members to Supreme and Tom Smith, false charges were leveled against me by Supreme. I was able to definitively prove to Supreme that these charges were false, but none-the-less I was fired, in my opinion in retaliation for my attempt to report certain fraudulent activity to Mr. Smith and Supreme.
3. I am aware that, within the Knights of Columbus as a whole, there is a widespread fear of retaliation from Supreme, and from Tom Smith in particular.
4. Furthermore, within the Knights of Columbus, there is an expectation of absolute obedience to superiors.
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

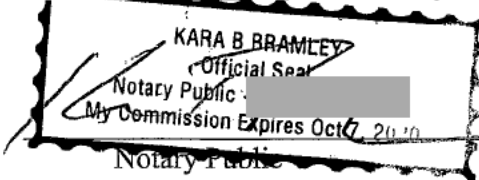
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culture, I understand that email to be an instruction to not cooperate with or testify on behalf of UKnight in this case.

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 14 day of February 2017.



My commission expires: 10/7/2020

[SEAL]