

# EXHIBIT I

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]

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

1. I am a former office manager for a General Agent with the Knights of Columbus.

2. The Knights of Columbus Supreme Council ("Supreme"), and its Chief Insurance Officer Tom Smith and his staff, who are widely known to intimidate agents and general agents who are working hard to ethically grow the Knights of Columbus membership and insurance programs. I have multiple personal experiences that started after one of my agents, who was on-track to be the number one agent in the company, but was not going to present to receive the award because he would not qualify for the awards trip. I was told to put all my energy into making sure this agent qualified for the awards trip. I did get him qualified, but continued to be punished. This went on in many forms for years until I was let go [REDACTED] for disagreeing with the State Deputy who was not following the bi-laws of the Knights of Columbus.

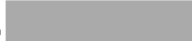
3. I am aware that we were not alone, and that within the Knights of Columbus as a whole, there is a widespread fear of retaliation from Supreme, and from Tom Smith in particular.

4. Furthermore, within the Knights of Columbus, there is an expectation of absolute

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

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



Subscribed and affirmed before me by  \_\_\_\_ day of February 2017.

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

[SEAL]

I understand why this is an emergency situation, but unfortunately we are running out of town and I do not have time to visit a notary. I promise I will have this notarized immediately upon my return.

