

VERIFIED SUPPLEMENT TO URGENT REQUEST FOR INTERVENTION
ALLEGED CIVIL RIGHTS VIOLATIONS
IN STILLWATER COUNTY, MONTANA

December 3, 2025

To: Montana Governor; Montana Attorney General; Montana Department of Public Health & Human Services (DPHHS); Montana Human Rights Bureau; Montana Legislative Leadership; Montana Ombudsman; U.S. Department of Justice – Civil Rights Division; HUD Region VIII (Denver); HUD Office of Inspector General; USDA Rural Development (Montana); EPA Region 8 (Denver); EPA Office of Civil Rights; HHS Administration for Community Living; White House Domestic Policy Council; U.S. Senator Steve Daines; U.S. Senator Tim Sheehy; U.S. Representative Ryan Zinke (MT-01); U.S. Representative Troy Downing (MT-02).

Summary: The actions of Stillwater County and the Park City Sewer District appear to constitute an improper and retaliatory use of public authority to shut down sewage service without lawful cause, resulting in the winter displacement of tenants and interference with housing rights.

The evidence/information below suggests that the Stillwater County Board of Health and the Park City Sewer District engaged in retaliatory and disproportionate conduct that has displaced elderly, disabled, and child tenants from the (b)(6) Privacy, (b)(7)(C) Enf. Privacy property. The coordinated shutdown of sewage service--unsupported by engineering evidence and undertaken without lawful public-health authority--reflects potential unwarranted manipulation of utility infrastructure and discriminatory interference with housing rights. These actions may constitute violations of 42 U.S.C. §1983 (deprivation of rights under color of law), 42 U.S.C. §3617 and 24 C.F.R. §100.400 (Fair Housing Act retaliation and interference), Title II of the Americans with Disabilities Act (42 U.S.C. §12132), and 18 U.S.C. §241 (interference with federally protected rights).

BACKGROUND & TIMELINE

1. Since 1967 or possibly before, the (b) (6) Privacy, (b) (7)(C) Enf. Privacy has been used as an RV and mobile home park. Utility hook-ups (water, sewer, and electric) were typically located in the same vicinity for each RV site.
2. Shortly following the installation of a multi-unit mobile on (b) (6) Privacy in 2010, the Park City Water & Sewer District required the East side sewer service line be upgraded from a 4-inch to 6-inch diameter line. That new 6-inch line was one of the sewer lines that were subsequently disconnected, as described below.

3. County agents inspected the (b) (6) Privacy, (b) (7)(C) Enf. Privacy property sewer system in February 2023; report available upon request. No concerns were noted with the system serving the East side (b) (6) Privacy, (b) (7)(C) Inspectors noted concerns with the system serving the West side (b) (6) Privacy, (b) (7)(C) Enf. Privacy which were subsequently successfully resolved through excavation, line segment repair, and camera inspection; reports available upon request. All sewer system lines serving the property were subsequently disconnected, as described below.
4. In October and November 2024, the four mobiles on (b) (6) Privacy, (b) (7)(C) Enf. Privacy were removed in compliance with a Court Order. Since that time, (b) (6) Privacy, (b) (7)(C) has been vacant, until an unoccupied RV was parked there in October 2025, with no utility hook-ups.
5. On June 3, 2025, numerous employees from MT DEQ, Health Department, Sheriff, HRDC, Action, etc. performed an inspection of the entire (b) (6) Privacy, (b) (7)(C) Enf. Privacy. No sewer leak was observed on the property (The Health Department noted that there was a plugged, but not capped, sewer connection on (b) (6) Privacy, (b) (7)(C) The connection was capped within 3 days; documentation available upon request). The DEQ reported that there were no violations on the property; report available upon request.
6. On September 24, 2025 (b) (6) Privacy, (b) (7)(C) Enf. Privacy inspected the exterior of the duplex building on (b) (6) Privacy, (b) (7)(C) (b) (6) Privacy, (b) (7)(C) walked within 20 feet of alleged leak and noted no puddle, sewage odor, or leak of any kind; report available upon request.
7. (b) (6) Privacy, (b) (7)(C) Enf. Privacy told (b) (6) Privacy that the Fire Station had been complaining about a sewage odor for 3 weeks. No report of the odor was made to (b) (6) Privacy, (b) (7)(C).
8. A 911 report was reportedly made on Saturday morning, November 15th, alleging a sewer leak (news article available upon request). The source of the call and the basis for the claim are unknown. Because the location is not visible from the road, the report suggests either unauthorized entry onto private property or reliance on information that has not been disclosed.
9. The timing--on a weekend when (b) (6) Privacy, (b) (7)(C) maintenance personnel or (b) (6) Privacy, (b) (7)(C) were least expected to be on-site--ensured he could not respond promptly or obtain legal assistance. (b) (6) Privacy, (b) (7)(C) received no notice of the 911 call or any supposed emergency (b) (6) Privacy, (b) (7)(C) encountered the situation only when he arrived and found County personnel already implementing their action plan.
10. Upon arrival at the property and observing the presence of County personnel, (b) (6) Privacy, (b) (7)(C) spoke to them and immediately investigated the leak. (b) (6) Privacy, (b) (7)(C) shoveled around the puddle and obtained evidence that it was a freshwater leak, but the County refused to consider or

examine the evidence (standing water below the lip of the septic pipe, and water seeping into the area from the freshwater line direction 8" to 10" above the septic pipe).

11. (b) (6) Privacy, [REDACTED] went to repair the leak, but the County sheriff stopped him, calling the site "hazardous;" although numerous County personnel later roamed freely in the area (photo evidence available). Sewage-related repairs are routinely performed by thousands of plumbers every day without the work areas being treated as "hazardous."
12. (b) (6) Privacy, (b) (7)(C) Enf. Privacy [REDACTED] reported that the sewer line had cracked at a depth of about six feet. However, underground sewer pipes of this type are normally protected by surrounding soil and do not typically fracture on their own. Engineering literature identifies external disturbance—especially excavation—as a common cause of such damage. The timing and circumstances may reflect disruption associated with excavation rather than an unexplained, spontaneous break.
13. (b) (6) Privacy [REDACTED] also reported that the plumber removed a section of the freshwater supply line (14 feet of severed line, photo evidence available upon request). Such an action suggests that the leak stemmed from the potable-water line, not the sewer line. There is no operational reason to remove a length of freshwater pipe if the issue were solely a sewer leak.
14. There was evidence of an unauthorized and unwarranted inspection of sewer lines (photo of expansion cap replacing a screw cap) on (b) (6) Privacy [REDACTED] East side of property, a separate system from the alleged leak on the West side. This is evidence of unauthorized entry into a capped sewer clean-out on a portion of the property completely unrelated to the alleged leak.
15. Even though the County/District was responding to an alleged sewer leak, they chose to disconnect all sewer lines servicing the property. Disconnecting service is not a recognized method for repairing a sewer issue. Standard practice is to mechanically clear the line by "snaking" and verify normal flow with a freshwater flush. Instead, the County severed the lines from the District system, a method inconsistent with proper sewer maintenance practices.
16. Disconnecting sewer service lines from the treatment system creates a health and safety problem. Occupied safe housing units immediately became uninhabitable with no wastewater outlet. The County is not authorized to create a health and safety emergency in response to addressing a simple plumbing issue. Disconnecting the entire property is not an engineering solution; it is a method of displacing tenants. This action created a new health emergency that did not exist before the County intervened.

17. The disconnection forced displacement of multiple tenants, including elderly, disabled, and children. These persons are among classes explicitly protected under the Fair Housing Act and the Americans with Disabilities Act. The County forced them out during winter and without lawful judicial process.

I respectfully request a review of the actions of Stillwater County Board of Health and Park City Sewer District.

Please consider interviewing the following individuals for possible involvement in the events:

County Commissioner and Park City Water & Sewer District President (b) (6) Privacy, (b) (7)(C) Enf. Privacy
County Emergency Response (b) (6) Privacy, (b) (7)(C) Enf. Privacy
Park City Water & Sewer District (b) (6) Privacy, (b) (7)(C) Enf. Privacy
Sheriff's Department (b) (6) Privacy, (b) (7)(C) Enf. Privacy
(b) (6) Privacy, (b) (7)(C) Enf. Privacy & others with (b) (6) Privacy, (b) (7)(C) Enf. Privacy Builders
Plumber 1 (b) (6) Privacy, connections)
Plumber 2 (alley connections)
County (b) (6) Privacy, (b) (7)(C) Enf. Privacy
Board of Health (b) (6) Privacy, (b) (7)(C) Enf. Privacy
Park City Fire Station personnel

VERIFICATION

I hereby declare under penalty of perjury that the factual statements given above are true and correct, and based on my personal knowledge.

(b) (6) Privacy, (b) (7)(C) Enf. Privacy

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Billings, Montana 59105

Billings, MI 59105

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