

John Green  
18 Reese Dr.  
Sunset Valley, TX 78745  
Tel: (512) 892-6430  
Email: jogreen@austin.rr.com

October 12, 2010

Unauthorized Practice of Law Committee  
Attention: Phillip R. Willoughby, Attorney at Law  
4100 Sweetbrier, Suite 109  
Casper, WY 82604

Re: Complaint of Unauthorized Practice of Law of Eric Molvar

Dear Mr. Milloughby and Committee Members,

I previously complained that Mr. Molvar was practicing law on behalf of a Wyoming corporation, Biodiversity Conservation Alliance, regarding a petition he had filed with the Wyoming Environmental Council seeking to have an area designated as Very Rare and Uncommon. After review, the Committee determined that he had not committed the unauthorized practice of law as any person was entitled to file said petition and that a corporation could be represented by a corporate or full-time employee. See following references. EQC Rules, Chapter 7, Section 6(a) provides that "any person [including a corporation] may file a petition to designate lands as very rare or uncommon . . ." EQC Rules, Chapter 2, Section 6 (a)(iii) provides that "a corporation may appear and be represented by a corporate officer or a full-time employee of said corporation." Mr. Molvar has interpreted Mr. Willoughby's letter of November 6, 2009 to mean that he can act as an attorney, representing the corporation, because he is employed there. I believe that this is a mischaracterization and that he is practicing law without a license.

Attached as Exhibit A is a copy of his **REPLY TO MOTION TO STRIKE AND DISMISS** (which contains Chairperson Willoughby's letter) and Exhibit B, his most recent **OBJECTION TO MOTION FOR CONTINUANCE**. Although I understand that he may appear as a representative and advocate for the corporation, I do not believe that this gives him the right to practice law. "Corporations . . . may appear only through an attorney licensed to practice in Wyoming." UNIFORM RULES FOR DISTRICT COURTS OF THE STATE OF WYOMING, 101(b) (LexisNexis 2007). I don't see anywhere in the EQC rules where the requirement that corporations may appear only through an attorney licensed to practice law in Wyoming is waived, although I understand that anyone can submit a petition.

The drafting of motions is clearly the practice of law. Both definitions of the practice of law include, as they should, drafting legal documents. Rule 11 refers to "drafting pleadings or other documents . . ."41 Rule 11.1 refers to "[p]reparing any legal document . . ."Id., Rule 11.1(a)(6)(A). Drafting a pleading is the practice of law. *Jones v. State*, 902 P.2d at 695. The



key inquiry on whether preparing a document constitutes the practice of law is whether the preparation of the document involves the exercise of discretion. *Perkins v. CTX Mortg. Co.*, 969 P.2d 93, 97 (Wash., 1999) (“The practice of law includes the selection and completion of legal instruments by which legal rights and obligations are established.”)

Additional evidence of misconduct is shown by Mr. Molvar sending out a notice to members of his group urging them to write a letter to the Wyoming Environmental Quality Council (EQC) and to attend a hearing to be held on October 27<sup>th</sup>. This attempt to contact others to attempt to influence the EQC would certainly be a matter of disciplinary inquiry for anyone licensed to practice law in Wyoming. See attached Exhibit C.

It is anticipated that Mr. Molvar is planning to appear before the EQC in their upcoming hearing in a few weeks and will once again, act as an attorney representing the corporation. He is not calling himself an attorney but he is appearing as a corporate pro se attorney, which I believe is not authorized under the laws of Wyoming (if not most other states).

The Bar Rules both make it clear that a non-lawyer may not appear in a representative capacity before a tribunal. Rule 11's definition includes “appearing as an advocate in a representative capacity . . . in connection with a prospective or pending proceeding before any court, court commissioner, or referee.” RULES OF THE SUPREME COURT OF WYOMING PROVIDING FOR THE ORGANIZATION AND GOVERNMENT OF THE BAR ASSOCIATION AND ATTORNEYS AT LAW OF THE STATE OF WYOMING, Rule 11(a)(3). Rule 11.1 says that “[a]ppearing as an advocate in a representative capacity” is the practice of law. *Id.*, Rule 11.1(a)(6)(C). While the act of physically appearing before a tribunal on behalf of another was a part of the former definition, the new definitions encompass more. Under Rule 11, advocating includes “drafting pleadings or other documents; or performing any act in such [representative] capacity in connection with a prospective or pending proceeding . . .”. *Id.*, Rule 11(a)(3). Rule 11.1, too, broadens the notion of representing another party. “[D]rafting pleadings . . . or performing any act in such [representative] capacity in connection with a prospective or pending proceeding” also constitute the practice of law. The definitions are consistent with the general concept that one who “appears” on behalf of another before a tribunal is engaged in the practice of law. The word “appear,” of course, is a term of art in the legal profession. It means advocating for another before a tribunal, which can be done orally or in writing.

An exception is that a person may appear “as an advocate in a representative capacity” before any tribunal “when such conduct is authorized by Wyoming Supreme Court rule,” or any federal, state, or local law. See: RULES OF THE SUPREME COURT OF WYOMING PROVIDING FOR THE ORGANIZATION AND GOVERNMENT OF THE BAR ASSOCIATION AND ATTORNEYS AT LAW OF THE STATE OF WYOMING, Rule 11(c)(1). As a corporate officer, I believe that Mr. Molvar could be called as an advocate to offer testimony but I do not believe that this extends to functions which are recognized as the practice of law. The rules of the EQC nowhere authorizes a person to act as a pro se corporate attorney.



Mr. Molvar is advertising himself as a lawyer or at least creating this impression. A non-lawyer must not only avoid the practice of law, he or she must be careful not to even create the impression of being able to do so. "It shall be unlawful, and punishable as contempt of court, for any person not a member of the Wyoming State Bar to hold himself out or advertise by whatever means as an attorney or counsellor-at-law." Although additional documentation can be found on the BCA's website, here is one web publication for Mr. Molvar showing that he "drafts comments, appeals, and legal briefs on projects affecting public lands".<sup>1</sup> See Exhibit D.

Nearly sixty years ago, long before the adoption of the previous rule defining the practice of law, the Bar brought a contempt action against G. W. Hardy, alleging that he was engaged in the unauthorized practice of law; the resulting decision in *State v. Hardy*, 156 P.2d 309 (1945), is the only time the Wyoming Supreme Court has discussed in any detail what it means to practice law. G. W. Hardy was not a lawyer. He had, nevertheless, allegedly spent some 25 years helping others draft wills. During that time, he drafted "not less than one hundred" wills and held himself out as qualified "to give advice concerning the preparation and drafting" of such documents. The question was, said the court, "whether the preparation and drafting of wills for other persons as a business, together with the giving of legal advice . . . is to be regarded as the practice of law." Perhaps presaging Rule 11.1, the court said "[w]e have not the least doubt that it is . . ." *Id.* at 313

The drafting of wills is the practice of law for three reasons: (1) it requires "profound legal knowledge;" (2) wills can be effective only after they are admitted to and administered by the courts; and (3) the "weight of authority" in other jurisdictions so holds. Accordingly, while a non-lawyer "is privileged to draw his own will, and perhaps to offer advice in his own family . . . that is far different than holding himself out as a competent and qualified adviser to the general public . . ." Any activity which calls for the exercise of discretion, such as interviewing or advising another about the effect of certain choices, involves the practice of law. Also, holding one's self out as qualified to assist others in legal matters virtually ensures a finding of practicing law. I believe this same reasoning applies to Mr. Molvar's activities.

The reason for restricting the practice of law to lawyers is to protect the public; anything which threatens that protection will likely be considered the practice of law. *Id.* at 313; *see also*, WYOMING RULES OF PROFESSIONAL CONDUCT, Rule 5.5, Cmt (LEXIS 2004) ("[L]imiting the practice of law to members of the bar protects the public against rendition of legal services by unqualified persons.") In this case, Mr. Molvar, acting as the pro se attorney for the BCA corporation has filed a petition and continues to act in a legal capacity, much to the harm of the public.

People, such as I, who have property interests in the area are now forced to employ counsel to defend this action or face the consequences if undefended. The public is harmed because a licensed attorney would not file a petition which, I believe, is frivolous because they would be subject to sanctions. According to the U.S. Department of Agriculture's plant database, none of the plants listed in the petition are rare or uncommon and the one fish

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<sup>1</sup> Additionally, this same publication indicates that Suzanne Lewis is an attorney employee with BCA so there is no reason that she could not appear as counsel for the corporation except that she would be subject to regulation and sanctions. Therefore, she could file an entry of appearance and represent the corporation.



identified is not native to the area and was imported into the area by the Game and Fish Department. I believe a licensed attorney would not have filed this petition. Perhaps the filing by Mr. Molvar could be attributed to simple incompetence, yet, by filing the petition, I and others are forced to employ counsel and spend our time and funds to defend this action. Worse, it appears that the BCA, which pays Mr. Molvar a salary, is able to advertise their activities and solicit donations, thus operating, what appears to me, to be an illegal legal mill, churning tax deductible contributions and filing petitions which may be incomplete, inaccurate or simply frivolous.

In *In re Herren*, 138 B.R. 989 (D. Wyo. 1992), the Bankruptcy Court in Wyoming addressed the issue of the definition of the practice of law in deciding whether to recover the fee paid by a debtor to the "Wyoming Document Center," which had assisted the debtor with the bankruptcy filing. Citing *Hardy*, the court had no difficulty finding that the Wyoming Document Center had engaged in the practice of law. It seems to me, a similar conclusion could be found with respect to BCA.

The Wyoming Supreme Court maintains an Unauthorized Practice of Law Committee to police restrictions on those who attempt to practice law without a license. The committee is to "receive complaints alleging the unauthorized practice of law . . . investigate those complaints and initiate litigation in the district court for injunctive relief and/or criminal contempt proceedings." I would respectfully request that a cease and desist order be issued immediately to protect the public from further harm until this matter is fully investigated.

Respectfully



John Green

Copies:

Erik Molvar  
[erik@voiceforthewild.org](mailto:erik@voiceforthewild.org)

Wyoming Environmental Quality Council  
[KWARIN@wyo.gov](mailto:KWARIN@wyo.gov)

Phillip T. Willoughby, Chairperson  
[ptwilloughby@bresnan.net](mailto:ptwilloughby@bresnan.net)

V. Anthony Vehar  
[tvehar@allwest.net](mailto:tvehar@allwest.net)

J. David Horning  
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[tony@wendtlandlaw.com](mailto:tony@wendtlandlaw.com)

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL****STATE OF WYOMING**

A PETITION TO THE ENVIRONMENTAL  
QUALITY COUNCIL FOR DESIGNATION  
OF AN AREA KNOWN AS SAND CREEK  
AS VERY RARE OR UNCOMMON

)  
)  
)  
)

EQC Docket No. 09-1103

**REPLY TO MOTION TO STRIKE AND DISMISS**

The following is the Reply of Biodiversity Conservation Alliance to the Motion to Strike and Dismiss filed by John Green on October 6, 2009.

Mr. Green alleges that Erik Molvar, Executive Director of Biodiversity Conservation Alliance, practiced law without a license in filing a petition to designate Sand Creek as Very Rare or Uncommon Petition before the Environmental Quality Council. Mr. Green's Motion references a Cease and Desist letter issued by Phillip T. Willoughby on behalf of the Wyoming Bar Association dated September 21, 2009.

Subsequent to this Cease and Desist letter, on November 6, 2009 Mr. Willoughby issued a second letter on behalf of the Wyoming Bar Association determining that Mr. Molvar "did not engage in the unauthorized practice of law." See Exhibit A. This letter references an Unauthorized Practice of Law Subcommittee Report ("Report") detailing that Mr. Molvar may appear and represent Biodiversity Conservation Alliance as a full-time employee as specifically permitted by EQC rules, a state administrative regulation, under the Wyoming Bar Association Organization and Government Rule 11.1(c). See Exhibit B at unnumbered 1. The Report concludes, "Pursuant to the exceptions of Rule 11.1(c), Molvar's representation is NOT the unauthorized practice of law." Exhibit B at unnumbered 2, emphasis in original.


EXHIBIT A  
Pg 1 of 4



EQC itself has ruled in its Order Denying Motion for Contempt that under EQC Rules, Chapter 7, "any person may file a petition to designate lands as very rare or uncommon." We concur with this analysis.

As Mr. Molvar has lawfully and solely represented Biodiversity Conservation Alliance in administrative proceedings regarding the potential designation of Sand Creek as Very Rare or Uncommon under the Environmental Quality Act, we ask that the Environmental Quality Council deny Mr. Green's Motion to Dismiss.

Respectfully submitted on this 3<sup>rd</sup> day of May, 2010,

  
Erik Molvar  
Executive Director  
Biodiversity Conservation Alliance  
P.O. Box 1512  
Laramie, Wyoming 82073

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Reply to Motion to Strike and Dismiss was delivered to the following by U.S. Mail, post-paid and return receipt requested, and via fax, as of the date of signature.

John Green  
Mineral Hill, L.P.  
P.O. Box 33010  
Austin, Texas 78764  
FAX (512) 692-2936

  
Erik Molvar

5/3/10  
Date

EXHIBIT A  
Pg 2 of 4

*Phillip T. Willoughby*  
*Attorney at Law*

4100 Sweetbrier, Suite 109  
Casper, WY 82604  
FAX 307-472-1973  
307-266-4549

November 6, 2009

Eric Molver  
P.O. Box 1512  
Laramie, WY 82073

RE: Compliant to Unauthorized Practice of Law Committee

Dear Mr. Molver:

I believe that you know a complaint was filed with the Unauthorized Practice of Law Committee by John Green, general partner of Mineral Hill. As the chairman of the committee I appointed a subcommittee to investigate this matter. I have included a copy of Mr. Green's compliant, initially submitted to the Board of Professional Responsibility. That board does not have jurisdiction over non-attorneys. The matter was referred to my committee.

I enclose the report from the subcommittee.

As indicated it has been determined it is not the unauthorized practice of law for you to appear and file before the EQC. Their rules specifically indicate non-attorneys may practice before the council.

The committee did express concern about your webpage which indicates you author... "appeal and legal briefs" on projects effecting public lands. We are assuming this means before bodies such as the EQC.

As a consequence this committee has decided you did not engage in the unauthorized practice of law.

Sincerely,

THE LAW OFFICE OF PHILLIP T. WILLOUGHBY

  
Phillip T. Willoughby, Chairman U.P.L. Committee

PTW:dcw

c: Steeter Dover, Executive Director of the Wyoming State Bar, with enclosure, by email  
U.P.L. Committee, with enclosure, by email  
John Green, with enclosure

EXHIBIT A

EXHIBIT A  
Pg 3 of 4



(v) An unincorporated association may appear and be represented by any bona fide general officer or full-time employee of such association.

The EQC Rules, a state administrative regulation, permits Molvar, the executive director, to represent Biodiversity Conservation Alliance in EQC proceedings. Pursuant to the exceptions of Rule 11.1(c), Molvar's representation is NOT the unauthorized practice of law. There is one caveat. If Molvar appears on behalf of other entities that he is not a corporate officer for or a full time employee he would be committing the unauthorized practice of law. Please let me know if you disagree or believe I have missed anything.

EXHIBIT A  
Pg 4 of 4

FILED

SEP 29 2010

Jim Ruby, Executive Secretary  
Environmental Quality Council

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL

Amended Petition to the Environmental Quality )  
Council for Designation of an Area Known as )  
Sand Creek as Very Rare or Uncommon )

Docket No. 09-1103

**Opposition to Motion for Continuance**

On behalf of Biodiversity Conservation Alliance, Petitioner, I offer the following responses in opposition to the Motion for Continuance submitted by John A. Moline and others (hereinafter "Opponents"). I will present these responses in the order these issues were raised in the Motion for Continuance.

1. Opponents argue that they have been given inadequate time to prepare a rebuttal calling into question all aspects of the Petition currently before the Council. Opponents argue that "only two months is scheduled for the more comprehensive task of refutation of the petition." This assertion is inaccurate. Several of the individuals and/or groups submitting the Motion for Continuance were present at the July 8, 2010, Environmental Quality Council hearing held in Sundance, Wyoming, at which the Council voted to accept the Petition as complete and schedule a full public hearing to discuss its merits. By virtue of their presence at the initial hearing, Opponents have been well aware that a full hearing is approaching. The Petition itself was submitted on August 12, 2009, and has been available for public review on the EQC's Docket webpage since shortly after that date, including for the entire period since the July 2010 ruling to accept the Petition for full review. Opponents will therefore have had the opportunity to develop any rebuttals they wish to make for a period of almost three months, and have enjoyed the opportunity to scrutinize the petition for a period of more than one year.

Federal agencies commonly allow 30 to 60 days for public review of Environmental Impact Statements concerning federally approved land-use plans or projects, which in Wyoming have in some cases involved millions of acres and which can reach lengths of several volumes with hundreds of pages in each. By contrast, the Petition currently before the Council is only 42 pages long, much of which is made up of lists of addresses. It is eminently reasonable to provide the public a three-month window to review and comment on a document of 42 pages length.

The only timelines specified for public hearings on petitions to designate lands as Very Rare or Uncommon under Section VII of the Rules of Practice and Procedure indicate that a public notice must be published for four consecutive weeks 45 days in advance of the hearing. There is no provision in Section VII for the granting of a Continuance to delay a hearing once it has been scheduled. For these reasons, Opponents have not made a showing that they are entitled to more time.

2. Opponents argue that the Petition relies heavily on Wyoming Game and Fish Department (WGFD) documents, and that the scheduling of a hearing during hunting season makes it "difficult if not impossible" for WGFD personnel to attend or provide testimony. The Petition does in fact assert that over 4,000 acres of mule deer Crucial Winter Range has been designated by WGFD inside the proposed Very Rare or Uncommon area; WGFD designations of Crucial Winter Range are available from the Department headquarters in Cheyenne at any time, including during hunting season, so information to support (or refute) their rebuttal should be readily available to them. The Petition relies more heavily on WGFD conclusions regarding a rare native fish found in the proposed area; WGFD fish biologists should not experience the same demands

EXHIBIT B  
Pg 1 of 2



on their time during hunting season and therefore we see no reason why they would not be available to testify.

Neither Petitioners nor Opponents purport to represent the Wyoming Game and Fish Department, which is not listed among the entities bringing the Motion for Continuance. We are aware of no formal communication from WGFD substantiating the claims of Opponents that WGFD will have difficulty attending the hearing. It is our position that Opponents are not in a position to speak on behalf of WGFD, so this point of the Motion should be denied.

3. Opponents point out that weather introduces uncertainty into the ability of EQC to complete a field tour of the area. This is indeed the case. It is also true that rainy weather, which can occur throughout the spring, summer, and fall, also limits the EQC's ability to complete the tour. As certainty of completing the tour cannot be assured at any time of year, access to the area is risky and weather-dependent at any time of year. Because the ability of the EQC to conduct the hearing successfully does not depend on the field tour, and indeed a field tour is not even required for EQC to designate lands as Very Rare or Uncommon, Opponents have failed to make a showing that a weather-related delay of the tour is necessarily connected to a delay of the hearing itself.

4. Opponents argue that Petitioners will not be prejudiced by a Continuance. In fact, Petitioner Biodiversity Conservation Alliance has incurred the financial obligation to pay \$2,342.80 to the Casper Star-Tribune for publication of the Notice pursuant to requirements in Chapter 7 § 7 of the Rules of Practice and Procedure. Petitioner Biodiversity Conservation Alliance has also incurred the financial obligation to pay \$1,198.52 to the Sundance Times for publication of the Notice pursuant to requirements in Chapter 7 § 7 of the Rules of Practice and Procedure. These Notices have been running in the newspapers in question for several weeks, and no provision has been made for full or even partial refund in the event the Hearing is delayed. If a Continuance is granted, therefore, Petitioner BCA will be prejudiced by the loss of \$3,541.32. As a small nonprofit public interest organization in difficult and uncertain financial times, BCA is not in a position to waste such large sums of funds.

Because Opponents have failed to make a showing that they are inconvenienced by the scheduling of the hearing on its appointed date and time, and because Petitioners would certainly be prejudiced by the delay of the hearing in question, the Council should deny the Motion for Continuance and move forward expeditiously with the hearing pursuant to Chapter VII of the Rules of Practice and Procedure.

Respectfully submitted,



Erik Molvar  
Wildlife Biologist, Biodiversity Conservation Alliance

EXHIBIT B  
Pg 2 of 2



John Green

From:  
Sent:  
To:  
Subject: FW: Help save a rare ecological gem in the Black Hills!

FYI

From: BCA News and Alerts [mailto:erik@voiceforthewild.org]  
Sent: Tuesday, October 12, 2010  
To:  
Subject: Help save a rare ecological gem in the Black Hills!

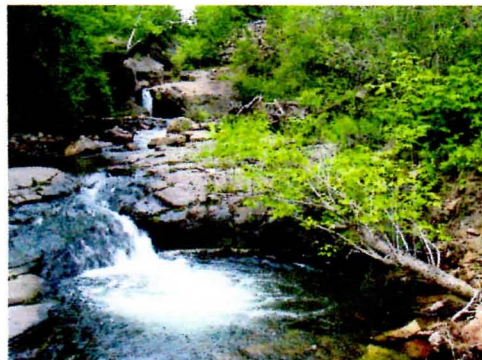


## **The Sand Creek Valley needs protection from open-pit mining - and you can help!**

Sand Creek flows out of one of the last roadless areas left in the Black Hills, bearing a blue-ribbon trout stream, large tracts of old-growth forest, and a collection of botanical rarities seldom found in Wyoming. But a Canadian company named Golden Predator has bought up mineral claims in the headwaters of Sand Creek, threatening the watershed's unique plant and fish populations. ***BCA has petitioned the Wyoming Environmental Quality Council to designate this area as Very Rare or Uncommon under state law,*** and the Council has set a public hearing to make a final decision whether to protect these lands or not.

**This hearing is your chance to speak out on behalf of Sand Creek! Attend and speak at the hearing scheduled for October 27 and 28 in Sundance, Wyoming, or mail in written comments.**

The upper watershed of Sand Creek is a biological ark filled with unusual plant communities that hail from distant lands. Oak-ironwood woodlands and paper birch, along with dozens of species understory plants, hail from the hardwood forests of the eastern United States. The white spruce, common in the mountains above of the Arctic Circle, were marooned in this cool, moist valley when glacial ice sheets retreated northward thousands of years ago. The horsetail, a primitive plant common in the temperate



Falls on Upper Sand Creek

EXHIBIT C  
Pg 1 of 3



rainforests of the Pacific

Northwest, but found almost nowhere else in Wyoming, grows in moist, shady valley bottoms of upper Sand Creek. Known as an ecological refugium, this area represents one of the finest examples of botanical diversity in the Black Hills, an area itself recognized as an island of biodiversity in the midst of the High Plains.

For details of the Very Rare or Uncommon features of this area, visit <http://deq.state.wy.us/eqc/Docket/09-1103%20Sand%20Creek/Sand%20Creek%20Amended%20Petition.8-12-09.pdf> to read the petition itself (this is a large file and may take some time to download).

**The Environmental Quality Council needs to hear from the people of Wyoming that Sand Creek needs to be protected from mining!**

Very Rare or Uncommon designation would protect Sand Creek from non-coal surface mining, preventing open-pit mines that can destroy large tracts of forest habitat and potentially poison streams, killing off fish populations. Local county commissioners and legislators, industry interest groups, and ranchers are opposing the protective designation, while local property owners and conservationists are supporting it. Given the powerful political interests arrayed against us, Sand Creek could really use the support of the people of Wyoming.

If you have been to Sand Creek, or simply want to see one of Wyoming's richest botanical treasures protected,

attend the hearing and speak out or write a letter supporting Very Rare or Uncommon designation to the Environmental Quality Council. Your personal perspective makes a big difference. Letters must be received by October 27<sup>th</sup>, and should be mailed much earlier to have the greatest effect. Mail your letter to:

Environmental Quality Council  
Herschler Building

122 West 25<sup>th</sup> Street, Room 1714  
Cheyenne, Wyoming 82002

**The hearing will be held at the Multipurpose**

**Building in the Crook County Fairgrounds in Sundance, Wyoming, at 9 a.m.** on Wednesday, October 27<sup>th</sup>, with a possible extra half-day of testimony taken on October 28<sup>th</sup> if needed.

***Thanks for using your voice on behalf of one of the last remaining wild places in the Black Hills!***

Sincerely,



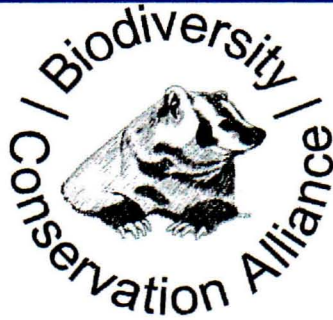
Old-growth ponderosas mixed with paper birch in a very rare plant association

EXHIBIT C  
Pg 2 of 3



Erik Molvar  
Executive Director

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EXHIBIT C  
Pg 3 of 3





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## Erik Molvar

Title and Company:  
Writer at [Biodiversity Conservation Alliance](#)

Company Address:  
P.O. Box 1512  
Laramie, WY 82073

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### Erik Molvar's Biography

Erik Molvar Erik Molvar is Executive Director and Wildlife Biologist of Biodiversity Conservation Alliance. In addition to leading the organization, he authors comprehensive, science-based conservation alternatives for large-scale land management plans, drafts comments, appeals, and legal briefs on projects affecting public lands, and works closely with the media. Erik's studies are internationally published, and he is the author of 14 wilderness guides. Erik has a Master of Science degree from University of Alaska Fairbanks. Suzanne Lewis, Conservation Advocate, writes detailed comments and appeals on oil and gas activities that threaten the world-class wildlife and wild places in Wyoming; Suzanne is also our primary Black Hills forest defense staffer, analyzing and challenging forest projects that affect wildlife and habitat. Suzanne left an estate law private practice of many years to join BCA, and holds a Juris Doctor degree from The American University Duane Short is Wild Species Program Director and primary forest defense staffer for the Medicine Bow National Forest; Duane writes detailed comments and appeals on projects that threaten forest health, oversees the drafting of Endangered Species petitions and litigation, and works closely with the media. Duane holds a Bachelor of Sciences degree in Zoology from Northern Arizona University, is a professional writer and brings more than a decade's conservation volunteer experience to BCA.

Tags: [Biodiversity Conservation Alliance](#), [WY](#), [Writer](#)

### Erik Molvar's Background

[Erik Molvar](#)  
41 years old, Bryan TX

[Erik Molvar](#)  
41 years old, Pomeroy WA

[Erik Molvar](#)  
41 years old, Tucson AZ

[Erik Molvar](#)  
41 years old, Frisco CO

Learn more about

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Mar 1, 2004 ...  
Biodiversity Conservation Alliance Announces Red Desert Outfitters

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EXHIBIT D  
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