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Attorneys for Idaho Department of Lands, Navigable Waterways Program

**BEFORE THE STATE BOARD OF LAND COMMISSIONERS
STATE OF IDAHO**

IN THE MATTER OF

Encroachment Permit Application
No. L-96-S-2863A

Patrick Lewis E. Trust,

Applicant.

Agency Case No. PH-2026-NAV-20-001

OAH Case No. 26-320-03

**IDAHO DEPARTMENT OF LANDS’
WITNESS AND EXHIBIT LIST**

The Idaho Department of Lands (“IDL”), by and through its counsel of record Kayleen Richter, submits the following Witness and Exhibit List in accordance with the *Scheduling Order* issued February 4, 2026. As the record remains open, IDL reserves the right to modify this witness and exhibit list prior to hearing.

I. WITNESSES

IDL may call the following witnesses in this matter:

1. Mike Ahmer
Idaho Department of Lands – Resource Supervisor – Navigable Waters
3258 Industrial Loop, Coeur d’Alene, ID 83815
Phone: (208)769-1577
2. Any other witness that has been or will be identified or called by any other party,
or any other witness participating in the above-captioned matter.

II. EXHIBITS

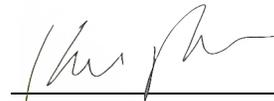
IDL may present the following exhibits in this matter:

- **IDL-001** – Application L-96-S-2863A
- **IDL-002** – Legal Notice of Application, Request
- **IDL-003** – Legal Notice of Application, Order Confirmation and Press Affidavit
- **IDL-004** – Notice of Application to Agencies
- **IDL-005** – Notice of Application to Adjacent Neighbors
- **IDL-006** – Adjacent Owner Objection, Margaret Williams
- **IDL-007** – Temporary Land Use Permit No. LU300091 (C. Swanson)
- **IDL-008** – Temporary Land Use Permit No. LU300046 (K. Budge)
- **IDL-009** – Adjacent Owner Objection, Kevin Chadwick
- **IDL-010** – Legal Notice of Hearing, Order Confirmation and Press Affidavit
- **IDL-011** – Encroachment Permit L96S2863
- **IDL-012** – Public Trust Program Inspection Report, L96S2863

IDL reserves the right to cross-examine any party to this matter, or any non-party witness called to testify during the public hearing. IDL also reserves the right to reference or utilize any document in the record or identified as a possible exhibit by any party or non-party to this matter. IDL further reserves the right to call additional rebuttal witnesses, impeachment witnesses, and any witness identified by the Applicant. Finally, IDL reserves the right to amend or supplement this list in advance of the hearing.

DATED this 13th day of February 2026.

IDAHO DEPARTMENT OF LANDS



Kayleen R. Richter
Attorney for Idaho Department of Lands

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of February 2026, I served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Patrick Lewis E. Trust P.O. Box 14136, Scottsdale, AZ 95267 (602) 663-2600 <i>Applicant</i>	<input checked="" type="checkbox"/> Email: lew@patrickproperty.com
Bob Presta CE Kramer Crane and Contracting 46820 Highway 2, Hope, ID 83836 (208) 264-3021 <i>Agent for Applicant</i>	<input checked="" type="checkbox"/> Email: bob@cekramer.com
Peter J. Smith IV Fennemore Craig, P.C. 233 E. Harrison Avenue, Coeur d'Alene, ID 83814 (208) 956-0145 <i>Attorney for Applicant</i>	<input checked="" type="checkbox"/> Email: peter.smith@fennemorelaw.com
Arthur Bistline Bistline Law, PLLC 1205 N. Third Street, Coeur d'Alene, ID, 83814 (208) 665-7270 <i>Attorney for Objector Williams</i>	<input checked="" type="checkbox"/> Email: service@bistlinelaw.com
Kevin Chadwick 2365 E. Tennessee Avenue, Denver, CO 80209 (303) 619-6877 <i>Objector</i>	<input checked="" type="checkbox"/> Email: kevinspears.chadwick@gmail.com
W.H. Williams Family LLC Ruth Williams c/o Margaret Williams 29 Eagle Cove, Sandpoint, ID 83864 (208) 946-7105 <i>Objector</i>	<input checked="" type="checkbox"/> Email: mrwlaw1315@gmail.com

<p>Tyler Warner Rachel King Marde Mensinger Idaho Department of Lands 300 N. 6th Street, Boise, ID 83720 (208) 334-0248 <i>IDL Navigable Waterways Program Contacts</i></p>	<p><input checked="" type="checkbox"/> Email: twarner@idl.idaho.gov rking@idl.idaho.gov mmensinger@idl.idaho.gov</p>
<p>Kourtney Romine Kayla Dawson <i>IDL Service Contacts</i></p>	<p><input checked="" type="checkbox"/> Email: kromine@idl.idaho.gov kdawson@idl.idaho.gov</p>
<p>OAH General Government Division P.O. Box 83720, Boise, ID 83720-0104 816 W. Bannock Street (208) 605-4300</p>	<p><input checked="" type="checkbox"/> Email: filings@oah.idaho.gov leslie.hayes@oah.idaho.gov</p>



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