



1 3.

2 At all material times, Corey & Lange Rodeo Co. (“Defendant Corey & Lange”) is a for-  
3 profit corporation located in the city of Moses Lake, in the State of Washington, doing regular and  
4 sustained business in Deschutes County, State of Oregon.

5 4.

6 At all material times, Professional Rodeo Cowboys Association, Inc. (“Defendant PRCA”) was a non-profit corporation located in the city of Colorado Springs, State of Colorado, doing  
7 regular and sustained business in Deschutes County, State of Oregon.

8 5.

9 Upon information and belief, John Does 1-4 were independent contractors or employees  
10 and/or agents of Defendant Corey & Lange, contracted and/or employed to provide services as  
11 “pickup men” during the Sisters Rodeo.

12 6.

13 Upon information and belief, John Does 5-6, contracted with Defendant Sisters Rodeo to  
14 design, construct, inspect, and/or maintain the rodeo arena and update the safety features and  
15 structures of the rodeo arena.

16 7.

17 Upon information and belief, John Doe 7 was employed by Defendants Sisters Rodeo  
18 and/or Corey & Lange as a veterinarian to ensure the safe and humane treatment of the rodeo  
19 livestock at the Sisters Rodeo.

20 8.

21 The true names and capacities, whether individual, corporate, or otherwise, of Defendants  
22 Black Corporation, White Company, a partnership, and John Does 1-7, inclusive, are unknown to  
23 Plaintiffs, who, therefore, sue said Defendants by said fictitious names. Plaintiffs are informed, and  
24 believe, and therefore allege, that each of said Defendants was negligent and/or strictly liable, and/or  
25 otherwise responsible in some manner for the events and occurrences herein referred to including,  
26

1 but not limited to, the design, construction, inspection, testing, and/or maintenance of the rodeo  
2 arena premises or the care and supervision of the livestock participating in the Sisters Rodeo,  
3 including a rodeo bull named “Party Bus.”

4 9.

5 Venue in this case is proper in Deschutes County, State of Oregon because the actions or  
6 inactions giving rise to this Complaint occurred in Deschutes County, State of Oregon. This court  
7 has general jurisdiction over this case pursuant to Oregon Revised Statutes 14.030.

8 **FACTUAL ALLEGATIONS**

9 10.

10 Defendant Sisters Rodeo Association holds an annual Sisters Rodeo for the general public’s  
11 entertainment. At all times material herein, Defendant Sisters Rodeo owned and/or managed an  
12 annual multi-day rodeo event held at their arena located at 67637 Highway 20, Bend, OR 97703.  
13 The rodeo event features acts involving dangerous livestock. The events take place in a fenced  
14 arena that is surrounded by bleachers for the viewing public. Outside the arena are public spaces  
15 including concession areas. Defendant Sisters Rodeo charges fees to enter the rodeo, and  
16 Plaintiffs paid for admission to the rodeo and surrounding grounds.

17 11.

18 At all material times, Defendant Corey & Lange provided rodeo livestock to the Sisters  
19 Rodeo and are the owners of the three-year-old bull “Party Bus.”

20 12.

21 At all material times, Defendant Sisters Rodeo was a member of Defendant PRCA, the  
22 largest rodeo association in the world. Upon information and belief, Defendant PRCA inspected,  
23 authorized, and approved the Sisters Rodeo premises and rodeo livestock, including the arena  
24 fencing and Party Bus, to ensure compliance with its own standards, policies, and procedures  
25 pertaining to premises safety, spectator safety, and animal safety and control.  
26

13.

On June 8, 2024, Plaintiffs Kristin Wert and Andrew Wert attended Defendant Sisters Rodeo’s annual rodeo in Sisters, Oregon. During a rodeo event, at approximately 9:45 p.m., “Party Bus” leaped over the arena fence and into the crowded bleachers, then continued running toward the concessions stands outside of the rodeo stadium. At the same time, Plaintiff Kristin Wert was standing in the concessions area of the premises when suddenly and through no fault of her own, she was violently attacked from behind, bucked into the air, and then trampled by Party Bus.

14.

Plaintiff Andrew Wert was standing nearby and witnessed his wife being attacked and injured by Party Bus. As a result, Plaintiff Andrew Wert suffered significant emotional and psychological trauma.

15.

As a result of being attacked by the bull, Plaintiff Kristin Wert suffered injuries to her left shoulder including a proximal left humeral bone contusion with question of trabecular fracture, significant intramedullary edema, a sprain of the left rotator interval with possible labral injury, posttraumatic tendinitis of the left rotator cuff, and thoracic outlet syndrome. She further suffered injuries to her left knee, including abrasions and swelling, edema within the anteromedial knee and lateral aspects of the distal thigh, and injuries to the ligament and meniscus. She also suffered contusions on the left thigh, the right ankle, and the right shin, with swelling in the right foot, and severe bruising. In addition, Plaintiff Kristin Wert suffered a concussion causing persistent migraines, dizziness, and nausea, post-traumatic stress syndrome, emotional distress, and pain and suffering.

16.

Plaintiff Kristin Wert has suffered, and will continue to suffer in the future, inconvenience and interference with her normal and usual activities as a result of her injuries caused by Party Bus.

1 All of Plaintiff Kristin Wert's injuries are new conditions or exacerbations and/or aggravations of  
2 pre-existing but sedate asymptomatic conditions.

3 **FIRST CLAIM FOR RELIEF**  
4 **PLAINTIFF KRISTIN WERT**  
5 **(Negligence Against All Defendants)**

6 17.

7 Plaintiff Kristin Wert incorporates and realleges Paragraphs 1-16 above.

8 18.

9 Defendants, and each of them, were negligent and at fault in the following particulars:

10 (a) Failing to maintain a safe environment for attendees of the rodeo by securing the  
11 arena area to prevent rodeo livestock from escaping;

12 (b) Failing to keep rodeo livestock safely contained and under control in the rodeo  
13 arena;

14 (c) Failing to ensure that the bull "Party Bus" was in a safe and healthy condition and  
15 in all respects suitable to be released into the arena at the Sisters Rodeo;

16 (d) Failing to have a warning system in place for invitees of the Sisters Rodeo that  
17 would alert them of any potential danger and/or harm;

18 (e) Failing to make the premises reasonably safe for invitees including Plaintiffs;

19 (f) Failing to adequately train the rodeo livestock to remain within the rodeo arena;

20 (g) Failing to provide pick-up-men with appropriate experience and training to  
21 manage rodeo livestock used at Sisters Rodeo;

22 (h) Failing to manage the rodeo livestock in a safe manner, including how and when  
23 the rodeo livestock was released into the rodeo arena;

24 (i) Failing to properly train rodeo employees on how and when rodeo livestock were  
25 to be released into the rodeo arena;

1 (j) The Defendants, and each of them, knew and were aware that rodeo livestock  
2 such as a bull could jump the arena fence and harm spectators of the rodeo; and

3 (k) Employing harmful and inhumane techniques to rodeo livestock in an effort to  
4 yield enhanced performance for entertainment purposes.

5 **SECOND CLAIM FOR RELIEF**

6 **PLAINTIFF ANDREW WERT**

7 **(Loss of Consortium)**

8 19.

9 Plaintiff Andrew Wert incorporates and realleges Paragraphs 1 through 18 above.

10 20.

11 As a direct and foreseeable result of the negligence of Defendants, and each of them,  
12 Plaintiff Kristin Wert suffered and continues to suffer injuries that have limited her physical  
13 abilities, causing constant pain which at times is unmanageable, emotional distress and  
14 depression, nightmares and night terrors, and frustration of not being able to care for her family  
15 as she did prior to this terrible incident. As a result, Plaintiff Andrew Wert has suffered a loss of  
16 consortium while having to take over all aspects of caring for his family due to the pain and  
17 suffering his wife was and continues enduring, all to his general damage in the amount of  
18 \$500,000.00.

19 **THIRD CLAIM FOR RELIEF**

20 **PLAINTIFF ANDREW WERT**

21 **(Negligent Infliction of Emotional Distress)**

22 21.

23 Plaintiff Andrew Wert incorporates and realleges Paragraphs 1 through 20 above.

24 22.

25 As a direct and foreseeable result of the negligence of Defendants, and each of them,  
26 Plaintiff Andrew Wert has experienced emotional distress from witnessing the bull attacking and

1 injuring his wife. As a result, Plaintiff Andrew Wert has been damaged in the amount of  
2 \$100,000.00.

3 **DAMAGES**

4 **(Kristin Wert)**

5 As a result of the injuries caused by Defendants' negligence, Plaintiff Kristin Wert has  
6 suffered and will continue to suffer pain, inconvenience, interference, and disruption to her  
7 normal and usual activities, loss of enjoyment of life, and loss of earning capacity. Plaintiff  
8 Kristin Wert has suffered non-economic damages in the amount of \$1,500,000.00, subject to  
9 amendment at trial.

10 23.

11 As a further result of the negligence of Defendants, and each of them, Plaintiff Kristin  
12 Wert has suffered economic damages in the form of past and future medical care and expenses.  
13 Specifically, she has incurred reasonable and necessary expenses for hospital care, doctor  
14 treatments, follow-up care, imaging studies, physical and psychological therapies, and other  
15 related medical care to treat her injuries to her economic damage in the amount of \$64,356.64.

16 24.

17 As a further result of the negligence of Defendants, and each of them, Plaintiff Kristin  
18 Wert will incur future medical expenses for reasonable and necessary treatments for her injuries  
19 in the amount of \$100,000.00, subject to amendment at trial. In addition, Plaintiff Kristin Wert  
20 incurred lost wages in the amount not to exceed \$25,000.00, to be proven at trial.

21  
22 WHEREFORE, Plaintiffs Kristin Wert and Andrew Wert pray for a judgment against  
23 Defendants, and each of them, as follows:

- 24 1. On Plaintiff Kristin Wert's First Claim for Relief:
- 25 a. Non-economic damages not to exceed \$1,500,000.00;
  - 26 b. Economic damages for reasonable and necessary medical expenses of

1 \$64,356.64, subject to amendment to accurately reflect the amount of medical  
2 expenses incurred up to and including the time of trial;

3 c. Future economic damages for continuing future medical expenses in the  
4 amount of \$100,000.00;

5 d. For economic damages for lost wages in the amount of no less than  
6 \$25,000.00, subject to amendment at trial.

7 e. Award of costs of this action to Plaintiff;

8 f. For such other relief as this court deems necessary and proper.

9 2. On Plaintiff Andrew Wert's Second Claim for Relief:

10 a. Non-economic damages in the amount of \$500,000.00;

11 b. For plaintiff's costs and disbursements; and

12 c. For such other relief as this Court deems proper.

13 3. On Plaintiff Andrew Wert's Third Claim for Relief:

14 a. Non-economic damages in the amount of \$100,000.00;

15 b. For Plaintiff's costs and disbursements; and

16 c. For such other relief as this Court deems proper.

17  
18 DATED this 29th day of May, 2026.

19 NICHOLS LAW GROUP LLC

20  
21 /s/ Craig A. Nichols

22 Craig A. Nichols, OSB No. 830700

23 Geoff M. Nichols, OSB No. 153973

24 Of Attorneys for Plaintiffs

25 Trial Attorney:  
26 Craig A. Nichols, OSB No. 830700