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**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**PLAINTIFF ST. LUKE'S HEALTH
SYSTEM, LTD'S FIRST REQUESTS
FOR ADMISSION TO DEFENDANT
AMMON BUNDY**

Plaintiff St. Luke's Health System, LTD ("Plaintiff"), by and through its attorney of record, hereby requests Defendant Ammon Bundy ("Bundy") answer all requests for admission in accordance with the Instructions and Definitions set forth below within thirty (30) days from

the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

I. INSTRUCTIONS REGARDING REQUESTS FOR ADMISSION

Pursuant to Rule 36 of the Idaho Rules of Civil Procedure, the requests for admission set forth below must be answered within thirty (30) days or such time as the Court directs. They must be answered fully and separately in writing, under oath, and in accordance with the Idaho Rules of Civil Procedure. Your answers must draw upon not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents, employees, or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Pursuant to Rule 36(a), each matter for which an admission is requested shall be separately set forth. For each request for admission which includes subparts, your answer to each subpart should be separately set forth wherever appropriate or necessary to distinguish your answer from another subpart or request for admission.

Each matter shall be deemed admitted unless, within such time as the Court directs, you serve upon the undersigned a written answer in conformance with the requirements of Rule 36(a). You are hereby advised that a failure to specifically answer any request for admission or matter contained therein, or an evasive answer to any request for admission or matter contained therein, may be deemed an admission of the truth of such request or matter contained therein.

II. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant Ammon Bundy, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

l. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings,

transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

- m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:
 - i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
 - ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;

iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;

iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and

v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

i. The name;

ii. The business address and telephone number;

iii. The residence address and telephone number; and

iv. The name of the employer or business with whom the person was associated and the person’s title and position at the time relevant to the identification.

o. “Identify” when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.

p. “Knowledge” shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.

q. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

r. The words “relate to” or “relating to” shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.

s. “Infant” shall mean Defendant Diego Rodriguez’s infant grandson, as described in the Complaint.

t. “Infant’s Parents” shall mean the natural parents of the Infant.

u. “PCP” shall mean the Infant’s primary care provider whose services are or were provided at Functional Medicine of Idaho.

v. “Immediate Families” shall include the person’s spouse, children, children’s spouses, and grandchildren.

w. “DHW” shall mean the Idaho Department of Health and Welfare.

III. REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that You are one of the founders of People’s Rights Network.

REQUEST FOR ADMISSION NO. 2: Admit that You control Defendant People’s Rights Network.

REQUEST FOR ADMISSION NO. 3: Admit that You control what is posted on the website www.peoplesrights.org

REQUEST FOR ADMISSION NO. 4: Admit that You approve the content that is posted on the website www.peoplesrights.org

REQUEST FOR ADMISSION NO. 5: Admit that You caused People’s Rights Network to post a link to <https://freedomman.org/cyrus/> at https://www.peoplesrights.org/news_view/?baby-wrongfully-torn-from-arms-of-mother-in-

[meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3&page%5bscroll%5d=first_update%7C400%7C200](https://www.peoplesrights.org/news_view?baby-wrongfully-torn-from-arms-of-mother-in-meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3&page%5bscroll%5d=first_update%7C400%7C200)

REQUEST FOR ADMISSION NO. 6: Admit that You intended People’s Rights Network to endorse the statements made at <https://freedomman.org/cyrus> through People’s Rights Network posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 7: Admit that You intended People’s Rights Network to spread to a wider audience the statements made at <https://freedomman.org/cyrus> through People’s Rights Network posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 8: Admit that <https://freedomman.org/cyrus> links to numbered blog posts from Diego Rodriguez.

REQUEST FOR ADMISSION NO. 9: Admit that You intended People’s Rights Network to endorse the statements made in the numbered blog posts linked at <https://freedomman.org/cyrus> through People’s Rights Network posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 10: Admit that you intended People’s Rights Network to spread to a wider audience the statements made in the numbered blog posts linked at <https://freedomman.org/cyrus> through People’s Rights Network posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 11: Admit that You caused People’s Rights Network to post during the period March 12, 2022 through March 18, 2022, the statements found at https://www.peoplesrights.org/news_view?baby-wrongfully-torn-from-arms-of-mother-in-meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3&page%5bscroll%5d=first_update%7C400%7C200.

REQUEST FOR ADMISSION NO. 12: Admit that You caused People’s Rights Network to post during the period March 12, 2022 through March 18, 2022, the images found at https://www.peoplesrights.org/news_view?/baby-wrongfully-torn-from-arms-of-mother-in-meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3&page%5bscroll%5d=first_update%7C400%7C200.

REQUEST FOR ADMISSION NO. 13: Admit that You directed People’s Rights Network to publish a wanted poster accusing Mr. Roth of “Criminal accessory of child abduction and deprivation of rights under color of law.”

REQUEST FOR ADMISSION NO. 14: Admit that You directed People’s Rights Network to post the statements about Dr. Natasha Erickson found at https://www.peoplesrights.org/news_view?/baby-wrongfully-torn-from-arms-of-mother-in-meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3&page%5bscroll%5d=first_update%7C400%7C200

REQUEST FOR ADMISSION NO. 15: Admit that You directed People’s Rights Network to post the image of Dr. Natasha Erickson found at https://www.peoplesrights.org/news_view?/baby-wrongfully-torn-from-arms-of-mother-in-meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3&page%5bscroll%5d=first_update%7C400%7C200

REQUEST FOR ADMISSION NO. 16: Admit that You control Defendant Ammon Bundy for Governor.

REQUEST FOR ADMISSION NO. 17: Admit that Ammon Bundy for Governor’s website is <https://www.votebundy.com>

REQUEST FOR ADMISSION NO. 18: Admit that You control what is posted on <https://www.votebundy.com>

REQUEST FOR ADMISSION NO. 19: Admit that You approve the content that is posted on the website <https://www.votebundy.com>

REQUEST FOR ADMISSION NO. 20: Admit that You caused Ammon Bundy for Governor to post a link to <https://freedomman.org/cyrus/> at https://team.votebundy.com/news_view/?baby-cyrus-was-kidnapped&id=07a42730-c674-421a-a5dd-66d25464089b

REQUEST FOR ADMISSION NO. 21: Admit that You intended Ammon Bundy for Governor to endorse the statements made at <https://freedomman.org/cyrus> through Ammon Bundy for Governor posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 22: Admit that You intended Ammon Bundy for Governor to spread to a wider audience the statements made at <https://freedomman.org/cyrus> through Ammon Bundy for Governor posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 23: Admit that You intended Ammon Bundy for Governor to endorse the statements made in the numbered blog posts linked at <https://freedomman.org/cyrus> through Ammon Bundy for Governor posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 24: Admit that You intended Ammon Bundy for Governor to spread to a wider audience the statements made in the numbered blog posts linked at <https://freedomman.org/cyrus> through Ammon Bundy for Governor posting the link to <https://freedomman.org/cyrus>.

REQUEST FOR ADMISSION NO. 25: Admit that the Twitter handle @RealABundy is Your Twitter handle.

REQUEST FOR ADMISSION NO. 26: Admit that You control what is posted under the Twitter handle @RealABundy.

REQUEST FOR ADMISSION NO. 27: Admit that @RealABundy has posted multiple times with the hashtag #savebabycyrus.

REQUEST FOR ADMISSION NO. 28: Admit that in each instance that @RealABundy has posted with the hashtag #savebabycyrus, You caused the post to be made.

REQUEST FOR ADMISSION NO. 29: Admit that in each instance that @RealABundy has posted with the hashtag #savebabycyrus, You approved the content of the post.

REQUEST FOR ADMISSION NO. 30: Admit that You caused @RealABundy to post on March 12, 2022, the statement, “Today hundreds of people gathered with us at St. Luke’s in Boise to demand an end to medical tyranny and a prompt return of Baby Cyrus to his loving parents. Thank you to everyone who showed up to support the Anderson family.”

REQUEST FOR ADMISSION NO. 31: Admit that You caused @RealABundy to post on March 12, 2022, photos taken at the protests at St. Luke’s.

REQUEST FOR ADMISSION NO. 32: Admit that You caused @RealABundy to post on March 12, 2022, the statement, “Please read. Last night my very good friend Diego’s grandson was medically kidnapped because a medical practitioner called CPS for a missed doctor appointment. If this happened to them, it could happen to you. We must stand against this medical tyranny. freedomman.org/cyrus/”

REQUEST FOR ADMISSION NO. 33: Admit that You caused @RealABundy to post on March 12, 2022, an official statement from Ammon Bundy for Governor Campaign, “In the early morning of March 12, 2022, while standing for parental rights and against medical tyranny, Ammon Bundy was arrested in front of St. Luke’s Hospital in Meridian for the crime of disagreeing with the hospital and CPS. Make no mistake about it, this was an ambush arrest with no legal grounds. Ammon arrived at St. Luke’s in support of the Anderson family, whose baby Cyrus had been medically kidnapped earlier in the night, due to a missed non-emergency doctors appointment. Ask yourself this, if they can revoke your parental rights and take custody of your child over a missed doctor appointment, what else can they do and how did they get this power? That can be answered by looking at one of the many emergency orders imposed on the people of Idaho by Governor Brad Little. Idaho must unite against medical tyranny and take back our rights.”

REQUEST FOR ADMISSION NO. 34: Admit that You caused @RealABundy to post on March 14, 2022, a link to a video from oann.com.

REQUEST FOR ADMISSION NO. 35: Admit that You caused @RealABundy to post on March 15, 2022, the statement, “EMERGENCY MESSAGE. Please gather at the hospital now. St Luke’s Boise.”

REQUEST FOR ADMISSION NO. 36: Admit that You caused @RealABundy to post on March 15, 2022, a link to a video on youtube.com titled “Emergency Message Cyrus”

REQUEST FOR ADMISSION NO. 37: Admit that You caused @RealABundy to post on March 16, 2022, the statement that “People will also be at St. Luke’s Boise between 10am and 8pm.”

REQUEST FOR ADMISSION NO. 38: Admit that You caused @RealABundy to post on March 17, 2022, a link to a video on youtube.com titled “Your children do not belong to you!”

REQUEST FOR ADMISSION NO. 39: Admit that You caused @RealABundy to post on March 18, 2022, a link to a video on youtube.com titled “Baby Cyrus Was Returned Home Today!!”

REQUEST FOR ADMISSION NO. 40: Admit that You caused @RealABundy to post on March 31, 2022, a link to a video on rumble.com, found at <https://rumble.com/vz4taq-whisltblower-pie-episode-8-03292022.html>.

REQUEST FOR ADMISSION NO. 41: Admit that You caused @RealABundy to post a link to a written post titled “Child Trafficking Through the Courts” on rumble.com, found at <https://rumble.com/vz4taq-whisltblower-pie-episode-8-03292022.html>.

REQUEST FOR ADMISSION NO. 42: Admit that You caused to be posted the video found at: <https://www.facebook.com/realammonbundy/videos/423278493120502/>.

REQUEST FOR ADMISSION NO. 43: Admit that You caused to be posted on March 13, 2022, a video on youtube.com titled “Baby Cyrus is worse now.”

REQUEST FOR ADMISSION NO. 44: Admit that You authorized the written post titled “Child Trafficking Through the Courts” found at <https://rumble.com/vz4taq-whisltblower-pie-episode-8-03292022.html>.

REQUEST FOR ADMISSION NO. 45: Admit that You authorized the posting of the video found at <https://rumble.com/vz4taq-whisltblower-pie-episode-8-03292022.html>.

REQUEST FOR ADMISSION NO. 46: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=wS2b9UR8DOM> on March 18, 2022 titled “Baby Cyrus Was Returned Home Today!!”

REQUEST FOR ADMISSION NO. 47: Admit that You stated there was “no reason” for the Infant to be in DHW custody.

REQUEST FOR ADMISSION NO. 48: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=6xkz0z5ZrAU> on March 13, 2022, titled “Save Baby Cyrus Interview with Ammon Bundy”.

REQUEST FOR ADMISSION NO. 49: Admit that You stated, “We need a physical presence. We need to put physical pressure upon those that are causing this problem.”

REQUEST FOR ADMISSION NO. 50: Admit that when you stated, “We need to put physical pressure upon those that are causing this problem,” You meant that St. Luke’s should have physical pressure applied to it.

REQUEST FOR ADMISSION NO. 51: Admit that when you stated, “We need to put physical pressure upon those that are causing this problem,” You meant that Mr. Roth should have physical pressure applied to him.

REQUEST FOR ADMISSION NO. 52: Admit that when you stated, “We need to put physical pressure upon those that are causing this problem,” You meant that Dr. Erickson should have physical pressure applied to her.

REQUEST FOR ADMISSION NO. 53: Admit that when you stated, “We need to put physical pressure upon those that are causing this problem,” You meant that NP Jungman should have physical pressure applied to her.

REQUEST FOR ADMISSION NO. 54: Admit that You directed people to call St. Luke's in order to disrupt St. Luke's business.

REQUEST FOR ADMISSION NO. 55: Admit that You directed people to call St. Luke's to threaten St. Luke's staff.

REQUEST FOR ADMISSION NO. 56: Admit that You authorized the posting of a video including statements from You https://www.youtube.com/watch?v=q_xwlay4mbU on March 13, 2022 titled "Frightening update on baby Cyrus".

REQUEST FOR ADMISSION NO. 57: Admit that You stated, "We have to make sure that we do what it takes to make sure that this doesn't continue much longer. I don't know if we'll have to go to whatever level. But this cannot go on."

REQUEST FOR ADMISSION NO. 58: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=OT8ZsLgwl0k> on March 12, 2022 titled "Update on baby Cyrus".

REQUEST FOR ADMISSION NO. 59: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=qpGQhQtwdzw> on March 12, 2022 titled "They arrested baby Cyrus' mother last night too".

REQUEST FOR ADMISSION NO. 60: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=CRMIPgSwuMQ> on March 18, 2022 titled "You will not take our children away! -Update Baby Cyrus".

REQUEST FOR ADMISSION NO. 61: Admit that on March 15, 2022, You addressed "patriot groups across the country" and said that You "cannot hold [them] back any longer."

REQUEST FOR ADMISSION NO. 62: Admit that when You said You "cannot hold [the patriot groups] back any longer," You were addressing groups that included militia groups.

REQUEST FOR ADMISSION NO. 63: Admit that when You said You “cannot hold [the patriot groups] back any longer,” You meant that those who heard your statement should use force to ensure the Infant was returned to his parents.

REQUEST FOR ADMISSION NO. 64: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=MaRScsCK210> on March 12, 2022 titled “Idaho CPS Took Baby Cyrus”.

REQUEST FOR ADMISSION NO. 65: Admit that You authorized the posting of a video including statements from You at <https://www.youtube.com/watch?v=1FN9NBYrijY> on March 15, 2022 titled “Emergency Message Cyrus”.

REQUEST FOR ADMISSION NO. 66: Admit that You entered the ambulance bay at St. Luke’s Meridian on March 12, 2022.

REQUEST FOR ADMISSION NO. 67: Admit that You were not seeking medical care or treatment when You entered the ambulance bay at St. Luke’s Meridian on March 12, 2022.

REQUEST FOR ADMISSION NO. 68: Admit that hospital staff asked You to move from the ambulance bay at St. Luke’s Meridian on March 12, 2022.

REQUEST FOR ADMISSION NO. 69: Admit that one or more law enforcement officers asked You to move from the ambulance bay at St. Luke’s Meridian on March 12, 2022.

REQUEST FOR ADMISSION NO. 70: Admit that You refused to move from the ambulance bay at St. Luke’s Meridian on March 12, 2022.

REQUEST FOR ADMISSION NO. 71: Admit that You intended to disrupt St. Luke’s business on March 12, 2022.

REQUEST FOR ADMISSION NO. 72: Admit that You were present at St. Luke's Boise during the period March 12, 2022 through March 17, 2022.

REQUEST FOR ADMISSION NO. 73: Admit that You directed others to go to St. Luke's Boise during the period March 12, 2022 through March 17, 2022.

REQUEST FOR ADMISSION NO. 74: Admit that You were at St. Luke's Boise on March 15, 2022 to protest.

REQUEST FOR ADMISSION NO. 75: Admit that You directed others to go to St. Luke's Boise on March 15, 2022 to protest.

REQUEST FOR ADMISSION NO. 76: Admit that You directed members of People's Rights Network to go to St. Luke's Boise on March 15, 2022 to protest.

REQUEST FOR ADMISSION NO. 77: Admit that members of People's Rights Network were present at the protests at St. Luke's Boise on March 15, 2022 at Your direction.

REQUEST FOR ADMISSION NO. 78: Admit that there were hundreds of protestors at St. Luke's Boise on March 15, 2022.

REQUEST FOR ADMISSION NO. 79: Admit that You caused hundreds of individuals to go to St. Luke's Boise on March 15, 2022 to protest.

REQUEST FOR ADMISSION NO. 80: Admit that some of the protestors at St. Luke's Boise on March 15, 2022 had firearms on their persons during the protest.

REQUEST FOR ADMISSION NO. 81: Admit that the protestors at St. Luke's Boise looked to You for direction on what to do.

REQUEST FOR ADMISSION NO. 82: Admit that You coordinated with Defendant Rodriguez regarding how to direct the protestors at St. Luke's Boise.

REQUEST FOR ADMISSION NO. 83: Admit that the protestors caused a lockdown at St. Luke's during the afternoon hours on March 15, 2022.

REQUEST FOR ADMISSION NO. 84: Admit that some of the protestors attempted to break into St. Luke's Boise on March 15, 2022 when the hospital was locked down.

REQUEST FOR ADMISSION NO. 85: Admit that You intended to disrupt St. Luke's operations on March 15, 2022.

REQUEST FOR ADMISSION NO. 86: Admit that You directed others to be present at the protests at St. Luke's Boise on March 15, 2022 because You wanted them to disrupt St. Luke's business.

REQUEST FOR ADMISSION NO. 87: Admit that You directed others to be present at the protests at St. Luke's Boise on March 15, 2022 because You wanted them to threaten Mr. Roth.

REQUEST FOR ADMISSION NO. 88: Admit that You directed others to be present at the protests at St. Luke's Boise on March 15, 2022 because You wanted them to threaten Dr. Erickson.

REQUEST FOR ADMISSION NO. 89: Admit that You directed others to be present at the protests at St. Luke's Boise on March 15, 2022 because You wanted them to threaten NP Jungman.

REQUEST FOR ADMISSION NO. 90: Admit that You directed others to be present at the protests at St. Luke's Boise on March 15, 2022 because You wanted them to take the Infant by force.

REQUEST FOR ADMISSION NO. 91: Admit that You publicly stated that Mr. Roth personally profits from child trafficking.

REQUEST FOR ADMISSION NO. 92: Admit that You publicly stated that Mr. Roth personally profits from kidnapping.

REQUEST FOR ADMISSION NO. 93: Admit that You publicly stated that Mr. Roth personally profited from St. Luke's providing treatment to the Infant while the Infant was in DHW custody.

REQUEST FOR ADMISSION NO. 94: Admit that You publicly called Dr. Erickson a criminal.

REQUEST FOR ADMISSION NO. 95: Admit that You publicly accused Dr. Erickson of being incompetent at her trade or profession.

REQUEST FOR ADMISSION NO. 96: Admit that You publicly accused NP Jungman of being incompetent at her trade or profession.

REQUEST FOR ADMISSION NO. 97: Admit that You publicly accused St. Luke's of being incompetent at its trade or profession.

REQUEST FOR ADMISSION NO. 98: Admit that You publicly accused St. Luke's of kidnapping children.

REQUEST FOR ADMISSION NO. 99: Admit that You publicly accused Mr. Roth of kidnapping children.

REQUEST FOR ADMISSION NO. 100: Admit that You publicly accused Dr. Erickson of kidnapping children.

REQUEST FOR ADMISSION NO. 101: Admit that You publicly accused Dr. Erickson of kidnapping "hundreds of children."

REQUEST FOR ADMISSION NO. 102: Admit that You publicly accused NP Jungman of kidnapping children.

REQUEST FOR ADMISSION NO. 103: Admit that You publicly accused St. Luke's of participating in a child trafficking ring.

REQUEST FOR ADMISSION NO. 104: Admit that You publicly accused Mr. Roth of participating in a child trafficking ring.

REQUEST FOR ADMISSION NO. 105: Admit that You publicly accused Dr. Erickson of participating in a child trafficking ring.

REQUEST FOR ADMISSION NO. 106: Admit that You publicly accused NP Jungman of participating in a child trafficking ring.

REQUEST FOR ADMISSION NO. 107: Admit that You coordinated with Defendant Rodriguez regarding messaging and communications relating to the statements You made about Plaintiffs' treatment of the Infant.

REQUEST FOR ADMISSION NO. 108: Admit that You coordinated with Defendant Freedom Man Press LLC regarding messaging and communications relating to the statements You made about Plaintiffs' treatment of the Infant.

REQUEST FOR ADMISSION NO. 109: Admit that You coordinated with Defendant Freedom Man PAC regarding messaging and communications relating to the statements You made about Plaintiffs' treatment of the Infant.

REQUEST FOR ADMISSION NO. 110: Admit that You knew at least from March 12, 2022 onward that St. Luke's did not have the legal authority to make any decisions about the Infant's custody.

REQUEST FOR ADMISSION NO. 111: Admit that You knew at least from March 12, 2022 onward that St. Luke's was providing necessary medical care to the Infant in March 2022.

REQUEST FOR ADMISSION NO. 112: Admit that You knew that the statements You made about St. Luke’s would cause it reputational harm.

REQUEST FOR ADMISSION NO. 113: Admit that You knew that stating Mr. Roth was a “criminal accessory” would cause him reputational harm.

REQUEST FOR ADMISSION NO. 114: Admit that You knew calling Dr. Erickson a “criminal” would cause her reputational harm.

REQUEST FOR ADMISSION NO. 115: Admit that You approved the doxing of Chris Roth.

REQUEST FOR ADMISSION NO. 116: Admit that You approved the doxing of Dr. Natasha Erickson.

REQUEST FOR ADMISSION NO. 117: Admit that You approved the doxing of NP Tracy Jungman.

REQUEST FOR ADMISSION NO. 118: Admit that You directed Defendant Diego Rodriguez to dox Chris Roth.

REQUEST FOR ADMISSION NO. 119: Admit that You directed Defendant Diego Rodriguez to dox Dr. Natasha Erickson.

REQUEST FOR ADMISSION NO. 120: Admit that You directed Defendant Diego Rodriguez to dox NP Tracy Jungman.

REQUEST FOR ADMISSION NO. 121: Admit that You directed Defendant Freedom Man Press LLC to dox Chris Roth.

REQUEST FOR ADMISSION NO. 122: Admit that You directed Defendant Freedom Man Press LLC to dox Dr. Natasha Erickson.

REQUEST FOR ADMISSION NO. 123: Admit that You directed Defendant Freedom Man Press LLC to dox NP Tracy Jungman.

REQUEST FOR ADMISSION NO. 124: Admit that You directed Defendant Freedom Man PAC to dox Chris Roth.

REQUEST FOR ADMISSION NO. 125: Admit that You directed Defendant Freedom Man PAC to dox Dr. Natasha Erickson.

REQUEST FOR ADMISSION NO. 126: Admit that You directed Defendant Freedom Man PAC to dox NP Tracy Jungman.

REQUEST FOR ADMISSION NO. 127: Admit that You directed Your followers to dox Chris Roth.

REQUEST FOR ADMISSION NO. 128: Admit that You directed Your followers to dox Dr. Natasha Erickson.

REQUEST FOR ADMISSION NO. 129: Admit that You directed Your followers to dox NP Tracy Jungman.

REQUEST FOR ADMISSION NO. 130: Admit that You knew that doxing Plaintiffs would cause them anxiety or other emotional harm.

REQUEST FOR ADMISSION NO. 131: Admit that You knew that doxing Plaintiffs would threaten their safety.

REQUEST FOR ADMISSION NO. 132: Admit that You have ownership interest in Abish-husbondi Inc.

REQUEST FOR ADMISSION NO. 133: Admit that You have a controlling interest in Abish-husbondi Inc.

REQUEST FOR ADMISSION NO. 134: Admit that You direct the actions of Abish-husbandi Inc.

REQUEST FOR ADMISSION NO. 135: Admit that You have ownership interest in Dono Custos, Inc.

REQUEST FOR ADMISSION NO. 136: Admit that You have a controlling interest in Dono Custos, Inc.

REQUEST FOR ADMISSION NO. 137: Admit that You direct the actions of Dono Custos, Inc.

REQUEST FOR ADMISSION NO. 138: Admit that You used Your participation in the March 2022 protests at St. Luke's to increase Your own political influence.

REQUEST FOR ADMISSION NO. 139: Admit that You used Your participation in the March 2022 protests in order to enhance your public reputation.

REQUEST FOR ADMISSION NO. 140: Admit that You used Your participation in the March 2022 protests at St. Luke's for Your campaign advertising.

REQUEST FOR ADMISSION NO. 141: Admit that You used Your participation in the March 2022 protests at St. Luke's to advance Your fundraising efforts for Your campaign.

REQUEST FOR ADMISSION NO. 142: Admit that You used Your participation in the March 2022 protests at St. Luke's to increase interest in Ammon Bundy for Governor.

REQUEST FOR ADMISSION NO. 143: Admit that You used Your arrest at St. Luke's Meridian to generate media attention for Yourself.

REQUEST FOR ADMISSION NO. 144: Admit that You used Your arrest at St. Luke's Meridian to increase interest in Ammon Bundy for Governor.

REQUEST FOR ADMISSION NO. 145: Admit that You are aware of all filings made in the above-captioned lawsuit.

REQUEST FOR ADMISSION NO. 146: Admit that You stated that you will not participate in the above-captioned lawsuit.

REQUEST FOR ADMISSION NO. 147: Admit that You do not intend to participate in the above-captioned lawsuit.

REQUEST FOR ADMISSION NO. 148: Admit that You stated that you will not follow the court's orders entered in the above-captioned lawsuit.

REQUEST FOR ADMISSION NO. 149: Admit that You do not intend to follow the court's orders entered in the above-captioned lawsuit.

REQUEST FOR ADMISSION NO. 150: Admit that You never believed that the Infant was being harmed by Dr. Erickson.

REQUEST FOR ADMISSION NO. 151: Admit that You have no evidence that the Infant was harmed by Dr. Erickson.

REQUEST FOR ADMISSION NO. 152: Admit that You never believed that the Infant was being harmed by NP Jungman.

REQUEST FOR ADMISSION NO. 153: Admit that You have no evidence that the Infant was harmed by NP Jungman.

REQUEST FOR ADMISSION NO. 154: Admit that You knew that your statements and actions created a risk that one of your followers would commit a violent act against Dr. Erickson.

REQUEST FOR ADMISSION NO. 155: Admit that You knew that your statements and actions created a risk that one of your followers would commit a violent act against NP Jungman.

REQUEST FOR ADMISSION NO. 156: Admit that You knew that your statements and actions created a risk that one of your followers would commit a violent act against Chris Roth.

REQUEST FOR ADMISSION NO. 157: Admit that You made statements on social media with the intention that your statements would incite others to commit violent acts against Dr. Erickson.

REQUEST FOR ADMISSION NO. 158: Admit that You made statements on social media with the intention that your statements would incite others to commit violent acts against NP Jungman.

REQUEST FOR ADMISSION NO. 159: Admit that You made statements on social media with the intention that your statements would incite others to commit violent acts against Chris Roth.

DATED: November 29, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham
Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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