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Counsel for Plaintiffs

**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

**DECLARATION OF DR. JAMIE PRICE
IN SUPPORT OF MOTIONS FOR
LEAVE TO AMEND COMPLAINT TO
ALLEGE PUNITIVE DAMAGES**

FILED UNDER SEAL

I, Dr. Jamie Price, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am a Pediatric Hospitalist for St. Luke's Children's Hospital in Boise, Idaho,

where I have worked since 2010.

**DECLARATION OF DR. JAMIE PRICE IN SUPPORT OF MOTIONS FOR
LEAVE TO AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES - 1**

3. I am Board Certified in Pediatrics and Pediatric Hospitalist Medicine by the American Board of Pediatrics.

4. In my daily work, I care for children admitted to the hospital for neglect and abuse. I also regularly care for children who are experiencing failure to thrive.

5. I was working the day after the infant involved in this matter (“Infant”) was admitted to St. Luke’s, March 12, 2022. When I first assessed the Infant’s status, I observed that the Infant was sleepy, somnolent, and seemed dehydrated. Labs completed in the ER prior to admission including an elevated BUN and AST (kidney and liver labs that can rise in response to dehydration) supported these clinical findings. Since the Infant’s discharge on March 4, 2022, the Infant had lost 265 grams.

6. As the Infant had tolerated a bottle in the ER prior to admission, we allowed the Infant to eat orally, but the Infant did not take anything by mouth following that initial bottle in the ER. Our team placed an IV to address the Infant’s dehydration. The Infant’s total caloric intake the first day was not sufficient for the Infant to gain weight or to rehydrate absent an IV. The Infant took minimal amounts orally initially and did have gagging on the bottle as well as some small spit ups. When a child is admitted for failure to thrive, it is often my practice to take photographs of the child at the time of admission so that his or her progress, weight, and health may be closely monitored and documented while under St. Luke’s care. Photographs of the Infant around the time of admission were taken by the CARES team, Dr. Matt Cox and Tracy Jungman, NP. True and accurate copies of these photographs are attached as **Exhibit A**.

7. During the course of the Infant’s admission at St. Luke’s, I spoke with the Infant’s parents on a few occasions. During these conversations, I did not provide my name to the parents. I chose not to provide my name because of the volatile situation and the potential that I

could be doxed by Ammon Bundy, Diego Rodriguez, or their supporting entities. I was worried about potential harassment of my family. However, I did provide them all of my credentials. The parents continued to ask for my name. When I explained I was not comfortable providing it under the circumstances, the mother told me: “You don’t have anything to worry about as long as you don’t hurt our baby.” They also had a “patient advocate” with them on at least one of the calls who interrupted me and said they didn’t need to know my credentials. Even with other tense Child Protective Services (CPS) situations, I have never felt threatened like that. The Infant’s parents did have good questions. But they also seemed like they’d been coached in their approach to the conversations with me. It was a difficult situation and was the first time in my career that I did not provide my name to a family.

8. When talking with the Infant’s parents, I was fully transparent about the care that had been provided to the Infant—the hydration and lab tests. I also advised them that the Infant was not taking enough formula or breast milk by mouth to gain appropriate weight, and that, under the circumstances, a feeding tube should be placed so the Infant could gain necessary weight. The parents did not consent to the placement of a feeding tube at first. Later, they “consented under duress” because the Infant was still not taking enough food by mouth.

9. After I provided updates the first two days, another doctor on our staff kindly agreed to provide updates so I could focus on care of the Infant and my other child patients. Because of the situation with the protests, it took hours to provide information to the Infant’s parents. The most frustrating thing about my interactions with the family was that I genuinely felt that the threats and outward manipulation of facts were counterproductive. St. Luke’s was giving the Infant quality care, but the family was making that harder. The hospital had to expend

enormous resources in dealing with the protestors, the false information spread by Bundy and Rodriguez, and the threat to the hospital and everyone in it.

10. While our team at St. Luke's was caring for the Infant (and all of our other patients), protestors tied to Bundy and Rodriguez were flooding the St. Luke's phone call-in center. These calls prevented patients from being able to reach their care providers with questions or make appointments. Over that weekend, we also had political representatives coming to us telling us how to manage the care of the Infant. Due to our desire to maintain privacy, as is our duty under federal law, the medical staff could not respond to those who would offer unsolicited advice on the care of the Infant. These political representatives were not related to the Infant and were not medical professionals. It was quite distressing to the medical team to have elected officials get involved and not support those of us that are trained providers. Protesters were also physically stationed outside the hospital. Many of the protestors were carrying signs. I remember one sign that claimed St. Luke's was trafficking 2,000 kids a month. To avoid possible confrontation, I wore plain clothes in and out of the building and did not wear my name badge outside the hospital. I changed the location where I parked my car. I arrived early and stayed late, which further took time away from my family and children. The security team walked me out to my car during the days of the protests. Even with all these changes, I still felt that my safety was at risk and lived in a state of anxiety during the days of the protests and for many weeks after.

11. Inside the hospital, our team took steps to secure staff safety in our facilities including taking down signs and covering up information posted on walls or doors that identified our offices. At one point, I became aware of a relative to a patient who would leave the bedside, go join the protestors, and then return inside to resume sitting with his child. This was quite

anxiety provoking because this person could have been providing the protestors with information about our security procedures.

12. I was at work when St. Luke's made the decision to lock down the hospital on March 15, 2022 at the height of the protests. What was remarkable to me was that the protestors were willing to put the lives of the medical staff, all the child patients, and their families at risk. Many of the protestors were openly carrying guns. They were aggressive toward staff members coming and going from the entrance. The fear that we would not be able to protect not only ourselves but the numerous sick, young children both on the general pediatric floor and the pediatric oncology unit was intense. The location of the Infant on the unit had not been released to the family, so those that were trying to infiltrate the hospital would have had to search every room to find the Infant. The potential that it could turn into an active shooter situation was utterly terrifying. I could not believe that it was all happening and still can't believe it to this day.

13. I have three young children. I asked my husband not to allow them to play outside our home during the days of the protests at St. Luke's. One of my children asked me: "Is this about Baby Cyrus?" They knew about the situation at St. Luke's without me telling them because they had seen the protestors outside, it was on the news—the information about the accusations of Bundy, Rodriguez, and their entities were all online. During the days of the protests, my husband also spoke with the chief of St. Luke's security about possible measures to further secure our home and protect ourselves in the event my name was made available to the people and entities inciting the protests. We told our neighbors about the situation and asked them to call the police if they saw anything strange around our house.

14. The Infant was discharged on March 15, 2022. I was not scheduled to work on the 15th. However, given the circumstances around the Infant's admission, I felt I should protect the other providers in my group from their involvement. I went in because I had been the provider in charge of the Infant's care throughout his admission. This is a change from our standard practice where providers go off service and hand all patients off to the oncoming provider. In this case, I had spent many hours in addition to my scheduled hours in order to provide care to the Infant, while still caring for many other patients. I came in only for the discharge of the Infant so that the oncoming physician could care for the rest of the patients.

15. At discharge, the Infant's condition was greatly improved from his condition at admission just a few days prior. The Infant was happy, playful, and hydrated. I took a photo of the Infant at the time of his discharge. The Infant's weight was up 390 grams (just above 6%) from admission. A true and accurate copy of the photograph I took on March 15, 2022 is attached as **Exhibit B**.

16. I understand that Bundy and Rodriguez have stated or implied that St. Luke's vaccinated the Infant without consent of the Infant's parents. This is false. St. Luke's did not vaccinate the Infant. I understand that Rodriguez has stated or implied that St. Luke's performed unnecessary medical tests and treatments on the Infant, unnecessarily extending the Infant's time at the hospital to increase costs and extorting the Infant's parents. This is false. The medical treatment provided was necessary and performed in the best interest of the Infant.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 5th day of December, 2022.

/s/ Dr. Jamie Price

DR. JAMIE PRICE

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2022, I caused to be filed and served, via iCourt, 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

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☒ Overnight Mail
- ☐ Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☒ Overnight Mail
- ☐ Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☒ Overnight Mail
- ☐ Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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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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PRICE DECLARATION
EXHIBIT A

03/12/2022 - ED to Hosp-Admission (Discharged) in Boise Pediatrics (continued)

All Encounter Notes (group 1 of 3) (continued)

Primary caregiver at home: mother
Drug/Alcohol use: unknown
Day care: no
Maternal employment: no
Paternal employment: unknown

Social worker present for evaluation: No, discussed in detail with Brianne.

Physical Examination:

BP 99/56 (BP Location: Right leg, Patient Position: Lying) | Pulse 100 | Temp 36.9 °C (98.5 °F) (Axillary) | Resp 28 | Ht 71.5 cm (28.15") | Wt 6.28 kg (13 lb 13.5 oz) | HC 45 cm (17.72") | SpO2 99% | BMI 12.28 kg/m²

GENERAL: Somnolent, falls asleep when left undisturbed, arouses without difficulty, cachectic, thin appearing

HEENT: Ears: well-positioned, well-formed pinnae. pearly TM, Mouth: Normal tongue, palate intact, Neck: normal structure, Nose and sinus: Nose: small amount of dried, yellow secretions in right nare discharge

NECK: Normal, supple

LUNGS: Normal respiratory effort. Lungs clear to auscultation

HEART: Normal PMI, regular rate & rhythm, normal S1,S2, no murmurs, rubs, or gallops

ABDOMEN: Soft, Nontender, No organomegaly

MUSCULOSKELETAL: Poor muscle bulk

NEUROLOGIC: Intermittently listless, poor tone, significant head lag

GENITOURINARY: Normal Tanner 1 male genitalia, urine bag in place

SKIN: Decreased skin turgor, ribs and spine visibly protruding, area of discoloration (slight hyperpigmentation) on right lateral/posterior lower ribcage



03/12/2022 - ED to Hosp-Admission (Discharged) in Boise Pediatrics (continued)

All Encounter Notes (group 1 of 3) (continued)



Laboratory Studies:

Recent Results (from the past 24 hour(s))

CBC

Collection Time: 03/12/22 1:24 AM

Result	Value	Ref Range
WBC COUNT	9.32	5.50 - 18.00 10 ³ /uL
RBC COUNT	4.34	3.50 - 5.50 10 ⁶ /uL
HEMOGLOBIN	12.3	10.5 - 13.5 g/dL

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PRICE DECLARATION
EXHIBIT B

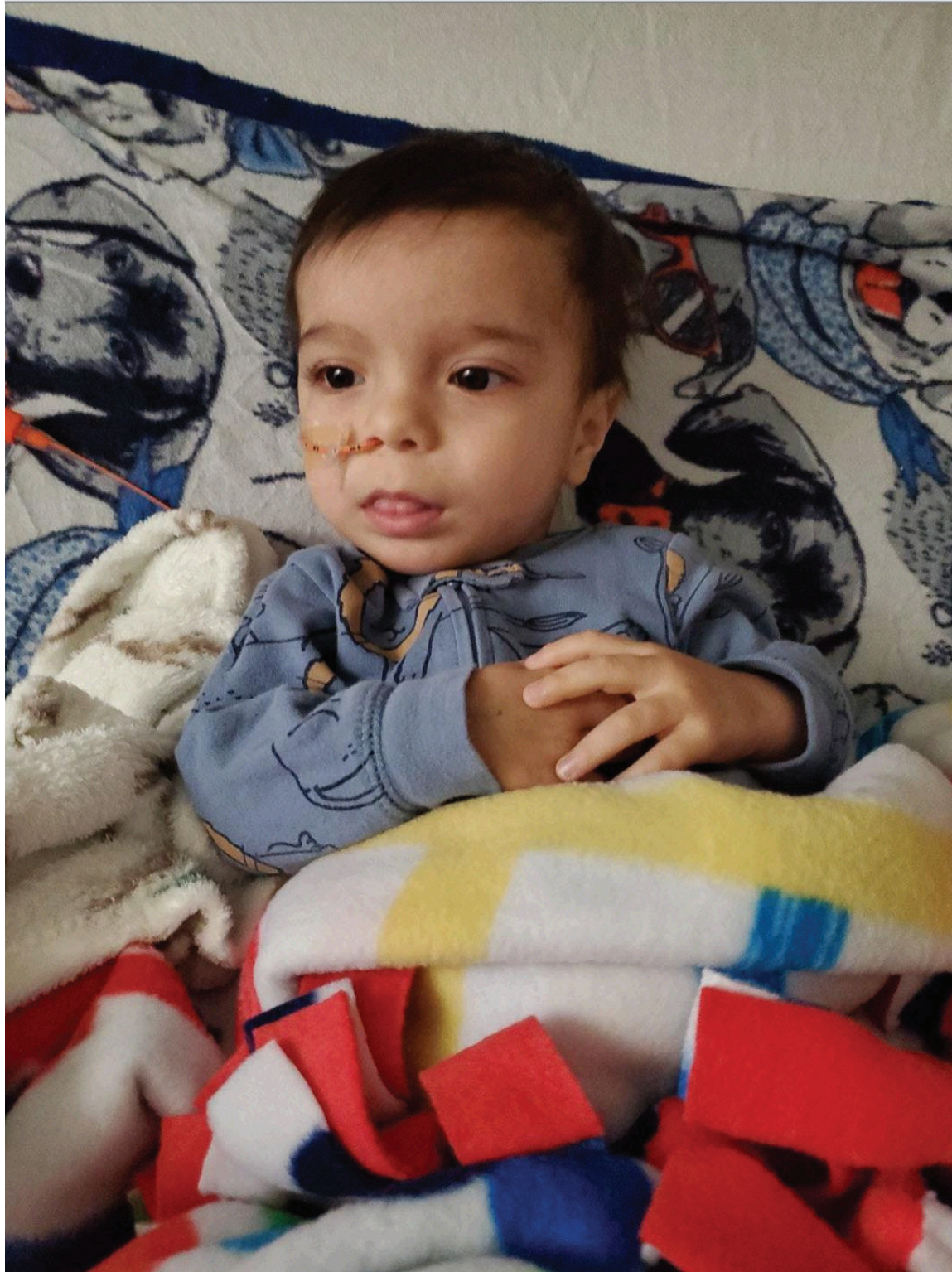
03/12/2022 - ED to Hosp-Admission (Discharged) in Boise Pediatrics (continued)

All Encounter Notes (group 3 of 3) (continued)



03/12/2022 - ED to Hosp-Admission (Discharged) in Boise Pediatrics (continued)

All Encounter Notes (group 3 of 3) (continued)



Images above take on morning of discharge.