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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 DONN ENGLISH IN
SUPPORT OF MOTIONS FOR LEAVE
TO AMEND COMPLAINT TO ALLEGE
PUNITIVE DAMAGES**

I, Donn English, declare and state as follows:

1. I am Tracy Jungman's life partner and a resident of Boise, Idaho. I make this declaration based on my personal knowledge.

2. I have known Tracy for about five years. She is a positive, happy, supportive person who puts her family first.

3. I understand that Tracy provided medical care for an infant (“Infant”) who became the focus of protests that eventually caused a lockdown of St. Luke’s Boise Medical Center (“St. Luke’s Boise”) on March 15, 2022.

4. In the few days leading up to the lockdown and for a few days after, I understand that Tracy was providing care for the Infant. Due to the armed protesters at the hospital, who we understood had been called there by Ammon Bundy and Diego Rodriguez, Tracy and I were concerned that there would be an incident of violence directed at her or that armed protesters would show up at our home. I understand that for safety reasons meetings between the Infant and the Infant’s parents were conducted at a location away from the hospital. When Tracy attended those meetings, we were concerned that armed protesters would show up or that Tracy would otherwise be threatened by Ammon Bundy and Diego Rodriguez’s followers. Because of this concern, I drove Tracy to the appointments with the Infant’s parents and would drop her off a short distance away so that any followers would not see or take note of our vehicle or license plates. I would then wait for her to contact me, and I would meet her and walk her to our car which I would park several blocks away. We took this precaution for her safety and the safety of our family. Every time I drove her to one of these appointments, Tracy and I had anxiety and felt tense, waiting to see if protesters would show up, or if anyone from Bundy’s or Rodriguez’s camp would threaten her. Fortunately, no violent act occurred. But the tension was ever present.

5. I understand that Rodriguez doxed Tracy. Even after the lockdown, Rodriguez has continued to post lies about Tracy on freedomman.org. It is frustrating and worrisome to Tracy

and to me. We do not know whether Rodriguez's lies will incite someone to act out in violence against Tracy. I know she worries for her children.

6. Some nights she can't sleep due to the distress from Bundy's and Rodriguez's actions. She often wakes up and checks that all the doors in the house are locked, something she never used to do before she was doxed. She also has nightmares. I worry for her emotional well-being. She is a very strong person, but I don't think anyone could remain unaffected by the Defendants' wrongful actions.

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

Executed this 7th day of November, 2022.



DONN ENGLISH

CERTIFICATE OF SERVICE

I hereby certify that on this 6th 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

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Ammon Bundy
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- Email/iCourt/eServe:

People's Rights Network
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Emmett, ID 83617-3601

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Freedom Man Press LLC
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Orlando, FL 32804

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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