

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

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 JEFFREY
ERICKSON IN SUPPORT OF
MOTIONS FOR LEAVE TO AMEND
COMPLAINT TO ALLEGE PUNITIVE
DAMAGES**

I, Jeffrey Erickson, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am married to Natasha D. Erickson, M.D., who is a pediatric physician at the St.

Luke's Regional Medical Center in Boise, Idaho, and a Plaintiff in this action.

**DECLARATION OF JEFFREY ERICKSON IN SUPPORT OF MOTIONS FOR
LEAVE TO AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES - 1**

3. I have known Natasha since around 2001 when we started dating. We are married and have two children. She is a very caring person. She puts other people first and is a person who tends to take care of things so others do not need to worry about them.

4. Natasha loves her career as a pediatrician. She is very smart and professional. She has always wanted to be a doctor. She decided to go into pediatrics when she was in medical school. She has been working with child-aged patients since that time.

5. As her husband I am aware of the normal day-to-day stress of her occupation. She often treats abused and neglected children. Although it could sometimes be demanding and tiring, she was able to let the stress go when she was at home.

6. She also has relationships with her child patients' parents. A lot of the time the parents are really caring but just are not in the right place in life or do not have the ability to properly care for their child. Sometimes parents are difficult, but Natasha has never experienced anything like what she did earlier this year related to the infant. No parent or family has ever made any threat or intimidated Natasha until this situation.

7. When Natasha was doxed by Ammon Bundy, Diego Rodriguez, and their entities she became worried all the time about what could potentially happen. The situation consumed her—she thought about it all the time and would look online for new posts mentioning her or St. Luke's. During that initial period the situation with the doxing and the potential threats was all we really talked about. It was really frustrating because the misinformation and lies about the infant's care can not be refuted because of the reality of violating HIPPA.

8. We had undercover cops show up at our house in the initial period after the doxing began. We did not let the kids play outside for a period of time. We also alerted our neighbors of the situation and it affected them as well. We constantly made sure our front blinds were closed and that our doors were locked. We had security cameras installed—we never had

them before and now they run all the time. I took some time off work in the initial period to be home. Natasha and I also started checking in with each other when she left and arrived at work—she would let me know when she made it safely inside the hospital building.

9. The experience also completely changed what Natasha thought she wanted to be—in terms of her career as a pediatrician. It affected her both at home and at work. There have been multiple occasions where she has come home completely shut down because of the threat.

10. The experience has changed the way we use social media—we don't share anything online with anyone we do not directly know. It also changed the way Natasha feels about interactions with the community. I remember when she went to get a tire changed on her car and they asked for her name she was worried about giving it out because you never know who might be a supporter. She also decided not to volunteer at our church in the nursery, just because of the impact it could potentially have on the church.

11. Natasha is still worried about what could happen. I see it impacts her quite a bit every day. A couple of nights ago she had constant dreams about it. Our kids are also aware of it too even though I think we did a good job of insulating them from our worry and stress. Its in our nine-year-old's mind. Whenever he sees a "Bundy" campaign sign he mentions it.

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.


JEFFREY ERICKSON

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

- 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

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- 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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- 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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