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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 JESSICA FLYNN IN  
SUPPORT OF MOTION FOR LEAVE  
TO AMEND COMPLAINT TO ALLEGE  
PUNITIVE DAMAGES**

I, Jessica Flynn, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am the founder, CEO and majority partner of the PR and marketing agency Red

Sky, Inc.; which has been in operation since 2008 and has served approximately 300 clients since inception. It is based in Boise, Idaho.

**DECLARATION OF JESSICA FLYNN IN SUPPORT OF MOTION FOR LEAVE  
TO AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES - 1**

3. I hold a Bachelor of Journalism degree from the University of Texas at Austin and worked for seven years as a broadcast news producer and newsroom leader in Austin, Texas (Designated Market Area/DMA 38), Pittsburgh, Pennsylvania (DMA 26), and Boise, Idaho (DMA 101).

4. I am a recognized strategic communication expert and Croft Society member who leads an agency team of eight communication professionals who provide expertise in areas including public relations, integrated marketing, stakeholder communication, issues management, influencer engagement, digital marketing, internal communication, public affairs, social media, media relations, and content development.

5. I am a consultant and coach for executive leaders and companies in the public and private sectors across the country, providing public speaking, media and messaging, reputation management, and crisis communication counsel.

6. I am providing this declaration regarding my opinions, based on more than two decades of professional communication experience and 16 years of agency-specific PR experience that includes a deep understanding of strategic messaging, reputation management, communication channels, and audience engagement tactics; that the defendants initiated and sustained a highly coordinated public awareness campaign designed for personal and collective gain while damaging the reputation of the plaintiffs.

7. Sources of information that I reviewed to date include the following documents and references:

- a. Amended Complaint and Demand for Jury Trial in this matter, dated 06/02/2022, including a sample of some of the many postings and statements made about St. Luke's, Dr. Erickson and Ms. Jungman.
- b. Declaration of Natasha Erickson, MD in Support of Motion for Leave to Amend Complaint to Allege Punitive Damages dated November 8, 2022;

- c. Declaration of NP Tracy Jungman in Support of Motion for Leave to Amend Complaint to Allege Punitive Damages dated November 8, 2022;
- d. Postings and several media appearances on the FreedomMan.org website relating to the Infant. <https://freedomman.org/cyrus/>; <https://freedomman.org/cyrus/interviews-and-media/>
- e. Postings on Ammon Bundy for Governor Campaign site and channels
  - a. VoteBundy.com Campaign Videos: *St. Luke's Hospital is suing me. Why I'm not participating in the court process.*  
<https://www.votebundy.com/media/videos/?watch=st-luke-s-hospital-is-suing-me-why-i-m-not-participating-in-the-court-process>
  - b. Video: *Your children do not belong to you!*  
<https://www.youtube.com/watch?v=gfMbo9BR2CE&feature=youtu.be>;  
<https://twitter.com/RealABundy/status/1504345070585069575>
- f. Power Marketing web site <https://powermarketing.net/>
- g. diegorodriguez.org <https://diegorodriguez.org/>

8. Defendants engaged in an intentional, calculated media campaign to damage the reputation of St. Luke's, Mr. Roth, Dr. Erickson, and Nurse Practitioner Tracy Jungman.

9. The defendants developed an awareness campaign designed to maximize the reach of their message for various gains to themselves, their networks, causes and affiliated organizations by disparaging St. Luke's and its caregivers involved in the incident. These efforts generated considerable publicity via coverage by traditional media outlets, were then amplified via their own social platforms and appearances on sympathetic audio and video streaming platforms, which in turn directed back to their online platforms to broaden their audience.

10. The defendants leveraged a well-connected network, combined with conspiracy- or grievance-based narratives with national traction, to further amplify their message and impact reputations. Bundy and Rodriguez acted in concert on messaging. Using remarkable message discipline and coordination between Rodriguez and Bundy, the defendants intentionally conflated St. Luke's and its employees with events and perceived conspiracies outside of St. Luke's influence or control.

11. The defendants took specific steps to disparage St. Luke's and the employees involved in the incident with an assortment of mistruths, intended to impact their business and livelihoods by scaring patients, prospective patients, and families from using their services.

12. The coordinated disparagement campaign and its impact on the plaintiffs is ongoing and extensive. Based on agency experience with awareness and reputation campaigns, it is my opinion that a comprehensive, multi-year reputation campaign will be required to restore the reputations of St. Luke's, Dr. Erickson and NP Jungman in the public eye, given the extensive damages inflicted by the defendants' actions.

These are my opinions based upon the information I have reviewed to date. I reserve the right to amend and update these opinions should additional information be provided.

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

Executed this 2<sup>nd</sup> day of December, 2022

*/s/ Jessica Flynn*

\_\_\_\_\_  
Jessica Flynn

## 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
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- Overnight Mail
- Email/iCourt/eServe:

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

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

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

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Freedom Man Press LLC  
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Boise, ID 83714

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freedommanpress@protonmail.com

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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