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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 JOHN COGGINS  
IN SUPPORT OF MOTIONS FOR  
LEAVE TO AMEND COMPLAINT TO  
ALLEGE PUNITIVE DAMAGES**

I, John Coggins, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am a resident of Idaho, where I live with my wife in the Treasure Valley. We are both retired.

3. I have lived in Idaho since around 1983, with the exception of a few stints spent out of state, including time spent training in the Job Corps.

4. I am a veteran of the U.S. Army. I served from 1982 through 1985, which included time stationed in Korea.

5. I am actively involved in my community. I have coached youth football and baseball teams in the area for decades.

6. On March 7, 2022, my wife was admitted to St. Luke's in Boise, Idaho for a scheduled surgery. She remained at St. Luke's for aftercare until March 23, 2022, including spending several days in the ICU. I went to the hospital every day to spend time with her while she was in inpatient care.

7. On or around March 13, 2022, I became aware of protesters located outside the main tower of the St. Luke's building. I saw the protesters as I came and went from the hospital to visit my wife. I quickly came to understand that the protests related to a child that was in the care of St. Luke's at that time.

8. On my walks to and from the hospital, I heard things the protesters were yelling and amplifying through megaphones. I remember them saying things like, "Give Baby Cyrus back"; "St. Luke's kidnaps children"; "baby killers"; and "Ammon Bundy sent us here." The protesters were also carrying signs that had photos of St. Luke's doctors that read "Murderer" underneath the photos and other signs that accused St. Luke's of child kidnapping and killing people.

9. I saw very few other people who appeared to be going to St. Luke's as patients or visitors of patients. Almost every person I saw when walking to and from the hospital was a protester. I believe that the patients and visitors were frightened and intimidated and avoided St.

Luke's during that period of time if they had any choice. I did not have a choice. My wife was in ICU and could not be moved, and I refused to leave her.

10. The number of protesters increased from March 13, 2022 from just a handful, to about 400 or more people on March 15, 2022.

11. That day, the entrance to the hospital was completely packed with protesters. They were using megaphones to shout at doctors and people walking in and out—sometimes straight into their ears. The protesters were also stationed along the roadway leading into the main tower of the hospital and around the backside. In the time I was outside, I observed at least two cars approach the entrance to the hospital and depart after speaking with the police standing just outside the emergency doors.

12. Because there were so many protesters using the dedicated parking areas for St. Luke's staff and visitors, I had to park by a graveyard memorial area down the street. As I walked to the hospital, I saw that all of the side streets were full of Bundy's people. I saw a truck parked on one side street that had several men in the back holding AR-15s.

13. It was a mob mentality immediately outside the hospital that day. There was always someone screaming. I heard people say things like, "I hope Ammon Bundy lets us loose" and "We are just waiting on go." It was clear Ammon Bundy was in charge and that members of the mob were looking to him for direction.

14. I also observed protesters on the rear side of the building yelling at nurses leaving or entering the building. The protesters were calling them the "c-word" and the "b-word" and "murderer" and "kidnapper."

15. When I was outside the front side of the hospital that day, I saw a person in the crowd of protesters that I recognized. Her name was "Sara Ann." I met her several months prior

when I was part of a counter-protest to the Antifa and Black Lives Matter protesters in downtown Boise.

16. When I approached Sara Ann, she told me that armed militia groups were on their way to the hospital. She said, “We’re going to take that baby back.” Shocked, I asked her if their plan was to go from room to room looking for the baby. She responded: “In every war there’s casualties and Ammon believes it’s a war zone.”

17. After hearing what Sara Ann had to say, I decided to go speak to Ammon Bundy, who I noticed was also there in front of St. Luke’s with the protesters. I said to Bundy, “Are you backing this crazy stuff?” He said, “Yes, they kidnapped Baby Cyrus.”

18. I saw a lot of side arms on the protesters. Every one of the protesters who was near Bundy had a firearm. When I approached Bundy, those people put their hands toward their guns. Before I went back inside, I asked Bundy if he was supporting this and he said, “Absolutely. There’s more to come. This is just the beginning.”

19. Given the volatile situation, I called a friend and asked whether he and some others would be able to come over and park across the street and tell me if people showed up with ARs. My friends did end up coming to help keep a watch on the situation outside while I was inside with my wife.

20. During the time I was at the hospital on March 15th, it was shut down for a period of time to people entering from the outside over security concerns. At one point, I observed hospital staff ask several people to leave from the lobby area. As they were leaving one of the people said something like, “Ammon Bundy sent us here.”

21. The noise from the protesters outside was so loud my wife could hear it from her hospital room. She asked me, “What is all that commotion?”

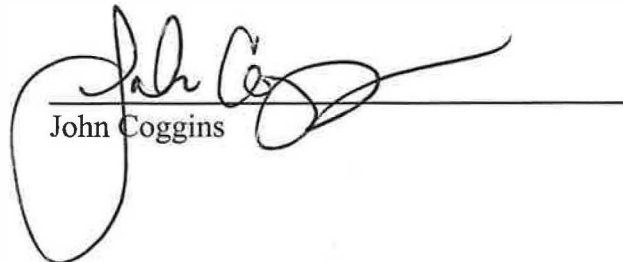
22. It was a very volatile situation. I was genuinely concerned for my wife's safety should the protesters breach the hospital doors and security. Because of that, at some point, I went out to my vehicle and got my handgun—I have a concealed carry. We had a plan that, if the protesters breached the doors, I would put her in a wheelchair, grab an IV, and take a back elevator to get her out of there. I had followed Bundy on YouTube and turned on new notifications for Bundy so I could monitor the situation.

23. Every nurse on my wife's floor was scared. I'm surprised it didn't turn into something really ugly. Given the crowd, I think it could have gone very wrong. It was a real threat. A life and death moment that could have gone sour in an instant. I can't believe I had to conceal at a hospital, where people go to get healed, not hurt.

24. I am providing this declaration because I believe the situation has to be taken utterly seriously. Because how serious are the consequences going to be next time? It's scary to think Bundy can just throw out a YouTube video and get people to come out with AR-15s. Bundy is a public safety risk.

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

Executed this 7<sup>th</sup> day of November, 2022.

  
John Coggins

## 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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People's Rights Network  
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Freedom Man Press LLC  
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1317 Edgewater Dr. #5077  
Orlando, FL 32804

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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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