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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 KATY
ALEXANDER IN SUPPORT OF
MOTIONS FOR LEAVE TO AMEND
COMPLAINT TO ALLEGE PUNITIVE
DAMAGES**

I, Katy Alexander, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. At all times relevant for this declaration, I was the Manager of St. Luke’s Health

System, Ltd.’s (“St. Luke’s”) Transfer Center. The Transfer Center streamlines patient access to St. Luke’s providers and services through a central hub. Its purpose is to connect providers for

consults, admissions, transfers, and placement of patients to the appropriate care area. In the event a St. Luke's facility cannot provide the necessary level of care for a patient, the Transfer Center may be involved in arranging for the patient to be transferred to another facility. As of November 4, 2022, I am no longer the Manager of the Transfer Center, and I have returned to providing direct patient care as a registered nurse.

3. As part of the regular business of the Transfer Center, calls into the Transfer Center are contemporaneously recorded.

4. The recorded calls are ordinarily maintained for a year or more in the normal course of St. Luke's business.

5. As the Manager of the Transfer Center, I supervised all activity in the Transfer Center, including recording calls, archiving calls, and collecting archived calls. On average, the Transfer Center receives approximately 700 calls per day.

6. Attached here as **Exhibit A** is a true and correct copies of recordings from calls into the Transfer Center on March 15, 2022 related to three individuals who had to be diverted away from St. Luke's Boise Medical Center or whose care was delayed that day. Protected health information of the patients has been redacted.

7. The armed protests at the St. Luke's Boise Medical Center facility in downtown Boise on March 15, 2022 that eventually caused the hospital to be on lockdown and divert from approximately 1:00 p.m. to 3:00 p.m. had a significant negative impact on patient care. "Divert" means that emergency transport, such as traditional ground ambulances and Air St. Luke's helicopter ambulance, are directed away from the facility and instructed to go to another facility to find care for a patient.

8. In connection with my work as the Manager of the Transfer Center, I was directly involved with or supervised the routing of care for many patients on March 15. When I think about the impact of the March 15 protests at the St. Luke's Boise Medical Center, three patients in particular come to mind. These patients were all bound for the St. Luke's Boise Medical Center by emergency transport during the time of the March 15 protests where, because the St. Luke's Boise Medical Center was on divert, the patients and their emergency transportation were diverted to other facilities. In all three situations, the patients' safety was put at significant risk because the St. Luke's Boise Medical Center was on divert and could not accept them. First of these patients was a stroke patient who was bound for St. Luke's Boise Medical Center but had to be sent to another facility. Time is of the essence in treating a stroke patient and every minute that care for a stroke patient is delayed can result in life-long loss of function for the patient or death. Next was a 22-month-old infant with multiple acute, serious conditions that would normally go to the Boise campus who was transported to the Magic Valley Emergency Department instead. The third patient was a woman who had gone into labor with twins after only 24 weeks of pregnancy whose care was significantly delayed because the Boise Medical Center was on lockdown. Babies and mothers in that scenario will need highly specialized care if they are going to survive, and St. Luke's Boise Medical Center is one of the few facilities in the State of Idaho that can offer the specialized expertise and facility necessary for such care.

9. I am shocked and disappointed that the recklessness of the protesters and their organizers put the lives and livelihood of these and other patients at risk. I have worked in healthcare for decades, and I cannot recall ever being involved in a scenario where the conduct of a small number of individuals has had such a widespread negative impact on patient care as the conduct of the organizers of the March 15 protests had on patient care.

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/ Katy Alexander

KATY ALEXANDER

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

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

Freedom Man Press LLC
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1317 Edgewater Dr. #5077
Orlando, FL 32804

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Boise, ID 83714

- U.S. Mail
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Orlando, FL 32804

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- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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EXHIBIT A

**AUDIO FILES
PROVIDED ON
FLASHDRIVE**