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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 MARLE HOFF IN
SUPPORT OF MOTIONS FOR LEAVE
TO AMEND COMPLAINT TO ALLEGE
PUNITIVE DAMAGES**

I, Marle Hoff, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am the Chief Operating Officer for St. Luke's Boise Medical Center in Boise,

Idaho. I am a nurse by background and now oversee the operations of St. Luke's Boise campus,

including lab services, medical imaging, environmental services, transport, and volunteers. As part of my job responsibilities, I am sometimes required to respond to emergency situations. We call such responses incident command.

3. On the morning of Saturday, March 12, 2022, a colleague called me at home and informed me that in the early morning hours of that day Ammon Bundy had had a standoff at the St. Luke's Meridian emergency bay over an infant that law enforcement had brought in at the direction of the Idaho Department of Health and Welfare ("DHW"), who had subsequently been moved to St. Luke's Boise Medical Center. Because Ammon Bundy was involved, I was concerned for the safety of the hospital staff and others at St. Luke's. Because this infant had been brought to the hospital under DHW authority, I also was concerned for the health and safety of the child.

4. I immediately went to St. Luke's Boise Medical Center. I set up incident command and alerted other key hospital staff members, including Dennis Mesaros. St. Luke's head of security Abbey Abbondandolo advised and assisted with protecting the hospital and everyone in it.

5. Over the course of the next several days, the protests at St. Luke's Boise Medical Center grew. The size of the crowd reached into the hundreds. Throughout the protests, I occasionally looked out at the crowds. Many were armed. There was always someone shouting. On March 15, 2022, a number of the protesters circled the hospital in a tight caravan, making it difficult for any vehicle or pedestrian to come or go. The protesters were clearly trying to intimidate everyone who saw them and particularly St. Luke's staff. I frequently walked around checking on the medical providers and staff who were on shift, making sure they were okay and

trying to comfort them and keep them calm. It was a terrifying experience. I still suffer from sleeplessness because of this experience with Ammon Bundy's and Diego Rodriguez's mob.

6. In incident command, Abbey kept us apprised of developments in real time. We saw video feeds of angry protesters accusing St. Luke's of kidnapping and murdering children. We watched Ammon Bundy's and Diego Rodriguez's websites, monitoring their postings and videos. I knew that Bundy and Rodriguez had called the protesters to St. Luke's, and I feared that they would command them to do worse things than they already had. I was afraid that the mob would turn violent. It certainly could have happened.

7. During the protests, protesters flooded St. Luke's phone lines, calling to demand that St. Luke's release the infant, even though St. Luke's did not have the authority to do so. The callers used abusive language, cursing at the operators. Attached hereto as **Exhibit A** is a true and correct copy of sample phone calls from protesters. There were so many protesters calling that the operators could not speak with all the callers. Due to the volume of calls, St. Luke's was unable to serve people calling in for legitimate reasons, about their loved ones or other patient care issues. The actions of the protesters, including the jamming of St. Luke's phone lines by callers significantly impacted St. Luke's operations and services during the days of protests.

8. The hospital staff continues to suffer harm from these events. I know that some of my colleagues have sought counseling to deal with the effects on their mental well-being. Staff morale is lower because of the protests, the fear that it could happen again, and the prospect of a worse outcome if it does happen again.

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

Executed this 8th day of November, 2022.

/s/ Marle Hoff
MARLE HOFF

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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Freedom Man Press LLC
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1317 Edgewater Dr. #5077
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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**