

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 WILLIAM
WOODS IN SUPPORT OF MOTIONS
FOR LEAVE TO AMEND COMPLAINT
TO ALLEGE PUNITIVE DAMAGES**

I, William Woods, declare and state as follows:

1. I make this declaration based on my personal knowledge.

2. I am a retired law enforcement officer from Pennsylvania, where I served as an officer for 20 years. My family and I relocated to the Boise area in January 2022, and I began employment with St. Luke's, on its security team around that same time.

3. I was the officer in charge of the shift on March 11, 2022, from 9:00 p.m. to 7:00 a.m. of the following day, at St. Luke's Meridian. Officer Buzzini was also on duty with me. The shift began normally. But in the very early morning hours of March 12th, I received a call from the charge nurse at the emergency department requesting assistance from Officer Buzzini and me because of a disturbance outside the ambulance bay. Officer Buzzini and I responded. I could hear people yelling and screaming before I arrived at the ambulance bay. When I arrived, I saw eight or nine individuals there, yelling about a kidnapped baby. The lead aggressor was a man named Ammon Bundy. He shouted repeatedly that St. Luke's had "kidnapped" an infant and demanded that the infant be returned to its parents. He was loud and demanding and continually interrupted me when I attempted to verbally de-escalate the situation.

4. I'm familiar with protests from my law enforcement career. I know how quickly they can escalate, and I was concerned because more protesters arrived the longer the confrontation continued—all appearing hostile. I was concerned that the protesters might try to force their way into the hospital through the ambulance bay. Due to this concern, Officer Buzzini and I manually closed and secured the ambulance bay door.

5. Even as the crowd was growing in number, I tried to de-escalate the situation by informing the protesters that they could continue their protest on a grassy area away from the ambulance bay so that they would not block incoming emergency vehicles. They refused to move. At that point, law enforcement arrested for trespass Ammon Bundy and a female who also

appeared to be a ringleader. After the two arrests, the remaining protesters moved to the grassy area where I had previously indicated they could remain for their protest.

6. It was a volatile situation. The crowd grew throughout the encounter, and we didn't know how many protesters would show up. Some were on their phones, calling or texting more people to join them. We were concerned that they would escalate the situation to violence, based on how aggressive and hostile they acted and the accusations about "kidnapping" that they made.

7. Because of the volatility of the situation, law enforcement officers from Boise and Meridian arrived at the hospital to assist, keeping watch on entrances and monitoring the crowd. I estimate there were about fourteen officers from Meridian Police Department and nine officers from Boise Police Department.

8. There were moments that night that seemed unreal. I had not expected that I would face a crowd of hostile protesters blocking an ambulance bay of a hospital. It still seems unreal when I look back on it—and outrageous.

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/ William Woods
WILLIAM WOODS

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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- 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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