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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 and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**SUPPLEMENTAL AFFIDAVIT OF
JENNIFER JENSEN IN SUPPORT OF
MOTION FOR CONTEMPT AGAINST
AMMON BUNDY AND PEOPLE'S
RIGHTS NETWORK**

STATE OF IDAHO)
 :SS.
County of ADA)

I, Jennifer Jensen, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. Since the original filing of Plaintiffs’ Motion for Contempt Against Ammon Bundy and People’s Rights Network (“PRN”), Bundy and PRN have continued to broadcast misrepresentations calculated to incite violence, harass, and intimidate the potential witnesses in this case. Taking his talking points to various online platforms, Bundy has increased his campaign against the potential witnesses in response to the Motion for Contempt filed against him and his entity PRN.

3. On or around February 7, 2023, Bundy appeared on The Pete Santilli Show. The show can be found at <https://rumble.com/v28qsci-joint-task-force-and-fbi-easter-raid-thwarted-ammon-bundy.html>. During the show, Bundy states, among other things:

- “I have the ability through People’s Rights to rally, you know, hundreds of thousands of people, in just a short period of time, to a cause, and it terrifies them.” (1:01:45).

4. On or around February 10, 2023, Bundy posted a YouTube video titled “St Lukes Hospital Executives Seek \$7.5 Million & My Arrest.” The video can be found at <https://www.youtube.com/watch?v=R6Asy1zB1oE>. During the video, Bundy states, among other things:

- “I believe that he [Roth] is, you know, was an accessory to child abduction.” (4:00).
- “Natasha Erickson, the doctor who misdiagnosed [Infant] and called CPS, would receive \$1.5M dollars from Diego and I.” (9:20).
- “What did these people do to earn this money, to deserve this money? Well, they participated in taking [Infant] from his loving and caring parents.” (10:00).

5. On or around February 13, 2023, Bundy appeared on The Pete Santilli Show. The show can be found at <https://rumble.com/v29f73o-ammon-bundy-threatened-w-arrest-st.-lukes-hospital-leader-of-covid-death-pr.html>. During the show, Bundy states, among other things:


- “We have a situation here where the courts are being abused by, you know, very wealthy, powerful people to try to crush somebody.” (12:50).
- “I think that judges really believe that, anyway, that they’re just supposed to be what the institutions tell them to be.” (13:40)
- “We are dealing with some very wicked people.” (16:20).
- “I know more now than even when they first took [Infant] of who St. Luke’s executives are and who Holland & Hart executives are—or attorneys are—and they’re flat-out wicked people. I mean flat-out wicked. They basically have no problem taking babies from parents, making money off them, using the State.” (22:55).

6. On or around February 14, 2023, Bundy appeared on John B Wells Live. The show can be found at <https://rumble.com/v29kvv6-ammon-bundy-uncensored-john-b-wells-live.html>. During the show, Bundy states, among other things:

- “This hospital misdiagnosed him and then called CPS, and CPS ultimately took [Infant].” (1:48:00).
- “They misdiagnosed him, but there was really no like, justi—there has been no justification whatsoever at all for them taking this baby.” (1:49:30).
- “These are, in my opinion, very wicked people.” (1:53:10).
- “The St. Luke’s doctor, Natasha Erickson, the one who called CPS, she also is the first one that misdiagnosed [Infant] and caused this whole mess.” (1:55:20).
- “They weren’t worried about his health. They weren’t worri—concerned about him. They were just going to take him from his loving, kind parents and give him to foster parents.” (1:55:45).

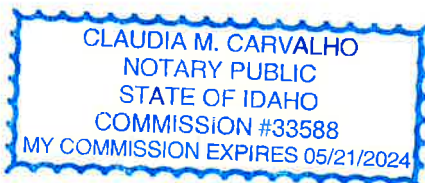
I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 17th day of February, 2023.



 Jennifer Jensen

SUBSCRIBED AND SWORN TO before me this 17th day of February, 2023.





 (Signature of notarial officer)

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2023, 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 via Process Server
- Overnight Mail
- Email/iCourt/eServe:

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Emmett, ID 83617-3601

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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