

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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
jmjensen@hollandhart.com
zmccraney@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

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
NATHAN JONES**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd,

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO NATHAN
JONES - 1**

Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena Duces Tecum in the form attached hereto as “Exhibit A” on **Nathan Jones**. Plaintiffs intend to serve the Subpoena Duces Tecum on April 29, 2023, or as soon thereafter as service may be effectuated.

DATED: April 21, 2023.

HOLLAND & HART LLP

By: */s/ Erik F. Stidham*

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of April, 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
- 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
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- 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

EXHIBIT A

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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
jmjensen@hollandhart.com
zmccraney@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

**SUBPOENA DUCES TECUM TO
NATHAN JONES**

STATE OF IDAHO TO: Nathan Jones
3801 SW 1st Avenue
New Plymouth, Idaho 83655

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case in-person at:

PLACE: Payette County Courthouse
1130 3rd Ave N, Jury Room
Payette, ID 83661

DATE/TIME: May 18, 2023, at 9:00 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

See Exhibit A.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 31, 2023, at 5:00 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: April 29, 2023

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham
Jennifer M. Jensen
Zachery J. McCraney
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2023, I caused to be served 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez	<input type="checkbox"/> U.S. Mail
-----------------	------------------------------------

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/

Erik F. Stidham
OF HOLLAND & HART LLP

21312280_v1

EXHIBIT A

Nathan Jones

1. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about Ammon Bundy from January 1, 2022 to present.
2. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about Ammon Bundy for Governor from January 1, 2022 to present.
3. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about People's Rights Network from January 1, 2022 to present.
4. Please produce all organizational charts and financial statements of or about or concerning People's Rights Network.
5. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of

payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about Abish-husbandi, Inc.

6. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about Dono Custos, Inc, including but not limited to, transactions related to People's Rights Network.
7. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about Diego Rodriguez.
8. Please produce all documents, which includes but is not limited to production of papers and writings of every kind, correspondence, letters, notes, e-mails, text messages, books of account, ledgers, bank statements, promissory notes, invoices, contracts, agreements, articles of organization, documents of organization, statements of salaries, records of compensation paid, employee lists or information, budgets, records of cryptocurrency holdings and transactions, invoices, spreadsheets, statements of account, statements of assets, records of assets held, statements and documents reflecting net worth, records of payment and records of donation, policies, handbooks, and records of transaction to, from, related to, of, or about Freedom Tabernacle, including but not limited to, transactions related to People's Rights Network.
9. Please produce any documents and correspondence, including emails and texts messages about, concerning, or related to St. Luke's Health System, LTD, St. Luke's Regional Medical Center, LTD, Chris Roth, Natasha D. Erickson, M.D., Tracy W. Jungman, and the infant referred to as "Baby Cyrus."
10. Please produce any documents and correspondence, including emails and text messages about, concerning, or related to any law enforcement officer, government employee, prosecutor, social worker, medical care provider, or judge targeted by People's Rights Network for their involvement with or connection to the infant known as "Baby Cyrus."

11. Please produce documents sufficient to describe any messaging systems employed by People's Rights Network and its members for communication.
12. Please produce any documents and correspondence, including emails and text messages about, concerning, or related to communications involving People's Rights Network members, including but not limited to yourself, Ammon Bundy, and Diego Rodriguez, relating to the infant known as "Baby Cyrus."
13. Please produce documents sufficient to show which individuals have authority to remove materials posted by someone other than themselves on the People's Rights Network Website.
14. Please produce any documents and correspondence, including emails and text messages from Ammon Bundy or Diego Rodriguez directed to members of the People's Rights Network from March 1, 2022 to present.
15. Please produce documents sufficient to reflect all assets (including when appropriate account numbers, banking institutions, and cryptocurrency wallets or accounts) owned by the People's Rights Network, including, but not limited to bank accounts, securities, real estate, cryptocurrency wallets, checking accounts, and promissory notes from January 1, 2022 to present.
16. Please produce documents of any meetings involving leaders (including, but not limited, to yourself, Ammon Bundy, and Diego Rodriguez) within the People's Rights Network, via video conferences or in-person meetings, January 1, 2022 to present, including but not limited to the event on Ammon Bundy's property referred to as "P.A.C.T." in 2022.
17. Please produce documents sufficient to reflect all financial transactions (including, but not limited, to transfers and conveyance of assets) involving People's Rights Network from March 1, 2022 to present.
18. Please produce documents sufficient to reflect your duties, responsibilities and authorities with the People's Rights Network.
19. Please produce documents sufficient to reflect the number of members of the People's Rights Network from March 1, 2022 to present.
20. Please produce documents sufficient to identify and explain the People's Rights Network's computer network, including servers, software, and system.
21. Please produce documents sufficient to identify the "Area Assistants" for People's Right's Network in Idaho 1N, Idaho 2, Idaho 4NE, Idaho 4NW, Idaho 4SE, Idaho 4SW, Idaho 5, Idaho 6, Idaho 7, Idaho 8, Idaho 9, Idaho 10, Idaho 11, Idaho 12, Idaho 13, Idaho 14, Idaho 15 from March 1, 2022 to present.
22. Please provide documents sufficient to identify and explain the operations of the Ham Radio Network areas Idaho 1N, Idaho 2, Idaho 4NE, Idaho 4NW, Idaho 4SE, Idaho 4SW,

Idaho 5, Idaho 6, Idaho 7, Idaho 8, Idaho 9, Idaho 10, Idaho 11, Idaho 12, Idaho 13, Idaho 14, Idaho 15 of the People's Rights Network.

23. Please provide documents relating to the "activation" of the People's Rights Network relating to the infant known as "Baby Cyrus."

24. Please provide all video and photographs relating to the infant known as "Baby Cyrus."

25. Please provide all video and photographs relating to protests or disturbance at any St. Luke's facility or location from March 1, 2022 to present.