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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

**SECOND SET OF INTERROGATORIES  
AND SECOND SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
FREEDOM MAN PAC**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Dr. Natasha Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and through its counsel of record and pursuant to Idaho Rules of Civil Procedure 33, 34 and 69, hereby requests Freedom Man PAC to answer the interrogatories contained herein and produce all documents for inspection and/or copying, in accordance with the Instructions and Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement. These requests are relevant to the claims for punitive damages.

### **GENERAL INSTRUCTIONS**

These discovery requests shall be continuing in nature and require the addition of supplemental information in the future.

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend

you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production, you acquire any additional responsive documents, you are requested to serve supplemental responses containing such information.

#### **INSTRUCTIONS AND DEFINITIONS FOR INTERROGATORIES**

(A) These Interrogatories are continuing in nature and require the timely filing of Supplemental Answers if further or different information is obtained.

(B) Where the name or identity of a person is requested, please state the person’s full name, home address, business address and telephone number, if known.

(C) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrences mentioned or complained of in the pleadings.

(D) Knowledge or information of a party shall include the knowledge of the party's agents, representatives and, unless otherwise privileged, his or her attorneys.

(E) The pronoun "you" refers to the party to whom these Interrogatories are addressed and the person or persons described in paragraph (D), above.

(F) The term "document" or "documents" shall have the broadest meaning possible and includes Electronically Stored Information (ESI) including but not limited to email, texts and the like, hand-written notes and the like, and all other writings, drawings, graphs, charts, photographs, recordings and other data compilations from which information can be obtained.

(G) The terms "identify" and "identification," when used in reference to a natural person, requires you to state the person's full name, last known address, home and business telephone numbers and present business affiliation. When used in reference to a person other than a natural person, the terms "identify" and "identification" require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person," above), and to state that person's last known address, telephone number, and principal place of business. Once any person has been properly identified, it shall be sufficient thereafter when identifying that same person to state the name only.

(H) The terms "identify" and "identification," when used in reference to a document, require you to state the date, the author (or, if different, the signer(s), the addressee and the type of document, e.g., letter, memoranda, telegram, chart, etc.). If any identified document was, but is no longer in your possession or subject to your control, state what disposition was made of it and the reason for such disposition. In lieu of identifying a document, at your option, you may describe a document by Bates Number and produce that document separately.

(I) “Relating to” a subject means making a statement about, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting, comprising or in any way pertaining, in whole or in part, to a subject.

(J) The term “occurrence” means the incident(s) giving rise to in the Complaint.

(K) If, in answering these Interrogatories, you encounter any ambiguities in construing a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering.

### **INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

You are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

## **DEFINITIONS**

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

1. “You,” “Your,” or “Yours,” shall mean Freedom Man PAC and any person or entity acting or purporting to act on his behalf or controlled by him, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, trusts, corporations, limited liability companies, partnerships, unincorporated associations, or other persons or entities.

2. “Plaintiffs” shall mean St. Luke’s Health System, St. Luke’s Regional Center, Ltd., Chris Roth, Dr. Natasha Erickson, Tracy W. Jungman, NP, and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

3. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

4. “Asset” is anything that has current or future economic value, including, but not limited to money, securities, real property, promissory notes, contracts, accounts receivable, cryptocurrency, patents, trademarks, or precious metals.

5. “Describe” shall mean to set forth all facts that exhaust your information, knowledge, and belief with respect to the subject matter of the discovery request.

6. “Document” or “Documents” shall mean the original, all copies, and drafts of papers and writings of every kind, description, and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description, and form, and all photographs of every kind, and including, without limiting the

generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes, and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trusts, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video, or sound recordings, cassette tapes, video recorded, electronic, or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such documents.

7. “Income” shall mean gain, compensation, revenue, money, securities, cryptocurrency, or other benefit received, including, without limitation, the following: salaries/wages/commissions; dividends; interest; income from business/profession; partnership income; capital gains; annuities and pensions; rents and royalties; income from estates and trusts; dispositions of precious metals, social security income; social security disability insurance; and unemployment insurance.

8. “Knowledge” shall mean firsthand knowledge and information derived from any other source, including, but not limited to, hearsay knowledge.

9. “Net Worth” is value of the assets a person or corporation owns, minus the liabilities they owe.

10. “Person” shall mean any natural person and any other cognizable entity, including but not limited to, corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

11. The words “Relate To” or “Relating To” shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or compromises.

### **INTERROGATORIES**

**INTERROGATORY NO. 30:** Please identify each action that you have taken to transfer ownership or title of any real property owned or controlled by You to another person or entity (including, but not limited to, any estate or trust) during the period of March 1, 2022 to present.

**INTERROGATORY NO. 31:** Please identify all sources of Income for You from January 1, 2022 to present by stating the name, address, and contact information for each source.

**INTERROGATORY NO. 32:** Please identify the amounts received from each source of Income identified in response to Interrogatory Number 2, the preceding interrogatory.

**INTERROGATORY NO. 33:** Identify all real property owned and/or controlled by You including without limitation the nature of the real property interest, a description of the real property, the location of the real property, the fair market value of the real property, and any perfected security interests in the property.

**INTERROGATORY NO. 34:** Identify all of Your assets other than real property, including without limitation cash, cryptocurrency, accounts, accounts receivable, note receivable, other financial assets, equity interests, shares of stock, partnership interests, claims, choses in



action, patents, trademarks, applications, other intangible property, inventory and equipment.

With respect to accounts, identify the institution, location, and account number.

**INTERROGATORY NO. 35:** Identify all of Your creditors. For each creditor, provide their name, address, nature of their claim, the amount they claim is owing, and, if different, the amount you claim is owing.

**INTERROGATORY NO. 36:** Identify all of Your debtors. For each debtor, provide their name, address, nature of your claim against them, the amount you claim is owing, and, if different, the amount they claim is owing.

**INTERROGATORY NO. 37:** State Your current Net Worth.

**INTERROGATORY NO. 38:** Identify each limited liability company, partnership, and/or corporate entity in which you are a member or owner.

**INTERROGATORY NO. 39:** Identify each trust of which you are a beneficiary.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 35:** Produce all Documents identified in response to these Discovery Requests, all Documents upon which you relied in answering these requests, and all Documents that relate to your responses to these Discovery Requests. In producing the Documents called for by this Request, please organize and label them to correspond with the Interrogatory(ies) or Request(s) to which they relate.

**REQUEST FOR PRODUCTION NO. 36:** Please produce copies of all federal and state income tax returns, including all schedules thereto, signed or filed by you or on your behalf with the Internal Revenue Service or any state between January 1, 2022, and the present.

**REQUEST FOR PRODUCTION NO. 37:** Please produce copies of all financial statements, statements of net worth, or other similar documents that describe your financial condition that were prepared between January 1, 2022, and the present.

**REQUEST FOR PRODUCTION NO. 38:** Please produce copies of any and all applications for loans (including, without limitation: credit cards, mortgage loans, lines of credit, business loans, installment loans, payday loans, check loans, check overdraft accounts, signature loans, government-subsidized loans, business loans, and consolidation loans) You have submitted to any financial institution (including, without limitation: banks, credit unions, credit card issuers, mortgage lenders, and peer-to-peer lenders) on behalf of yourself or a third party, between January 1, 2022 and the present.

**REQUEST FOR PRODUCTION NO. 39:** Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

**REQUEST FOR PRODUCTION NO. 40:** Produce all Documents evidencing or relating to your Assets.

**REQUEST FOR PRODUCTION NO. 41:** Produce all Documents evidencing or relating to your liabilities.

**REQUEST FOR PRODUCTION NO. 42:** Produce all Documents relating to any real estate transactions that you have been involved in since January 1, 2022 to the present.

**REQUEST FOR PRODUCTION NO. 43:** Produce all documents relating to financial transactions involving the Freedom Tabernacle, Incorporated from January 1, 2019 to the present.

**REQUEST FOR PRODUCTION NO. 44:** Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and the present.

**REQUEST FOR PRODUCTION NO. 45:** Produce all documents relating to financial transactions involving You and the Ammon Bundy for Governor Campaign between January 1, 2019 and present.

**REQUEST FOR PRODUCTION NO. 46:** Produce all documents relating to financial transactions involving Power Marketing Consultants LLC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 47:** Produce all documents relating to financial transactions involving Power Marketing Agency, LLC. from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 48:** Produce all documents relating to financial transactions involving Freedom Man Press LLC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 49:** Produce all documents relating to financial transactions involving You and Diego Rodriguez.

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 via iCourt and 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

- 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](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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