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 zjmccraney@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

PLAINTIFF ST. LUKE'S HEALTH SYTEM, LTD'S SECOND REQUESTS FOR ADMISSION TO DEFENDANT DIEGO RODRIGUEZ

Plaintiff St. Luke's Health System, LTD ("Plaintiff"), by and through its attorney of record, hereby requests Defendant Diego Rodriguez ("Rodriguez") respond to all requests for admission in accordance with the Instructions and Definitions set forth below within thirty (30)

PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S SECOND REQUESTS FOR ADMISSION TO DEFENDANT DIEGO RODRIGUEZ - 1

days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

I. INSTRUCTIONS REGARDING REQUESTS FOR ADMISSION

Pursuant to Rule 36 of the Idaho Rules of Civil Procedure, the requests for admission set forth below must be answered within thirty (30) days or such time as the Court directs. They must be answered fully and separately in writing, under oath, and in accordance with the Idaho Rules of Civil Procedure. Your answers must draw upon not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents, employees, or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Pursuant to Rule 36(a), each matter for which an admission is requested shall be separately set forth. For each request for admission which includes subparts, your answer to each subpart should be separately set forth wherever appropriate or necessary to distinguish your answer from another subpart or request for admission.

Each matter shall be deemed admitted unless, within such time as the Court directs, you serve upon the undersigned a written answer in conformance with the requirements of Rule 36(a). You are hereby advised that a failure to specifically answer any request for admission or matter contained therein, or an evasive answer to any request for admission or matter contained therein, may be deemed an admission of the truth of such request or matter contained therein.

II. **DEFINITIONS**

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

- a. "You," "Your," and "Yours," shall mean Defendant Diego Rodriguez, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.
- b. "Plaintiffs" shall mean St. Luke's Health System, LTD; St. Luke's Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.
- c. "St. Luke's" shall mean Plaintiffs St. Luke's Health System, LTD and St. Luke's Regional Medical Center.
- d. "St. Luke's Boise" shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.
- e. "St. Luke's Meridian" shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.
- f. "Defendants" refers to all named Defendants in the lawsuit, including Ammon
 Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man
 PAC, and People's Rights Network.
- g. "Complaint" refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.
- h. "Answer" refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

- i. The term "evidence" includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.
- j. The words "and," "and/or," and "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.
- k. "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.
- l. "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, including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, 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, 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, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions,

official statements, prospectuses, appraisals, feasibility studies, 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. Documents are also to include all electronically stored information ("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

- m. "Identify" when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:
 - i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
 - ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
 - iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;

- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.
- n. "Identify" when used with respect to a natural person shall mean that You provide the following information with respect to the person:
 - i. The name;
 - ii. The business address and telephone number;
 - iii. The residence address and telephone number; and
 - iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "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.

- r. 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 comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
 - t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
 - w. "DHW" shall mean the Idaho Department of Health and Welfare.

III. REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 230: Admit that the Infant was dehydrated on March 1, 2022.

REQUEST FOR ADMISSION NO. 231: Admit that the Infant's Parents took the Infant to St. Luke's on March 1, 2022.

REQUEST FOR ADMISSION NO. 232: Admit that the Infant had been vomiting for weeks before the Infant's Parents took him to St. Luke's on March 1, 2022.

REQUEST FOR ADMISSION NO. 233: Admit that the Infant was approximately 10 months old on March 1, 2022.

REQUEST FOR ADMISSION NO. 234: Admit that the Infant had lost several pounds between November 1, 2021 and March 1, 2022.

REQUEST FOR ADMISSION NO. 235: Admit that on March 2, 2022, the Infant was diagnosed with severe malnutrition.

REQUEST FOR ADMISSION NO. 236: Admit that the Infant's Parents agreed to admit the Infant to St. Luke's Boise on March 1, 2022.

REQUEST FOR ADMISSION NO. 237: Admit that the Infant's Parents were told to take the Infant to his PCP for follow-up monitoring after discharge from St. Luke's Boise on March 4, 2022.

REQUEST FOR ADMISSION NO. 238: Admit that the Infant attended a follow-up monitoring appointment on March 7, 2022, which revealed that the Infant had lost weight since being discharged from St. Luke's on March 4, 2022.

REQUEST FOR ADMISSION NO. 239: Admit that the Infant attended a follow-up monitoring appointment on March 10, 2022, which revealed that the Infant had lost weight since the Infant's March 7, 2022, medical appointment.

REQUEST FOR ADMISSION NO. 240: Admit that on March 11, 2022, the Infant's father told a DHW social worker that the Infant's Parents would bring the Infant in for a weight check on March 11, 2022.

REQUEST FOR ADMISSION NO. 241: Admit that the Infant's Parents did not bring the Infant in for a weight check on March 11, 2022.

REQUEST FOR ADMISSION NO. 242: Admit that the Infant's Parents were contacted more than once regarding the expected weight check on March 11, 2022.

REQUEST FOR ADMISSION NO. 243: Admit that Meridian police went to the Infant's family's residence to check on the Infant's safety on March 11, 2022.

REQUEST FOR ADMISSION NO. 244: Admit that the Infant's Parents refused to cooperate, provide information, or let the officers see the Infant when Meridian police went to the Infant's family's residence.

REQUEST FOR ADMISSION NO. 245: Admit that You refused to cooperate, provide information, or let the officers see the Infant when Meridian police went to the Infant's family's residence.

REQUEST FOR ADMISSION NO. 246: Admit that the Infant was taken to another location after Meridian police left the Infant's family's residence.

REQUEST FOR ADMISSION NO. 247: Admit that You knew the Infant was severely malnourished during the period March 1 through March 11, 2022.

REQUEST FOR ADMISSION NO. 248: Admit that on March 11, 2022, You knew the Infant was severely malnourished.

REQUEST FOR ADMISSION NO. 249: Admit that DHW had temporary custody of the Infant beginning late on March 11, 2022.

REQUEST FOR ADMISSION NO. 250: Admit that St. Luke's did not have custody of the Infant at any time.

REQUEST FOR ADMISSION NO. 251: Admit that the Infant was admitted for medical care at St. Luke's Boise from March 12, 2022 through March 15, 2022.

REQUEST FOR ADMISSION NO. 252: Admit that St. Luke's updated the Infant's Parents on the Infant's condition during the time the Infant was admitted at St. Luke's Boise from March 12, 2022 through March 15, 2022.

REQUEST FOR ADMISSION NO. 253: Admit that St. Luke's updated the Infant's Parents on the Infant's plan of care during the time the Infant was admitted at St. Luke's Boise from March 12, 2022 through March 15, 2022.

REQUEST FOR ADMISSION NO. 254: Admit that You entered St. Luke's property on March 15, 2022 to protest.

REQUEST FOR ADMISSION NO. 255: Admit that You did not enter St. Luke's property on March 15, 2022 to seek medical care.

REQUEST FOR ADMISSION NO. 256: Admit that You solicited payments from third-parties through GiveSendGo.

REQUEST FOR ADMISSION NO. 257: Admit that You solicited payments from third-parties through GiveSendGo in connection with Your narrative about the Infant.

REQUEST FOR ADMISSION NO. 258: Admit that the Infants' Parents did not owe any money to St. Luke's for any of the medical care of the Infant in March 2022.

REQUEST FOR ADMISSION NO. 259: Admit that You knew that the Infants' Parents were receiving government benefits to cover any medical care from St. Luke's for the Infant in March 2022.

REQUEST FOR ADMISSION NO. 260: Admit that You knew that the Infants' Parents would owe no money to St. Luke's for any medical care for the Infant in March 2022.

REQUEST FOR ADMISSION NO. 261: Admit that St. Luke's did not undertake any medical care of the Infant that the Infant's Parents did not approve.

REQUEST FOR ADMISSION NO. 262: Admit that You coordinated with Ammon Bundy to plan the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 263: Admit that You coordinated with the People's Rights Network to plan the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 264: Admit that You coordinated with Ammon Bundy for Governor to plan the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 265: Admit that You coordinated with Freedom Man PAC to plan the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 266: Admit that You coordinated with Freedom Man Press LLC to plan the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 267: Admit that You coordinated with Ammon Bundy to carry out the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 268: Admit that You coordinated with the People's Rights Network to carry out the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 269: Admit that You coordinated with Ammon Bundy for Governor to carry out the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 270: Admit that You coordinated with Freedom Man PAC to carry out the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 271: Admit that You coordinated with Freedom Man Press LLC to carry out the disruption at St. Luke's during the period March 11 through March 18, 2022.

REQUEST FOR ADMISSION NO. 272: Admit that You coordinated with Ammon Bundy to prepare messaging to the public relating to the Infant.

REQUEST FOR ADMISSION NO. 273: Admit that You coordinated with the People's Rights Network to prepare messaging to the public relating to the Infant.

REQUEST FOR ADMISSION NO. 274: Admit that You coordinated with Ammon Bundy for Governor to prepare messaging to the public relating to the Infant.

REQUEST FOR ADMISSION NO. 275: Admit that You coordinated with Freedom Man PAC to prepare messaging to the public relating to the Infant.

REQUEST FOR ADMISSION NO. 276: Admit that You coordinated with Freedom Man Press LLC to prepare messaging to the public relating to the Infant.

REQUEST FOR ADMISSION NO. 277: Admit that St. Luke's did not abuse the Infant.

REQUEST FOR ADMISSION NO. 278: Admit that no one at St. Luke's abused the Infant.

REQUEST FOR ADMISSION NO. 279: Admit that St. Luke's did not vaccinate the Infant.

REQUEST FOR ADMISSION NO. 280: Admit that no one at St. Luke's vaccinated the Infant.

REQUEST FOR ADMISSION NO. 281: Admit that no one at St. Luke's harmed the Infant.

REQUEST FOR ADMISSION NO. 282: Admit that St. Luke's did not misdiagnose the Infant.

REQUEST FOR ADMISSION NO. 283: Admit that Natasha Erickson did not misdiagnose the Infant.

REQUEST FOR ADMISSION NO. 284: Admit that no one at St. Luke's harmed the Infant.

REQUEST FOR ADMISSION NO. 285: Admit that the Infant's health improved while under St. Luke's care.

REQUEST FOR ADMISSION NO. 286: Admit that the Infant gained weight while under St. Luke's care.

REQUEST FOR ADMISSION NO. 287: Admit that You have disclosed the Infant's personal health information publicly online.

REQUEST FOR ADMISSION NO. 288: Admit that You know that St. Luke's cannot disclose personal health information publicly.

REQUEST FOR ADMISSION NO. 289: Admit that St. Luke's did not kidnap the Infant.

REQUEST FOR ADMISSION NO. 290: Admit that Chris Roth did not kidnap the Infant.

REQUEST FOR ADMISSION NO. 291: Admit that Natasha Erickson did not kidnap the Infant.

REQUEST FOR ADMISSION NO. 292: Admit that Tracy Jungman did not kidnap the Infant.

REQUEST FOR ADMISSION NO. 293: Admit that St. Luke's does not kidnap children.

REQUEST FOR ADMISSION NO. 294: Admit that Chris Roth does not kidnap children.

REQUEST FOR ADMISSION NO. 295: Admit that Natasha Erickson does not kidnap children.

REQUEST FOR ADMISSION NO. 296: Admit that Tracy Jungman does not kidnap children.

REQUEST FOR ADMISSION NO. 297: Admit that St. Luke's does not profit from kidnapping children.

REQUEST FOR ADMISSION NO. 298: Admit that Chris Roth does not profit from kidnapping children.

REQUEST FOR ADMISSION NO. 299: Admit that Natasha Erickson does not profit from kidnapping children.

REQUEST FOR ADMISSION NO. 300: Admit that Tracy Jungman does not profit from kidnapping children.

REQUEST FOR ADMISSION NO. 301: Admit that St. Luke's did not traffick the Infant.

REQUEST FOR ADMISSION NO. 302: Admit that Chris Roth did not traffick the Infant.

REQUEST FOR ADMISSION NO. 303: Admit that Natasha Erickson did not traffick the Infant.

REQUEST FOR ADMISSION NO. 304: Admit that Tracy Jungman did not traffick the Infant.

REQUEST FOR ADMISSION NO. 305: Admit that St. Luke's does not participate in child trafficking.

REQUEST FOR ADMISSION NO. 306: Admit that Chris Roth does not participate in child trafficking.

REQUEST FOR ADMISSION NO. 307: Admit that Natasha Erickson does not participate in child trafficking.

REQUEST FOR ADMISSION NO. 308: Admit that Tracy Jungman does not participate in child trafficking.

REQUEST FOR ADMISSION NO. 309: Admit that St. Luke's does not profit from child trafficking.

REQUEST FOR ADMISSION NO. 310: Admit that Chris Roth does not profit from child trafficking.

REQUEST FOR ADMISSION NO. 311: Admit that Natasha Erickson does not profit from child trafficking.

REQUEST FOR ADMISSION NO. 312: Admit that Tracy Jungman does not profit from child trafficking.

REQUEST FOR ADMISSION NO. 313: Admit that Tracy Jungman did not commit medical malpractice when evaluating the Infant.

REQUEST FOR ADMISSION NO. 314: Admit that You know that Tracy Jungman did not commit medical malpractice when evaluating the Infant.

REQUEST FOR ADMISSION NO. 315: Admit that You know that the following statement is false: "St. Luke's is world famous for being the worst, for, you know, for mistreating people, for killing people—literally I'm not being hyperbolic there—for this type of issue, stealing babies from parents."

REQUEST FOR ADMISSION NO. 316: Admit that You know that the following statement is false: St. Luke's forced the Infant to take toxic poison.

REQUEST FOR ADMISSION NO. 317: Admit that You know that the following statement is false: St. Luke's has a reputation for taking horrible service and treatment to children.

REQUEST FOR ADMISSION NO. 318: Admit that You know that the following statement is false: St. Luke's is corrupt top to bottom.

REQUEST FOR ADMISSION NO. 319: Admit that You know that the following statement is false: Dr. Natasha Erickson called CPS.

REQUEST FOR ADMISSION NO. 320: Admit that You know that the following statement is false: St. Luke's is just a huge cartel.

REQUEST FOR ADMISSION NO. 321: Admit that You know that the following statement is false: All St. Luke's does is harm people.

REQUEST FOR ADMISSION NO. 322: Admit that You know that the following statement is false: The Infant was perfectly healthy on March 11, 2022.

REQUEST FOR ADMISSION NO. 323: Admit that You know that the following statement is false: The Infant was taken into custody solely because the Infant's Parents missed one medical appointment.

REQUEST FOR ADMISSION NO. 324: Admit that You know that the following statement is false: St. Luke's has no interest in actually helping anybody.

REQUEST FOR ADMISSION NO. 325: Admit that You know that the following statement is false: The Infant's condition worsened while admitted at St. Luke's Boise.

REQUEST FOR ADMISSION NO. 326: Admit that You have a net worth of over \$10 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 327: Admit that the fair market value of the Power Marketing Consultants LLC is more than \$10 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 328: Admit that You have a net worth of over \$5 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 329: Admit that You have a net worth of over \$15 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 330: Admit that the fair market value of the Power Marketing Agency LLC is more than \$10 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 331: Admit that the fair market value of the Power Marketing Agency LLC is more than \$5 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 332: Admit that the fair market value of the Power Marketing Consultants LLC is more than \$1 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 333: Admit that the fair market value of the Power Marketing Agency LLC is more than \$1 million dollars as of the date of this request.

PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S SECOND REQUESTS FOR ADMISSION TO DEFENDANT DIEGO RODRIGUEZ - 17

REQUEST FOR ADMISSION NO. 334: Admit that the fair market value of the Power Marketing Agency LLC is more than \$15 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 335: Admit that the fair market value of the Power Marketing Agency LLC is more than \$5 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 336: Admit that the fair market value of Freedom Tabernacle, Incorporated is more than \$15 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 337: Admit that the fair market value of Freedom Tabernacle, Incorporated is more than \$10 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 338: Admit that the fair market value of Freedom Tabernacle, Incorporated is more than \$5 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 339: Admit that the fair market value of Freedom Tabernacle, Incorporated is more than \$15 million dollars as of the date of this request.

REQUEST FOR ADMISSION NO. 340: Admit that You received more than \$2 million dollars in taxable income from Freedom Tabernacle, Incorporated in 2022.

REQUEST FOR ADMISSION NO. 341: Admit You received more than \$2 million dollars in taxable income from Power Marketing Agency LLC in 2022.

REQUEST FOR ADMISSION NO. 342: Admit You received more than \$2 million dollars in taxable income from Power Marketing Consultants LLC in 2022.

REQUEST FOR ADMISSION NO. 343: Admit that You received more than \$2 million dollars in taxable income from Freedom Tabernacle, Incorporated in 2022.

REQUEST FOR ADMISSION NO. 344: Admit You received more than \$1 million dollars in taxable income from Power Marketing Agency LLC in 2022.

REQUEST FOR ADMISSION NO. 345: Admit You received more than \$2 million

dollars in taxable income from Power Marketing Consultants LLC in 2022.

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 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	□ U.S. Mail
1317 Edgewater Dr., #5077	☐ Hand Delivered
Orlando, FL 32804	☐ Overnight Mail
	☑ Email/iCourt/eServe: dr238412@me.com;
	freedommanpress@protonmail.com
	/s/ Erik F. Stidham
	Erik F. Stidham
	OF HOLLAND & HART LLP
	Of HOLLIND & HINT LLF

21349082_v1