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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,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM TO
AMMON BUNDY FOR GOVERNOR**

STATE OF IDAHO TO: Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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: Fleming & Welsh, Attorneys at Law
1312 S. Washington Ave., Suite E
Emmett, Idaho 83617

DATE/TIME: May 26, 2023, at 9:30 a.m. MST

- 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 22, 2023, at 5:00 p.m. MST

- 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 20, 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 20th 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 checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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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:
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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:
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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

Erik F. Stidham
OF HOLLAND & HART LLP

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EXHIBIT A

Ammon Bundy for Governor

DEFINITIONS

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

- a. “You,” “Your,” and “Yours,” shall mean Defendant Ammon Bundy for Governor, and any person acting or purporting to act on its 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, and 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.

TOPICS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), Ammon Bundy for Governor (the “Bundy Campaign”) is required to designate one or more officers, directors, or managing agents, or designate other persons to testify on the Bundy Campaign’s behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization.

1. All communications the Bundy Campaign had regarding any issue in the above-captioned lawsuit, including but not limited to communications with other Defendants relating to the protests at St. Luke’s in March 2022, communications between the Bundy Campaign and any Defendant regarding Plaintiffs, communications between the Bundy Campaign and any Defendant relating to the Idaho Department of Health and Welfare’s intervention involving the infant grandson of Diego Rodriguez (“Infant”), communications between the Bundy Campaign and any Defendant regarding any rallies that took place in 2022 including the March 26, 2022 “P.A.C.T. Rally,” and communications between the Bundy Campaign and any Defendant regarding the content posted on PRN’s website relating to Plaintiffs or the Infant.

2. The Bundy Campaign’s participation in the March 2022 protests at St. Luke’s.

3. The circumstances surrounding the Bundy Campaign’s posting of any content on its website related to Plaintiffs and/or the Infant, including but not limited to, who authorized the posts, what was done prior to the posts, who drafted the posts, and who has authority to remove them.

4. Contributions to the Bundy Campaign, including but not limited to, the sources of the contributions, the means of raising them, and their amounts.

5. Expenditures by the Bundy Campaign, including but not limited to, who receives money or other things of value from the Bundy Campaign and to what extent.
6. The amount of money or other things of value raised in connection with the Infant.
7. Any and all evidence the Bundy Campaign has to support its contention that Plaintiffs are involved in criminal activity, kidnapping, child trafficking, and/or child abuse.
8. Any and all evidence the Bundy Campaign has to support its contention that Plaintiffs are incompetent in their trade or profession.
9. All payments made to Power Marketing, Diego Rodriguez, or to any entity controlled by or person related to Diego Rodriguez.
10. Any services or goods received from Diego Rodriguez, any member of Diego Rodriguez's family, or any organization or entity owned or controlled by Diego Rodriguez.
11. All campaign expenditures relating to Medieval Times.
12. Any campaign funds paid to Ammon Bundy or any entity or organization that Ammon Bundy controls or owns.

This deposition shall be taken pursuant to the Idaho Rules of Civil Procedure.

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering these requests.

REQUEST FOR PRODUCTION NO. 2: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 3: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, including, but not limited to emails, text messages, correspondence, or other ESI, which relate to the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 5: Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People’s Rights Network or freedomman.org.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

REQUEST FOR PRODUCTION NO. 7: Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any of these document requests.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents provided by You to any expert, or considered or relied upon by any expert, retained by You to form any opinions related to the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 10: Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 11: Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 12: Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

REQUEST FOR PRODUCTION NO. 13: Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, You or candidate Ammon Bundy sent or received related to any public appearance or livestreaming event candidate Ammon Bundy participated in or interview candidate Ammon Bundy gave from March 1, 2022 to present.

REQUEST FOR PRODUCTION NO. 14: Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

REQUEST FOR PRODUCTION NO. 15: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You and any Defendant in this lawsuit, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint or Answer.

REQUEST FOR PRODUCTION NO. 16: Please produce documents reflecting all employees and volunteers working for You from March 1, 2022 to present.

REQUEST FOR PRODUCTION NO. 17: Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

REQUEST FOR PRODUCTION NO. 18: Please produce, for the time period from January 1, 2022, to the present, all organizational documents.

REQUEST FOR PRODUCTION NO. 19: Please produce, for the time period from January 1, 2022, to the present, all organizational chart(s) relating to any entity owned, operated, or controlled by You.

REQUEST FOR PRODUCTION NO. 20: Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, People's Rights Network, Abish-husbandi Inc., Dono Custos, Inc., and any other business or entity through which you generate income, express ideas, or interact with the public.

REQUEST FOR PRODUCTION NO. 21: Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Diego Rodriguez or any entity or association owned or controlled by Diego Rodriguez, including but not limited to Freedom Man Press, LLC, Freedom Man PAC, Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, and Power Marketing Agency, LLC.

REQUEST FOR PRODUCTION NO. 22: Please produce copies of your campaign finance and disclosure documents for the years 2021 and 2022.

REQUEST FOR PRODUCTION NO. 23: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work product doctrine.

REQUEST FOR PRODUCTION NO. 24: Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: "Baby Cyrus" or "Cyrus" or "St. Luke's" or "Erickson" or "Roth" or "Jungman," or "kidnapping" or "crime" or "trafficking" including any misspellings of the same.

REQUEST FOR PRODUCTION NO. 25: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations.

REQUEST FOR PRODUCTION NO. 26: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

REQUEST FOR PRODUCTION NO. 27: Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

REQUEST FOR PRODUCTION NO. 28: Please produce all video or audio recordings relating to the claims and defenses in this lawsuit.

REQUEST FOR PRODUCTION NO. 29: Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held between March 11, 2022, to the present that relates in any way to this lawsuit.

REQUEST FOR PRODUCTION NO. 31: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to Persons between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People’s Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

REQUEST FOR PRODUCTION NO. 32: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that requested donations relating in any way to the events described in the Complaint.

REQUEST FOR PRODUCTION NO. 33: Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People’s Rights Network, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

REQUEST FOR PRODUCTION NO. 34: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 35: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any “Patriot” as that term is used in Ammon Bundy’s September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24)

that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 36: Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People's Rights Network.

REQUEST FOR PRODUCTION NO. 38: To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer, if any; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer, if any.

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