Electronically Filed 5/23/2023 9:42 AM Fourth Judicial District, Ada County Trent Tripple, Clerk of the Court By: Lauren Ketchum, Deputy Clerk

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

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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; DONO CUSTOS, INC., 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

DECLARATION OF JENNIFER M. JENSEN IN SUPPORT OF MOTION FOR SANCTIONS AS TO DONO CUSTOS, INC.

I, Jennifer M. 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. Attached hereto as **Exhibit A** is a true and correct copy of a report on Dono Custos, Inc. downloaded at my direction from the Wyoming Secretary of State website.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of a screen shot taken at my direction from the website https://www.donocustos.com/faq.
- 4. Attached hereto as **Exhibit** C is a true and correct copy of a screen shot from the website peoplesrights.org.
- 5. Attached hereto as **Exhibit D** is a true and correct copy of a report on Freedom Tabernacle, Incorporated downloaded at my direction from the Idaho Secretary of State website.
- 6. On April 7, 2023, my office obtained a subpoena for Rule 30(b)(6) deposition duces tecum of Dono Custos, Inc. from the District Court of the First Judicial District, State of Wyoming, County of Laramie (the "Subpoena"). The same day, my office filed a Notice of Intent to serve the Subpoena.
- 7. On April 14, 2023, the Subpoena was duly served on Dono Custos Inc.'s registered agent for service of process (Capital Administrations LLC) at 1712 Pioneer Ave. Suite 115, Cheyenne, Wyoming 82001. My office filed the Return of Service with the Court.
 - 8. The deposition was set for May 19, 2023, in Cheyenne, Wyoming.
- 9. Plaintiffs' counsel contacted Bundy via email (aebundy@bundyfarms.com) on three separate occasions prior to the deposition (on May 8, 12, and 18). This email address is Bundy's. Bundy has emailed Plaintiffs' counsel through it before. A true and correct copy of the three emails to Bundy is attached hereto as **Exhibit E**. Plaintiffs' counsel attached to the emails a

copy of the Notice of Intent (which includes the Subpoena) and the Return of Service. Plaintiffs'

counsel reminded Bundy that the deposition was set to go forward on May 19, 2023. Seeking to

avoid needless expenditure of fees and costs in the event Dono Custos refused to appear for the

deposition, Plaintiffs' counsel asked Bundy to inform Plaintiffs if no representative of Dono

Custos would appear. Despite the three emails, Plaintiffs' counsel received no response.

10. Due to construction at the original deposition site, Plaintiffs had to move the

deposition to a new location, a few blocks away from the original location, in Cheyenne.

Plaintiffs' counsel notified Bundy of this change of address via email on May 12 and 18, 2023.

11. Having properly noticed the deposition, and hearing nothing from Dono Custos, I

prepared for the deposition and traveled to Cheyenne for it. No representative of Dono Custos

appeared for the deposition at either the original location or the new location. Dono Custos did

not produce any documents.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is

true and correct.

DATED: May 23, 2023

By: /s/Jennifer M. Jensen

Jennifer M. Jensen

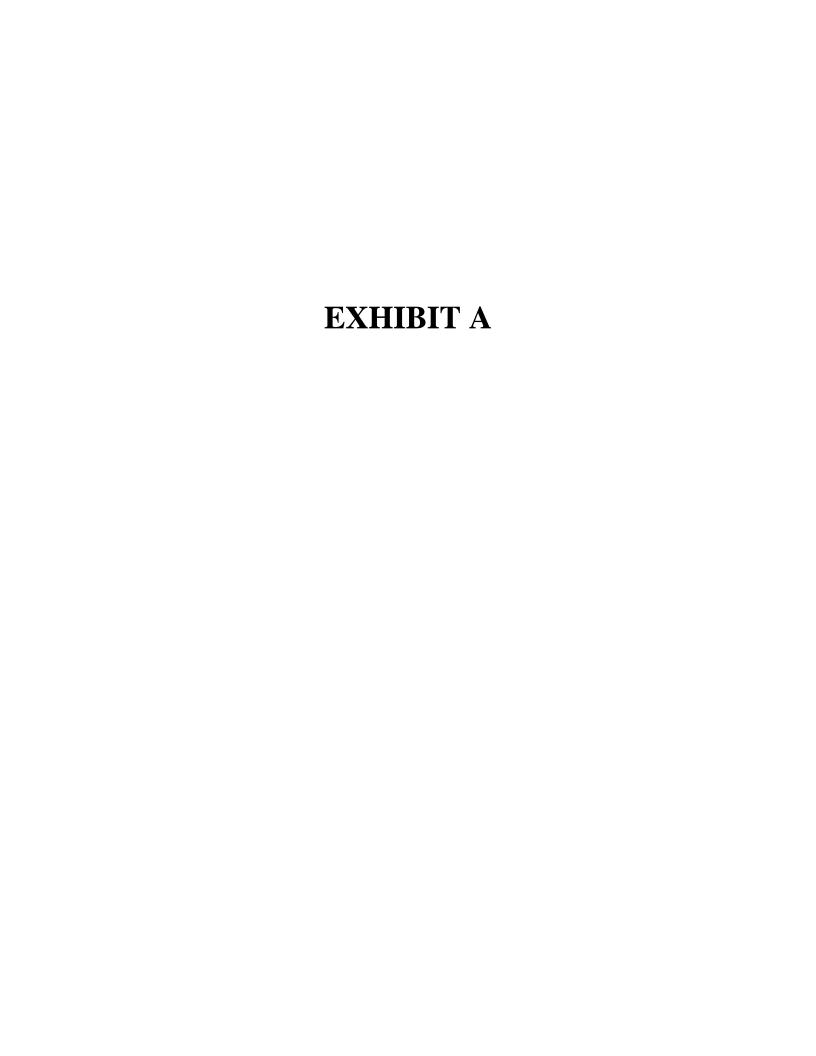
CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 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 via process server Overnight Mail Email/iCourt/eServe:	
Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	U.S. Mail Hand Delivered via process server 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 via process server 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 Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	 ☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe: ☐ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☑ Email/iCourt/eServe: freedommanpress@protonmail.com
Erik F	k F. Stidham . Stidham

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STATE OF WYOMING * SECRETARY OF STATE **BUSINESS DIVISION**

Herschler Bldg East, Ste.100 & 101, Cheyenne, WY 82002-0020 Phone: 307-777-7311 · Website: https://sos.wyo.gov · Email: business@wyo.gov

Filing Information



Please note that this form CANNOT be submitted in place of your Annual Report.

Name	Dono Custos, Inc.					
Filing ID	2020-000893750					
Туре	Profit Corporation			Status	Active	
General Information						
Old Name Fictitious Name Sub Type Formed in Term of Duration	Wyoming Perpetual			Sub Status Standing - Tax Standing - RA Standing - Other Filing Date Delayed Effective Da Inactive Date	Current Good Good Good 01/07/2020 4:11 PM	
Share Information	on					
Common Shares Par Value	1,000,000 0.0000	Preferred Share Par Value	es 0 0.00	000	Additional Stock N	
Principal Address			Mailing Address			
1712 Pioneer Ave Ste. 500 Cheyenne, WY 82			Ste. 50	ioneer Ave 0 nne, WY 82001		
Registered Ager	nt Address					
Capital Administra 1712 Pioneer Ave Cheyenne, WY 82	e Ste 115					
Parties						
Туре	Name / Organization / Address					
Incorporator	Capital Administrations, LLC 1712 Pioneer Ave. Ste 115 Cheyenne, WY 82001					
Notes						
Date	Recorded By	Note				

Filing Information



Please note that this form CANNOT be submitted in place of your Annual Report.

Name **Dono Custos, Inc.**

Filing ID 2020-000893750

Type Profit Corporation Status Active

Most Recent Annual Report Information

Type Original AR Year 2022

License Tax \$60.00 AR Exempt N AR ID 07034976

AR Date 1/21/2022 8:41 AM

Web Filed Y

Officers / Directors

Type Name / Organization / Address

President / Director Ammon Bundy 1712 Pioneer Ave Ste 500 Cheyenne WY 82001

Principal Address Mailing Address

1712 Pioneer Ave 1712 Pioneer Ave

Ste. 500 Ste. 500

Cheyenne, WY 82001 Cheyenne, WY 82001

Annual Report History

 Num
 Status
 Date
 Year
 Tax

 06033287
 Original
 12/24/2020
 2021
 \$50.00

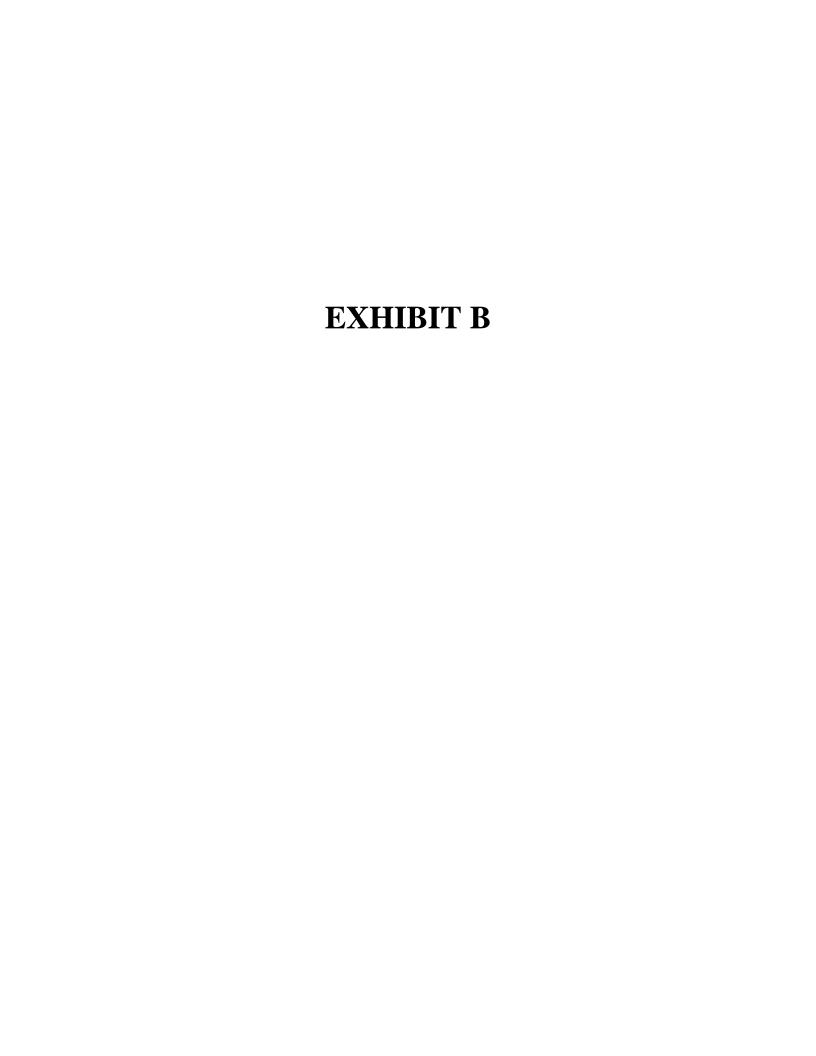
07034976 Original 01/21/2022 2022 \$60.00

Amendment History

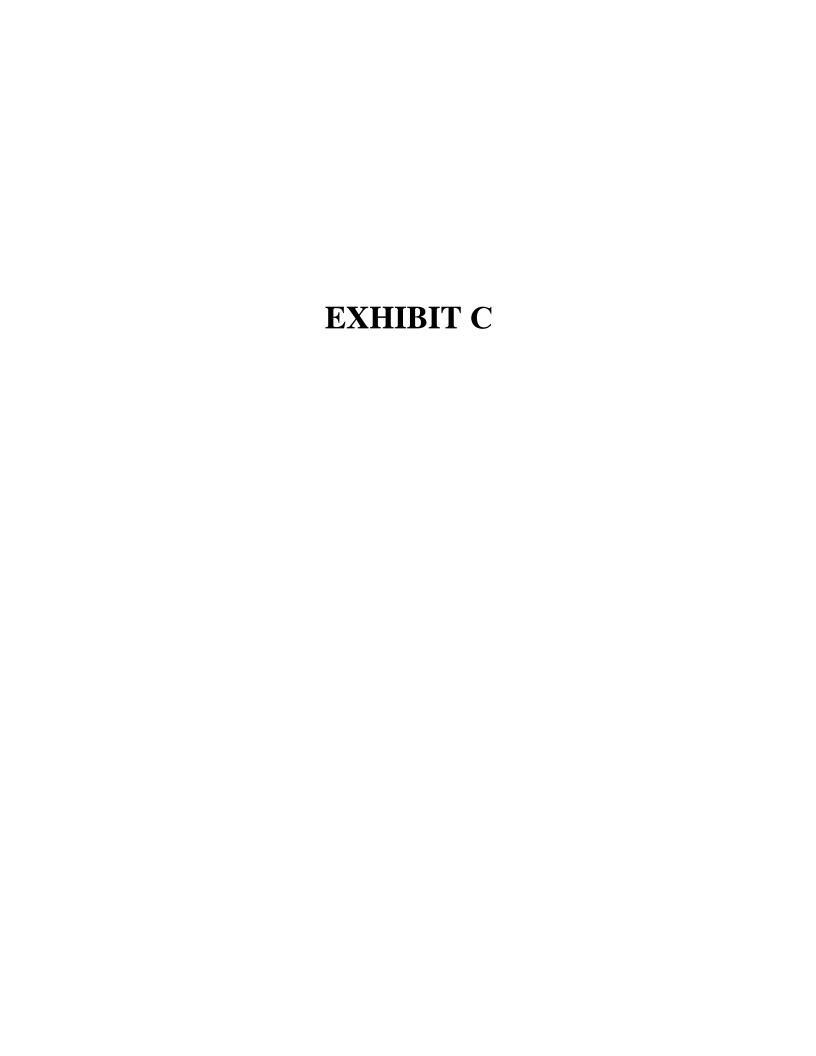
ID Description Date

2022-003522501 Delinquency Notice - Tax 01/02/2022

See Filing ID Initial Filing 01/07/2020









Offline

To help in a more traditional fashion, a check or money order made payable to the address below, may be sent via standard US Mail...

Dono Custos

PO Box 370, Emmett, ID 83617, USA

(Dono Custos is an entity created specifically to handle gifts made to worthy efforts like People's Rights.)

People's Rights





Give - once

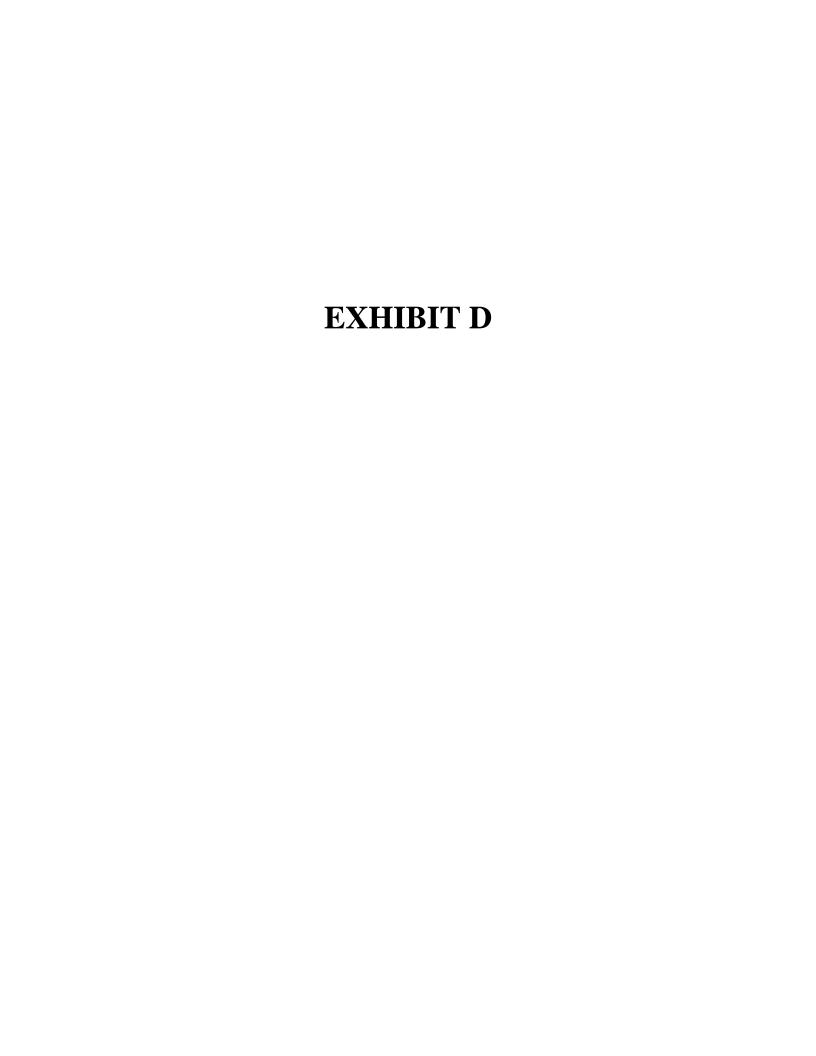


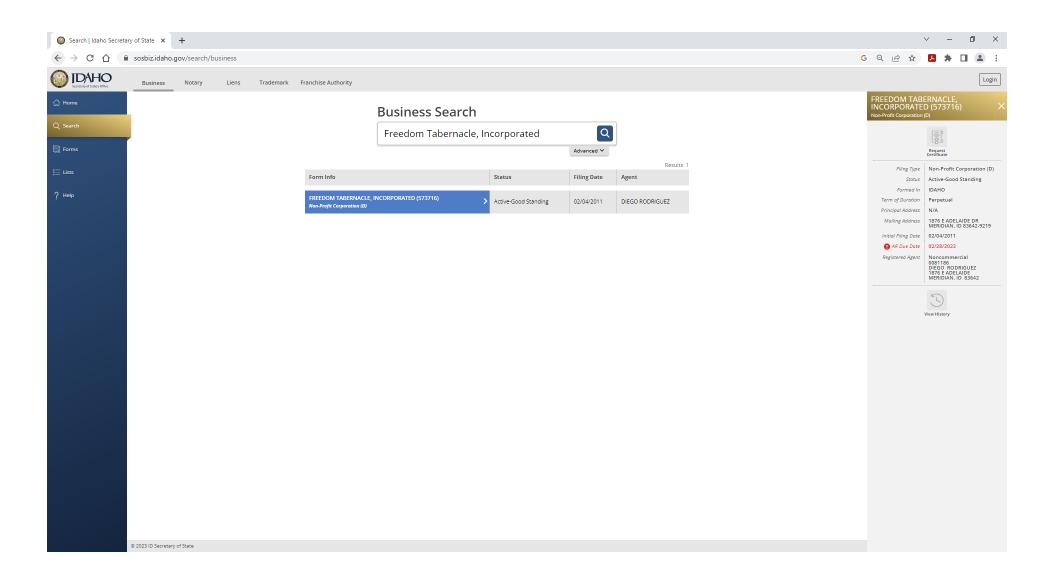
Your information is secure.

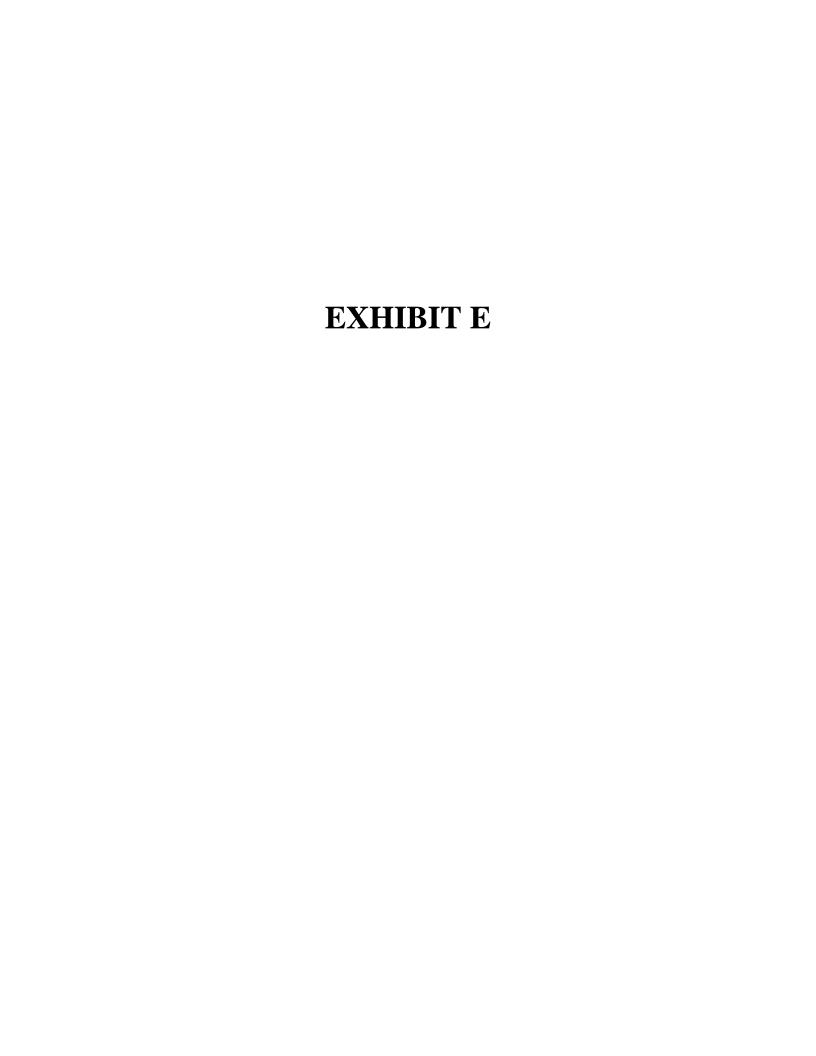
By accessing this form you agree to the

Terms of Service and Privacy Policy.

(Please Note: Your bank statement will show a donation to FREEDOM TABERNACLE.)







From: Erik Stidham

Sent: Thursday, May 18, 2023 9:39 AM

To: 'Ammon Bundy'
Cc: 'aebundy@prn.com'

Subject: RE: Deposition in Wyoming on May 19-response needed

Importance: High

Mr. Bundy.

I am writing yet again to ask that you confirm in writing whether representative of Dono Custos will be showing up for the deposition set for tomorrow in Wyoming. We are set to fly to Wyoming this afternoon. You will assist us in avoiding unnecessary costs and if you simply state in writing that no one will be showing up for the deposition. We will pursue sanctions for any costs and fees we incur relating to the deposition if no one shows up for the deposition.

Please provide us with a response no later the 12pm today.

Regards,

Erik Stidham

He / Him / His (What's this?)
Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: (208) 383-3934 |

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Erik Stidham

Sent: Friday, May 12, 2023 5:28 PM

To: 'Ammon Bundy' <aebundy@bundyfarms.com>
Subject: FW: Deposition in Wyoming on May 19

Importance: High

Mr. Bundy,

You have not responded to my prior email. If Dono Custos does not intend to provide a witness for the deposition, you need to tell me as soon as possible for the reasons explained below.

Due to construction, the deposition location had to be moved to **808 W. 20th St., Cheyenne, WY 82001.** All of the other information about the deposition remains the same.

Again, we would like to avoid wasting time and money if no one will attending on behalf of Dono Custos.

Regards,



Erik Stidham

He / Him / His (What's this?)

Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Erik Stidham

Sent: Monday, May 8, 2023 11:39 AM

To: 'Ammon Bundy'

Subject: Deposition in Wyoming on May 19

Mr. Bundy,

As you know, Plaintiffs have served a subpoena on your entity Dono Custos, Inc. for deposition with document production on May 19, 2023. The deposition is set in the city of Dono Custos's principal office—Cheyenne, Wyoming. A courtesy copy of the subpoena is also attached for your reference. Dono Custos is required to produce a witness prepared to testify on the topics listed in the subpoena, as well as provide the documents described in the subpoena.

You continue to refuse to comply with discovery obligations and that you control Dono Custos. If Dono Custos intends to not show up at the May 19, 2023 deposition, do my client the courtesy of telling me in advance. Otherwise, we will prepare for and appear at the deposition. If Dono Custos fails to attend, fails to produce documents, or otherwise fails to comply with the Court's orders, we will seek fees. If you inform me now, in a definitive way, that Dono Custos will not appear at the deposition, we will still seek sanctions, fees and costs. But the amount of fees and costs incurred will be mitigated because we can avoid incurring (and you can avoid paying) the costs incurred for preparing for and traveling to the deposition.

Let me know Dono Custos's intent regarding this deposition at your earliest convenience but no later than close of business May 9, 2023.

Also, you need to stop lying about my clients. You only increase the damages and the risk of violence through your ever-increasing lies. You must understand by now that my clients will not be deterred. Please stop with the lying before someone gets hurt.

Thank you.

Regards,



Erik Stidham

He / Him / His (What's this?)
Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

efstidham@hollandhart.com | T: (208) 383-3934 | M:

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