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Jennifer M. Jensen (ISB #9275)
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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; 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

- 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

21517612_v1

EXHIBIT A

**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.	Status	Active
Filing ID	2020-000893750		
Type	Profit Corporation		

General Information

Old Name		Sub Status	Current
Fictitious Name		Standing - Tax	Good
		Standing - RA	Good
Sub Type		Standing - Other	Good
Formed in	Wyoming	Filing Date	01/07/2020 4:11 PM
Term of Duration	Perpetual	Delayed Effective Date	
		Inactive Date	

Share Information

Common Shares	1,000,000	Preferred Shares	0	Additional Stock	N
Par Value	0.0000	Par Value	0.0000		

Principal Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Mailing Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Registered Agent Address

Capital Administrations LLC
1712 Pioneer Ave Ste 115
Cheyenne, WY 82001

Parties

Type	Name / Organization / Address
Incorporator	Capital Administrations, LLC 1712 Pioneer Ave. Ste 115 Cheyenne, WY 82001

Notes

Date	Recorded By	Note
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Filing Information



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

Name	Dono Custos, Inc.	Status	Active
Filing ID	2020-000893750		
Type	Profit Corporation		

Most Recent Annual Report Information

Type	Original	AR Year	2022
License Tax	\$60.00	AR Exempt	N
AR Date	1/21/2022 8:41 AM	AR ID	07034976
Web Filed	Y		

Officers / Directors

Type	Name / Organization / Address
President / Director	Ammon Bundy 1712 Pioneer Ave Ste 500 Cheyenne WY 82001

Principal Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Mailing Address

1712 Pioneer Ave
Ste. 500
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

EXHIBIT B

Dono Custos

... Guardian of Gifts for Worthy Causes ...

Common Questions

Below are some of the questions we often get regarding the services we provide, and how we operate.

Q. Where are you located?

A. Dono Custos, Inc. is incorporated in Wyoming, but is operated by volunteers from around the country. Leveraging available technologies allows us to operate with great frugality and ensure that available resources are used as wisely as possible to support the needs of worthy causes. Because of this, a central office is not necessary at this time.

Q. In what ways can I give to help support my favorite cause?

A. We accept credit card payments online, usually through the cause's website.

Q. Are my contributions tax-deductible?

A. Dono Custos, Inc. is structured as a business, and not as a government-sanctioned "non-profit" entity. There are many reasons for this - the primary being non-profit organizations are subject to restrictions on what they can do with their resources. As a result, financial contributions are not tax deductible.

Q. How do I ensure that my contribution is attributed to the desired cause?

A. The best way to ensure this is to use the gift link you are provided with by the website of your cause. It will clearly state that their efforts can be supported by making contributions to **Dono Custos, Inc.** When your contribution is made it will be directly applied to the expense of the services we provide for their effort. If you are submitting a **check** or **money order**, please simply write a reference to the cause in the memo or note section of your payment.

Q. Can I receive a refund for a gift I previously submitted?

A. Gifts made to Dono Custos, Inc. are non-refundable, except in the event of duplicate transactions. For this reason, please be sure of the amount you wish to give before submission.

If you still have questions for us, don't hesitate to [contact us](#).

© Copyright 2020 - 2022, Dono Custos, Inc. All rights reserved.

[Privacy Policy](#) | [Refund Policy](#) | [Terms of Service](#)

contact@donocustos.com

866-866-1733

EXHIBIT C



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.)



Card Number



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.**)

EXHIBIT D

- Home
- Search
- Forms
- Lists
- Help

Business Search

Freedom Tabernacle, Incorporated

Advanced

Results: 1

Form Info	Status	Filing Date	Agent
FREEDOM TABERNALE, INCORPORATED (573716) <i>Non-Profit Corporation (D)</i>	Active-Good Standing	02/04/2011	DIEGO RODRIGUEZ

FREEDOM TABERNALE, INCORPORATED (573716)

Non-Profit Corporation (D)



<i>Filing Type</i>	Non-Profit Corporation (D)
<i>Status</i>	Active-Good Standing
<i>Formed In</i>	IDAHO
<i>Term of Duration</i>	Perpetual
<i>Principal Address</i>	N/A
<i>Mailing Address</i>	1876 E ADELAIDE DR MERIDIAN, ID 83642-9219
<i>Initial Filing Date</i>	02/04/2011
<i>AR Due Date</i>	02/28/2023
<i>Registered Agent</i>	Noncommercial 0051196 DIEGO RODRIGUEZ 1876 E ADELAIDE MERIDIAN, ID 83642



EXHIBIT E

[REDACTED]

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 | [REDACTED]

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 | [REDACTED]

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: Monday, May 8, 2023 11:39 AM
To: 'Ammon Bundy' <aebundy@bundyfarms.com>
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: [REDACTED]

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