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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

**DECLARATION OF ERIK F. STIDHAM  
IN SUPPORT OF PLAINTIFFS'  
AMENDED MOTION FOR SANCTIONS  
AGAINST DEFENDANTS AMMON  
BUNDY, AMMON BUNDY FOR  
GOVERNOR, DIEGO RODRIGUEZ,  
FREEDOM MAN PRESS, FREEDOM  
MAN PAC, AND PEOPLE'S RIGHTS  
NETWORK FOR ONGOING REFUSAL  
TO COMPLY WITH COURT ORDERS  
AND DISCOVERY OBLIGATION**

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF PLAINTIFFS' AMENDED  
MOTION FOR SANCTIONS AGAINST DEFENDANTS AMMON BUNDY, AMMON  
BUNDY FOR GOVERNOR, DIEGO RODRIGUEZ, FREEDOM MAN PRESS,  
FREEDOM MAN PAC, AND PEOPLE'S RIGHTS NETWORK FOR ONGOING  
REFUSAL TO COMPLY WITH COURT ORDERS AND DISCOVERY  
OBLIGATION - 1

I, Erik F. Stidham, 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. On December 13, 2022, the Court ordered Diego Rodriguez to pay \$5,408.10 in fees and costs incurred relating to the Court-ordered deposition taken on October 5, 2022. As of the date of this motion, Diego Rodriguez has refused to pay this amount. Rodriguez had until January 12, 2022, to comply. He did not.

3. On February 8, 2023, the Court issued an Order Compelling Rodriguez to Respond to Discovery. The Discovery Order compelled Rodriguez to provide certain supplemental answers and responses to Plaintiffs’ Expedited First Interrogatories and Second Interrogatories and Requests for Production (together “Written Discovery”) to Plaintiffs by February 22, 2023.

4. To date, Defendants have refused to appear for depositions and to provide responsive discovery.

5. Attached as **Exhibit A** is Plaintiff St. Luke’s Health System, Ltd.’s Second Interrogatories, First Requests for Production to Defendant Ammon Bundy, served on October 19, 2022.

6. Attached as **Exhibit B** is Plaintiff St. Luke's Health System Ltd's First Interrogatories and Requests for Production to Defendant Ammon Bundy for Governor, served on October 24, 2022.
7. Attached as **Exhibit C** is Second Set of Interrogatories and Second Set of Requests for Production of Documents to Ammon Bundy for Governor, served on April 21, 2023.
8. Attached as **Exhibit D** is Second Set of Interrogatories and Second Set of Requests for Production of Documents to Freedom Man PAC, served on April 21, 2023.
9. Attached as **Exhibit E** is Second Set of Interrogatories and Second Set of Requests for Production of Documents to Freedom Man Press LLC, served on April 21, 2023.
10. Attached as **Exhibit F** is Second Set of Interrogatories and Second Set of Requests for Production of Documents to People's Rights Network, served on April 21, 2023.
11. Attached as **Exhibit G** is Third Set of Interrogatories and Second Set of Requests for Production of Documents to Ammon Bundy, served on April 21, 2023.
12. Attached as **Exhibit H** is Third Set of Interrogatories and Second Set of Requests for Production of Documents to Diego Rodriguez, served on April 21, 2023.
13. Attached as **Exhibit I** are May 23, 2023, emails between Diego Rodriguez and myself.
14. Attached hereto as **Exhibit J** is Second Set of Interrogatories and First Set of Requests for Production of Documents to Defendant Diego Rodriguez served on October 7, 2022.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 26th day of May, 2023.

/s/ Erik F. Stidham

Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of May, 2023, I caused to be filed and served, via iCourt, 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 via Process Server
- 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 via Process Server
- 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

- U.S. Mail

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF PLAINTIFFS' AMENDED MOTION FOR SANCTIONS AGAINST DEFENDANTS AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, DIEGO RODRIGUEZ, FREEDOM MAN PRESS, FREEDOM MAN PAC, AND PEOPLE'S RIGHTS NETWORK FOR ONGOING REFUSAL TO COMPLY WITH COURT ORDERS AND DISCOVERY OBLIGATION - 5

c/o Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- 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*

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Erik F. Stidham  
OF HOLLAND & HART LLP

21453227\_v1

# **EXHIBIT A**

Erik F. Stidham (ISB #5483)  
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](mailto:efstidham@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  
SYSTEM, LTD'S SECOND  
INTERROGATORIES, FIRST  
REQUESTS FOR PRODUCTION TO  
DEFENDANT AMMON BUNDY**

Plaintiff St. Luke's Health System, LTD ("Plaintiff"), by and through its attorney of record, hereby request Defendant Ammon Bundy ("Bundy") answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and

**PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S SECOND  
INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION TO  
DEFENDANT AMMON BUNDY - 1**



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.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include 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 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.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, 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. 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.

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.

### **III. GENERAL INSTRUCTIONS**

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 and interrogatories 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 or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. DEFINITIONS**

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

a. “You,” “Your,” and “Yours,” shall mean Defendant Ammon Bundy, 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.

1. “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.

## V. INTERROGATORIES

**INTERROGATORY NO. 6:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 7:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Plaintiff's discovery requests.

**INTERROGATORY NO. 8:** Please Identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 9:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 10:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).



**INTERROGATORY NO. 11:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 12:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 13:** Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and any Defendant relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and any Defendant regarding the Plaintiffs, and communications between You and any Defendant relating to DHW's intervention involving the Infant.

**INTERROGATORY NO. 14:** Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify

the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, the topic of discussion, and provide each username You used for each site.

**INTERROGATORY NO. 15:** Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People's Rights Network.

**INTERROGATORY NO. 16:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 17:** Please Identify all mobile phones used by You between March 1, 2022 and present by Identifying the phone number, service provider, account number, and Person or entity in whose name the mobile phone is registered with the service provider.

**INTERROGATORY NO. 18:** Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 19:** Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 20:** Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every

documentary, interview, podcast, press conference, rally, or other media appearance You have made.

**INTERROGATORY NO. 21:** Please Identify any evidence, records, communications, correspondence, or other documents that You contend provide factual support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**INTERROGATORY NO. 22:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, committed a crime.

**INTERROGATORY NO. 23:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, are incompetent at their trade or profession.

**INTERROGATORY NO. 24:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 25:** Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations that are owned or controlled by any Defendant in this lawsuit. In answering this Interrogatory, separately Identify which Defendant owns or controls each entity.

**INTERROGATORY NO. 26:** Please Identify all websites that You used to post or directed others to post information regarding the events discussed in the Complaint and provide each Defendants' username for each website.

**INTERROGATORY NO. 27:** Please Identify all aliases, nicknames, or pseudonyms used by You. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

**INTERROGATORY NO. 28:** Please Identify the total amount of money or other things of value donated to, raised by, or collected by You, Defendants, or Defendants' Immediate Families, including any business entity owned or controlled by Defendants or Defendants' Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item donated to each Defendant or each Defendant's Immediate Family, state how that money or item was collected, and state how that money or item is being spent or will be spent.

**INTERROGATORY NO. 29:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money or charitable donations in goods or services raised by You between March 1, 2022, to the present for any of the other Defendants.

**INTERROGATORY NO. 30:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

## **VI. REQUESTS FOR PRODUCTION**

**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 the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**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 Interrogatory.

**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 sent or received related to any public appearance or livestreaming event you participated in or interview you gave where you discussed or talked about the events related to this lawsuit.

**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 all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

**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 of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

**REQUEST FOR PRODUCTION NO. 19:** Please produce, for the time period from January 1, 2022, to the present, all corporate 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 state and federal income tax returns 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 any encounter You had with police at the Meridian St. Luke's hospital on March 11 and/or March 12, 2022.

**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, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 30:** Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

**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 for Governor, 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 Your 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. 37:** Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any

other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Diego Rodriguez relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Diego Rodriguez regarding the Plaintiffs, and communications between You and Defendant Diego Rodriguez relating to DHW's intervention involving the Infant.

**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; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: October 19, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2022, 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 type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

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

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

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #507 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:
--	--

Freedom Man PAC 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:
---	--

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  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
dr238412@me.com  
freedommanpress@protonmail.com

/s/ Erik F. Stidham  
Erik F. Stidham  
OF HOLLAND & HART LLP

20019875\_v1

# **EXHIBIT B**

Erik F. Stidham (ISB #5483)  
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](mailto:efstidham@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  
SYSTEM LTD'S FIRST  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION TO DEFENDANT  
AMMON BUNDY FOR GOVERNOR**

Plaintiff, St. Luke's Health System, LTD, ("Plaintiff"), by and through its attorney of record, hereby request Defendant Ammon Bundy for Governor ("Defendant") answer all interrogatories and produce all documents for inspection and/or copying in accordance with the

**PLAINTIFF ST. LUKE'S HEALTH SYSTEM LTD'S FIRST  
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT  
AMMON BUNDY FOR GOVERNOR - 1**

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.

#### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include 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 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.

#### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, 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. 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.



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.

### **III. GENERAL INSTRUCTIONS**

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 and interrogatories 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 or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### IV. DEFINITIONS

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

1. “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.

## V. INTERROGATORIES

**INTERROGATORY NO. 1:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 2:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Plaintiffs' discovery requests.

**INTERROGATORY NO. 3:** Please Identify each Person You have interviewed or had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 4:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 5:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

**INTERROGATORY NO. 6:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 7:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 8:** Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and any Defendant relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and any Defendant regarding the Plaintiffs, and communications between You and any Defendant relating to DHW's intervention involving the Infant.

**INTERROGATORY NO. 9:** Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify



the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, the topic of discussion, and provide each username You used for each site.

**INTERROGATORY NO. 10:** Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People’s Rights Network.

**INTERROGATORY NO. 11:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 12:** Please Identify all mobile phones used by You between March 1, 2022 and present by Identifying the phone number, service provider, account number, and Person or entity in whose name the mobile phone is registered with the service provider.

**INTERROGATORY NO. 13:** Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 14:** Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 15:** Please Identify every public appearance a representative of You or candidate Ammon Bundy have made from March 1, 2022, to the present including

every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

**INTERROGATORY NO. 16:** Please Identify any evidence, records, communications, correspondence, or other documents that You contend provide factual support of any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**INTERROGATORY NO. 17:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, committed a crime.

**INTERROGATORY NO. 18:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, are incompetent at their trade or profession.

**INTERROGATORY NO. 19:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 20:** Please Identify all websites that You used to post or directed others to post information since March 1, 2022.

**INTERROGATORY NO. 21:** Please Identify the total amount of money or other things of value donated to, raised by, or collected by You, Defendants, or Defendants' Immediate Families, including any business entity owned or controlled by Defendants or Defendants' Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item donated to each Defendant or each Defendant's Immediate Family, state how that money or item was collected, and state how that money or item is being spent or will be spent.

**INTERROGATORY NO. 22:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money or charitable donations in goods or services raised by You between March 1, 2022, to the present for any of the other Defendants.

**INTERROGATORY NO. 23:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

## **VI. REQUESTS FOR PRODUCTION**

**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 the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**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 Interrogatory.

**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; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: October 24, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2022, 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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617

- 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. #507  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC  
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: dr238412@me.com  
freedommanpress@protonmail.com

*/s/ Erik F. Stidham*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

19438634\_v3

# **EXHIBIT C**

Erik F. Stidham (ISB #5483)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
HOLLAND & HART LLP  
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[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto: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; 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  
AMMON BUNDY FOR GOVERNOR**

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 Ammon Bundy for Governor 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,” and “Yours,” shall mean Defendant Ammon Bundy for Governor, and any person or entity 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.

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. 24:** 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. 25:** 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. 26:** Please identify the amounts received from each source of Income identified in response to Interrogatory Number 2, the preceding interrogatory.

**INTERROGATORY NO. 27:** 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. 28:** 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. 29:** 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. 30:** 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. 31:** State Your current Net Worth.

**INTERROGATORY NO. 32:** Identify each limited liability company, partnership, and/or corporate entity in which You are a member or owner.

**INTERROGATORY NO. 33:** Identify each trust of which You are a beneficiary.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 39:** 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. 40:** 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. 41:** 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. 42:** 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. 43:** Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

**REQUEST FOR PRODUCTION NO. 44:** Produce all Documents evidencing or relating to your Assets.

**REQUEST FOR PRODUCTION NO. 45:** Produce all Documents evidencing or relating to your liabilities.

**REQUEST FOR PRODUCTION NO. 46:** 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. 47:** Produce all documents relating to financial transactions involving the People's Rights Network from January 1, 2019 to the present.

**REQUEST FOR PRODUCTION NO. 48:** Produce all documents relating to financial transactions involving You and Diego Rodriguez between January 1, 2019 and the present.

**REQUEST FOR PRODUCTION NO. 49:** Produce all documents relating to financial transactions involving You and the Ammon Bundy between January 1, 2019 and present.

**REQUEST FOR PRODUCTION NO. 50:** Produce all documents relating to Dono Custos, Inc. from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 51:** Produce all documents relating to Abish-husbandi Inc. from January 1, 2019 to present.

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  
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*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21347863\_v1

# **EXHIBIT D**

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](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto: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; 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*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21347878\_v1

# **EXHIBIT E**



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](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto: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; 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 PRESS LLC**

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 Press LLC 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 Press LLC 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. 20:** 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. 21:** 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. 22:** Please identify the amounts received from each source of Income identified in response to Interrogatory Number 2, the preceding interrogatory.

**INTERROGATORY NO. 23:** 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. 24:** 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. 25:** 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. 26:** 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. 27:** State Your current Net Worth.

**INTERROGATORY NO. 28:** Identify each limited liability company, partnership, and/or corporate entity in which you are a member or owner.

**INTERROGATORY NO. 29:** Identify each trust of which you are a beneficiary.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 33:** 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. 34:** 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. 35:** 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. 36:** 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.

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**REQUEST FOR PRODUCTION NO. 42:** Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and the present.

**REQUEST FOR PRODUCTION NO. 43:** 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. 44:** Produce all documents relating to financial transactions involving Power Marketing Consultants LLC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 45:** Produce all documents relating to financial transactions involving Power Marketing Agency, LLC. from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 46:** Produce all documents relating to financial transactions involving Freedom Man PAC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 47:** 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
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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

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- Overnight Mail
- Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21347899\_v1

# **EXHIBIT F**

Erik F. Stidham (ISB #5483)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
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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  
PEOPLE'S RIGHTS NETWORK**

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 People's Rights Network 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,” and “Yours,” shall mean Defendant People’s Rights Network, and any person or entity 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.

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.

**INTERROGATORY NO. 40:** Identify each of Your members.

### **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 People's Rights Network from January 1, 2019 to the present.

**REQUEST FOR PRODUCTION NO. 44:** Produce all documents relating to financial transactions involving You and Diego Rodriguez 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 46:** Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and present.

**REQUEST FOR PRODUCTION NO. 47:** Produce all documents relating to Dono Custos, Inc. from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 48:** Produce all documents relating to Abish-husbandi Inc. from January 1, 2019 to present.

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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

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:
---	--

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:
---	--

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  
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*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21347920\_v1

# **EXHIBIT G**

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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E-mail: [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto: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; 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

**THIRD SET OF INTERROGATORIES  
AND SECOND SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
AMMON BUNDY**

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 Ammon Bundy 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 Ammon Bundy 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. 31:** 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. 32:** 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. 33:** Please identify the amounts received from each source of Income identified in response to Interrogatory Number 2, the preceding interrogatory.

**INTERROGATORY NO. 34:** 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. 35:** 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. 36:** 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. 37:** 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. 38:** State Your current Net Worth.

**INTERROGATORY NO. 39:** Identify each limited liability company, partnership, and/or corporate entity in which You are a member or owner.

**INTERROGATORY NO. 40:** Identify each trust of which You are a beneficiary.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 39:** 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. 40:** 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. 41:** 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. 42:** 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. 43:** Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

**REQUEST FOR PRODUCTION NO. 44:** Produce all Documents evidencing or relating to your Assets.

**REQUEST FOR PRODUCTION NO. 45:** Produce all Documents evidencing or relating to your liabilities.

**REQUEST FOR PRODUCTION NO. 46:** Produce all Documents relating to any real estate transactions that you have been involved in since January 1, 2022 to the present, including, but not limited to, transactions relating to the property at 4615 Harvest Ln., Emmett, Idaho 83617-3601.

**REQUEST FOR PRODUCTION NO. 47:** Produce all documents relating to financial transactions involving the People's Rights Network from January 1, 2019 to the present.

**REQUEST FOR PRODUCTION NO. 48:** Produce all documents relating to financial transactions involving You and Diego Rodriguez between January 1, 2019 and the present.

**REQUEST FOR PRODUCTION NO. 49:** 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. 50:** Produce all documents relating to Dono Custos, Inc. from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 51:** Produce all documents relating to Abish-husbandi Inc. from January 1, 2019 to present.

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	<input checked="" type="checkbox"/>	U.S. Mail
P.O. Box 370	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617-3601	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

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

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

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr. #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
9169 W. State St., Ste. 3177	<input type="checkbox"/>	Overnight Mail
Boise, ID 83714	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	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*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21277626\_v1

# **EXHIBIT H**

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](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto: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; 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

**THIRD SET OF INTERROGATORIES  
AND SECOND SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
DIEGO RODRIGUEZ**

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 Diego Rodriguez 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 Diego Rodriguez 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. 34:** 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. 35:** Please identify all sources and amounts of Income for You from January 1, 2022 to present by stating the name, address, and contact information for each source.

**INTERROGATORY NO. 36:** Identify all Your Assets, including 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, and all 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. 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.

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. 40:** Identify all of Your creditors and debtors. For each creditor and debtor, provide their name, address, nature of the claim, and the amount claimed to be owing. If the amount You claim is different than the amount they claim, include both amounts.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 46:** 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. 47:** 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. 48:** 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. 49:** 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. 50:** Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

**REQUEST FOR PRODUCTION NO. 51:** Produce all Documents evidencing or relating to your Assets.

**REQUEST FOR PRODUCTION NO. 52:** Produce all Documents evidencing or relating to your liabilities.

**REQUEST FOR PRODUCTION NO. 53:** 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. 54:** Produce all documents relating to financial transactions involving the Freedom Tabernacle, Incorporated from January 1, 2019 to the present.

**REQUEST FOR PRODUCTION NO. 55:** Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and the present.

**REQUEST FOR PRODUCTION NO. 56:** 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. 47:** Produce all documents relating to financial transactions involving Power Marketing Consultants LLC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 58:** Produce all documents relating to financial transactions involving Power Marketing Agency, LLC. from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 59:** Produce all documents relating to financial transactions involving Freedom Man Press LLC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 60:** Produce all documents relating to financial transactions involving Freedom Man PAC from January 1, 2019 to present.

**REQUEST FOR PRODUCTION NO. 61:** Produce any and all Documents demonstrating Your interstate and/or international travel from March 11, 2022 through the present.

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*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21281720\_v1

# **EXHIBIT I**



---

**From:** Freedom Man Press <freedommanpress@protonmail.com>  
**Sent:** Tuesday, May 23, 2023 12:23 AM  
**To:** Erik Stidham  
**Subject:** Re: FW: St. Luke's v. Bundy/Rodriguez/Sanctions will be sought against you unless you withdraw frivolous motion.

External Email

Dirty Erik He/Him/His Stidham,

Why are you wasting your client's time and money? Why are you evil in your heart? Why are you a homosexual? Why do you love to love men? It is unnatural and sinful.

**Leviticus 18:22** - *You shall not lie with a male as with a woman; it is an abomination.*

**Leviticus 20:13** - *If a man lies with a male as with a woman, both of them have committed an abomination; they shall surely be put to death; their blood is upon them.*

**Jude 1:7** - *Just as Sodom and Gomorrah and the surrounding cities, which likewise indulged in sexual immorality and pursued unnatural desire, serve as an example by undergoing a punishment of eternal fire.*

**Romans 1:26-28** - *For this reason God gave them up to dishonorable passions. For their women exchanged natural relations for those that are contrary to nature; and the men likewise gave up natural relations with women and were consumed with passion for one another, men committing shameless acts with men and receiving in themselves the due penalty for their error. And since they did not see fit to acknowledge God, God gave them up to a debased mind to do what ought not to be done.*

Why are you such a fag, Dirty Erik He/Him/His? Why? Just Why?

Why did you commit the crime of INTIMIDATION BY FALSE ASSERTION OF AUTHORITY when you threatened Garth Gaylord with contempt of court? Why do you hate obedience to the law? Why are you a criminal who loves to commit crimes? Why did you do it a second time with Robert Jones? Why do you commit crimes repeatedly? Are you a sociopath, a psychopath? Or just a traumatized munchkin fag who got dumped in the garbage can too many times by the high school jocks? It's time to let that go, Dirty Erik.

Why have you perjured yourself? Why have you forced me to file so many bar grievances against you and your Law Firm? Why do you want your insurance rates to go up? Why do you want to be disbarred? Why do you want to force your law firm to fire you so they can preserve their insurance? Why are you so full of wickedness and deceit?

Stop playing games, Dirty Erik. Your gamesmanship and wickedness is coming to an end. Not even the evil staff at St. Luke's can handle your impotence and incompetence anymore. Stop stealing their money! Stop telling lies on TV. Stop defaming Ammon Bundy. Stop being a fag and REPENT, Dirty Erik.

Stop being Dirty Erik He/Him/His Stidham. Repent. You must repent.

Diego Rodriguez  
Freedom Man Press

----- Original Message -----

On Tuesday, May 23rd, 2023 at 12:55 AM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

Your removal is frivolous. As you well know, each of the supposed bases for removal stated in your Notice were rejected by Judge Nye based on longstanding, binding precedent.

You are clearly bringing this for an improper purpose. I assume you are aware of the significance of signing a Notice of Removal subject to Rule 11.

In the state court action, you appeared and even stipulated to a trial setting for July 10, 2023. Even if you had a valid basis for removal (which you do not have), you waived the right to removal long ago. You know that.

What you are trying to do is transparent. You apparently think you can delay things by filing another Notice of Removal with the intention of filing an appeal. This plan of yours will not work.

You are wasting my clients' time and money. If you do not withdraw the Notice of Removal, my clients will seek fees and sanctions against you. The time has come for a jury to resolve the case.

Regards,

**Erik Stidham**

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

**Partner, Holland & Hart LLP**

[efstidham@hollandhart.com](mailto: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.

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**From:** Freedom Man Press <freedommanpress@protonmail.com>  
**Sent:** Monday, May 22, 2023 11:15 PM  
**To:** Janine Korsen <dckorsjp@adacounty.id.gov>  
**Cc:** Erik Stidham <EFStidham@hollandhart.com>  
**Subject:** Re: St. Luke's v. Bundy/Rodriguez

External Email

Hello Janine -

I have just filed a NOTICE TO REMOVE TO FEDERAL COURT which will be personally served to Erik Stidham and the Ada County Courthouse tomorrow, along with its proper filing at the Federal District Court of Idaho.

Pursuant to 28 U.S. Code § 1446(d): "*Promptly after the filing of such **notice of removal** of a civil action the defendant or defendants shall give written notice thereof to all adverse parties and shall file a copy of the notice with the clerk of such State court, which shall effect the removal and the State court shall proceed no further unless and until the case is remanded." Therefore the hearing that was reset for tomorrow must likewise be vacated.*

Thank you.

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Monday, May 22nd, 2023 at 10:28 AM, Janine Korsen <[dckorsjp@adacounty.id.gov](mailto:dckorsjp@adacounty.id.gov)> wrote:

# **EXHIBIT J**

Erik F. Stidham (ISB #5483)  
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](mailto:efstidham@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  
INTERROGATORIES AND FIRST  
REQUESTS FOR PRODUCTION 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") answer all interrogatories 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.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include 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 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.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, 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. 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.

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.

### **III. GENERAL INSTRUCTIONS**

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 and interrogatories 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 or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. 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.

1. “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.

## V. INTERROGATORIES

**INTERROGATORY NO. 6:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 7:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to these discovery requests.

**INTERROGATORY NO. 8:** Please Identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 9:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 10:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

**INTERROGATORY NO. 11:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 12:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 13:** Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

**INTERROGATORY NO. 14:** Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify

the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

**INTERROGATORY NO. 15:** Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People's Rights Network.

**INTERROGATORY NO. 16:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 17:** Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 18:** Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 19:** Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

**INTERROGATORY NO. 20:** Please Identify any evidence, records, communications, correspondence, or other documents that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**INTERROGATORY NO. 21:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs committed a crime.

**INTERROGATORY NO. 22:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs are incompetent at their trade or profession.

**INTERROGATORY NO. 23:** Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations You own or control.

**INTERROGATORY NO. 24:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 25:** Please Identify all websites that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

**INTERROGATORY NO. 26:** Please Identify all applications, including, but not limited to messaging applications or social media platforms like Telegram, MeWe, Rumble, and Gab, that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.



**INTERROGATORY NO. 27:** Please Identify all aliases, nicknames, or pseudonyms You have used from January 1, 2022, to the present. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

**INTERROGATORY NO. 28:** Please Identify the total amount of money or other things of value donated to, raised by, received by, or collected by You or Your Immediate Family, including any business entity owned or controlled by You or Your Immediate Family, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item of value donated to You and/or the amount of money donated to each Immediate Family member, state how that money was collected, and state how that money is being spent or will be spent.

**INTERROGATORY NO. 29:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money charged to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 30:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of liability incurred by the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 31:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 32:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance

coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 33:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

## **VI. REQUESTS FOR PRODUCTION**

**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 the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**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, communications, 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 Interrogatory.

**REQUEST FOR PRODUCTION NO. 8:** Please produce all documents provided by You to 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 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. 10:** 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. 11:** 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. 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 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. 14:** Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, you sent or received related to any public appearance or livestreaming event you participated in or interview you gave where you discussed or talked about the events related to this lawsuit.

**REQUEST FOR PRODUCTION NO. 15:** 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. 16:** Please produce all documents, specifically including text messages, emails, or other communications, exchanged between You and any Defendant in this lawsuit, including all present and former agents and employees of any Defendant, that relate to the matters set forth in the Complaint or Answer.

**REQUEST FOR PRODUCTION NO. 17:** Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

**REQUEST FOR PRODUCTION NO. 18:** 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. 19:** Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of

organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

**REQUEST FOR PRODUCTION NO. 20:** Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any entity owned, operated, or controlled by You.

**REQUEST FOR PRODUCTION NO. 21:** Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, and any other business or entity through which you generate income, express ideas, or interact with the public.

**REQUEST FOR PRODUCTION NO. 22:** Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Ammon Bundy or any entity or association owned or controlled by Ammon Bundy, including but not limited to the People Rights Network and Abish-Husbandi, Inc.

**REQUEST FOR PRODUCTION NO. 23:** Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

**REQUEST FOR PRODUCTION NO. 24:** Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

**REQUEST FOR PRODUCTION NO. 25:** 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. 26:** Please produce all documents or communications You received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations.

**REQUEST FOR PRODUCTION NO. 27:** 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. 28:** 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. 29:** Please produce all video or audio recordings relating to any encounter You had with police or DHW on March 11, 2022, including any recordings taken when police visited Your house.

**REQUEST FOR PRODUCTION NO.30:** Please produce all organizational documents relating to the People Against Child Trafficking organization (P.A.C.T.) See.

<https://freedomman.org/cyrus/pact-rally/>

**REQUEST FOR PRODUCTION NO. 31:** 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 or attended between March 11, 2022, to the present that relates in any way to the events of this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Complaint.

**REQUEST FOR PRODUCTION NO. 32:** Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

**REQUEST FOR PRODUCTION NO. 33:** 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 any Person 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. 34:** 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 or support relating in any way to the events described in the Complaint.

**REQUEST FOR PRODUCTION NO. 35:** Please produce all documents showing money or funds or things of financial value donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the donor, amount of donation, date of donation, and any messages received with the donation.

**REQUEST FOR PRODUCTION NO. 36:** Please produce all documents showing the disposition, transfer, or use of money or funds donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the person or entity receiving the funds, the date the person or entity received the funds, and the amount of the funds.

**REQUEST FOR PRODUCTION NO. 37:** 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 Ammon Bundy, Defendant Ammon Bundy for PLAINTIFF ST. LUKE’S HEALTH SYTEM, LTD’S SECOND INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION TO DEFENDANT DIEGO RODRIGUEZ - 19

Governor, 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. 38:** 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. 39:** 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 Defendant 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. 40:** 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. 41:** Please produce all documents and communications received from any "whistleblowers" as discussed in your April 29, 2022 article on freedomman.org entitled "Insider Information from a Whistleblower!".



**REQUEST FOR PRODUCTION NO. 42:** Please produce all documents demonstrating or showing the changes or updates to the freedomman.org website from March 1, 2022 through the present.

**REQUEST FOR PRODUCTION NO. 43:** Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

**REQUEST FOR PRODUCTION NO. 44:** Please produce copies of any and all registered copyrights that You or any entity under Your control have including, but not limited to, any registered copyright associated with the freedomman.org website or any registered copyright associated with the [contact@freedomman.org](mailto:contact@freedomman.org) email account.

**REQUEST FOR PRODUCTION NO. 45:** 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; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: October 7, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2022, 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
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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: [dr238412@me.com](mailto:dr238412@me.com);  
[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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