

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
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,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS' SUPPLEMENTAL
EXPERT WITNESS DISCLOSURES**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and

through their attorneys of record, Holland & Hart LLP, hereby submit their supplemental disclosure of expert witnesses, which identifies the witnesses who may provide expert testimony at the trial of the above-captioned case. This disclosure is made in accordance with the Court's Notice of Trial Setting and Order Governing Further Proceedings dated October 17, 2022, and pursuant to Rule 26(b)(4) of the Idaho Rules of Civil Procedure.

I. RETAINED EXPERT WITNESSES

A. JESSICA FLYNN

1. Statement of Testimony:

A statement of opinions to be expressed and the basis and reasons for the opinions is set forth in Ms. Flynn's report attached as **Exhibit A**.

2. Data and Information Considered in Forming Testimony:

A list of the data and other information considered by Ms. Flynn in forming her opinions is set forth as an Appendix to **Exhibit A**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Ms. Flynn may use as an exhibit any portion of her report and any materials referenced in the appendices to **Exhibit A**. She may also rely on any other expert's report.

4. Qualifications of Ms. Flynn:

Ms. Flynn's qualifications, including a list of all publications authored by her within the preceding ten years, and all cases in which she has testified as an expert in the preceding four years, are set forth in her CV, attached as an Appendix to **Exhibit A**.

5. Compensation Paid to Ms. Flynn:

Ms. Flynn is being compensated at an hourly rate of \$200.

B. CAMILLE LACROIX, MD, DFAPA

1. Statement of Testimony:

A statement of opinions to be expressed and the basis and reasons for the opinions is set forth in Dr. LaCroix's report attached as **Exhibit B**.

2. Data and Information Considered in Forming Testimony:

A list of the data and other information considered by Dr. LaCroix in forming her opinions is set forth in Dr. LaCroix's report attached as **Exhibit B**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Dr. LaCroix may use as an exhibit any portion of her report and any materials referenced in **Exhibit B**. She may also rely on any other expert's report.

4. Qualifications of Dr. LaCroix:

Dr. LaCroix's qualifications, including a list of all publications authored by her within the preceding ten years, and all cases in which she has testified as an expert in the preceding four years, are set forth in her CV, attached as an Appendix to **Exhibit B**.

5. Compensation Paid to Dr. LaCroix:

Dr. LaCroix is being compensated at the hourly rate of \$400 for all services but travel time (compensated at an hourly rate of \$250) and testimony (compensated at an hourly rate of \$600).

C. MICHAEL WHEATON, MD

1. Statement of Testimony:

A statement of opinions to be expressed and the basis and reasons for the opinions is set forth in Dr. Wheaton's report attached as **Exhibit C**.

2. Data and Information Considered in Forming Testimony:

A list of the data and other information considered by Dr. Wheaton in forming his opinions is set forth as an Appendix to **Exhibit C**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Dr. Wheaton may use as an exhibit any portion of his report and any materials referenced in the appendices to **Exhibit C**. He may also rely on any other expert's report.

4. Qualifications of Dr. Wheaton:

Dr. Wheaton's qualifications, including a list of all publications authored by him within the preceding ten years, and all cases in which he has testified as an expert in the preceding four years, are set forth in his CV, attached as an Appendix to **Exhibit C**.

5. Compensation Paid to Dr. Wheaton:

Dr. Wheaton is being compensated at the hourly rate of \$500.

D. DENNIS REINSTEIN, CPA

1. Statement of Testimony:

A statement of opinions to be expressed and the basis and reasons for the opinions is set forth in Mr. Reinstein's report attached as **Exhibit D**.

2. Data and Information Considered in Forming Testimony:

A list of the data and other information considered by Mr. Reinstein in forming his opinions is set forth in **Exhibit D**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Mr. Reinstein may use as an exhibit any portion of his report and any materials referenced in **Exhibit D**. He may also rely on any other expert's report.

4. Qualifications of Mr. Reinstein:

Mr. Reinstein's qualifications, including a list of all publications authored by him within the preceding ten years, and all cases in which he has testified as an expert in the preceding four years, are set forth in his CV, attached as an Appendix to **Exhibit D**.

5. Compensation Paid to Mr. Reinstein:

Mr. Reinstein is being compensated at an hourly rate of \$500.

E. DEVIN BURGHART

1. Statement of Testimony:

Mr. Devin Burghart will testify and express opinions, consistent with those contained in his report, "Ammon's Army: Inside the Far-Right People's Rights Network." His report is attached hereto as **Exhibit E**.

Mr. Burghart will testify regarding his findings and conclusions relating to the formation of People's Rights Network ("PRN"), the structure of PRN, the objectives of PRN, the dangers posed by PRN, Ammon Bundy and his entities' roles in PRN, Diego Rodriguez and his entities' roles in PRN, and PRN's messaging and use of false conspiracies to push its agenda. He will testify regarding the actions taken and tactics employed by the Defendants to manufacture a false conspiracy and to publish false statements to harass and incite violence against the Plaintiffs. Mr. Burghart will testify regarding how the Defendants acted in concert to generate publicity and revenue for themselves based on the false statements and false conspiracies targeting the Plaintiffs.

Mr. Burghart will testify to the following opinions and conclusions:

- a. Ammon Bundy founded and built PRN into a nationwide network that they assert has over 60,000 members. PRN's growth has been spurred by a fusion of Bundy's core of

the far-right paramilitary supporters built up over years of armed standoffs with a mass base of new activists radicalized in protest over COVID-19 health directives.

b. PRN's objectives are to take over the government to impose its radical far-right vision on people. PRN declares a desire for governmental power to be used to protect the "righteous" against the "wicked". PRN seeks to establish a type of armed enclave-style "neighborhood" nationalism, where "righteous" neighbors stand against the "wicked." PRN defines the "wicked" using far-right conspiracism, racism, antisemitism, anti-indigenous, and anti-transgender sentiment.

c. Bundy controls PRN. The organization is a fairly typically structured extremist group. Bundy sits atop the hierarchy—though in an unnamed, unspecified position. He is the main spokesperson for the group, and it appears that he has complete access to all the individual member information. Bundy is the network's leader and directs and promotes the network. Bundy oversees state and area assistants—those charged with coordinating activities and controlling access to information. PRN has a substantial and active Idaho chapter that Ammon Bundy leads and oversees.

d. Diego Rodriguez is a key figure in PRN. He is a frequent speaker at PRN events, including early meetings that gave rise to the organization. Rodriguez is an active member in PRN, facilitates the network's growth, and coordinates PRN's messaging and communications with Bundy. While having less authority than Bundy, Rodriguez speaks for the network and acts on the network's behalf.

e. Rodriguez is the founder of the Freedom Tabernacle Church in Boise, Idaho. The church promotes "Christian Dominion," described as "the duty of taking dominion over the Earth"; the objective being to impose his version of Christianity on all. Christian

Dominionism is a form of Christian nationalism, arguing that Christians should take the reins of political and cultural power. Rodriguez's Boise-based Dominion Books is dedicated to "equipping believers to take dominion in this world." Rodriguez also serves as the Communications and Marketing Director for the Freedom Man Political Action Committee and operates the Freedom Man website. See <https://freedomman.org/>.

Rodriguez contends that "[h]omosexuality is an abomination unto God and to all Christians." One tenet of Christian Dominionism is that "Biblical law" demands the death penalty for members of the LGBTQ community and other forms of governmental punishment for the "wicked". Rodriguez frequently uses antisemitic canards in his calls for "Christian Dominion". Rodriguez promotes policy positions in line with Cleon Skousen's National Center for Constitutional Studies, including opposing "state-run educational institutions" which Rodriguez contends have no authority in the "Word of God". Rodriguez states that "welfare, food stamps, subsidized housing, state run health care (i.e., Medicare, etc.), social security and publicly funded education" must be destroyed as an "unlawful expansion of state government into areas of life that are ordained by God to be fulfilled by church and families." Rodriguez has a long history of self-promotion, seeking financial gain and has desperately sought political relevance. He advertises himself as a skilled marketer and frequently uses his family to promote himself, his personal brand, and his various financial schemes.

- f. In addition to PRN, Bundy and Rodriguez worked together on the Bundy for Governor Campaign. PRN was intertwined with the Bundy for Governor Campaign, as was Rodriguez's Freedom Man website.

- g. Bundy, Rodriguez, and PRN pose a real and present danger to the community and to public servants. While Bundy, Rodriguez, and PRN speak in terms of “defending rights”, they define “defense” and “rights” in such a way that they really are just advocating the use of violence to reach their objective of imposing their desired type of Christian Nationalist government on others. PRN’s leadership and membership includes paramilitary and militia-type group members. PRN was established—and operates—as an “Uber-like” militia response system. PRN’s messaging is intended to incite fear and promote violence. PRN uses harassment, intimidation, threats of violence, and doxing to silence those it opposes and push its agenda. PRN is willing and able to use violence to accomplish its objectives.
- h. PRN has had and maintains active financial connections with entities controlled by Bundy and Rodriguez. PRN solicits “donations” from members, and those donations are funneled through corporations owned by Bundy and Rodriguez. *Dono Custos, Inc.*, an entity owned and controlled by Bundy, is used to funnel money in and out of PRN. Similarly, *Freedom Tabernacle, Incorporated*, an entity owned and controlled by Rodriguez, is used to funnel money in and out of PRN. PRN uses conspiracy theories and false narratives to attract members, radicalize its base, push its agenda, gather donations, and incite fear and violence.
- i. Bundy, Rodriguez, and PRN are aligned with a network of other extremist groups.
- j. Bundy, Rodriguez, PRN, the Bundy for Governor Campaign, and the Freedom Man website, coordinated and created a false conspiracy theory that the police, the Governor of Idaho, the Idaho Department of Health and Welfare, St. Luke’s hospital, Chris Roth, Dr. Natasha Erickson, Tracy Jungman, and others, participated in a kidnapping and a

child trafficking ring. They promoted the incendiary, false conspiracy that St. Luke's, Roth, Dr. Erickson, and Jungman were criminals who acted to facilitate and profited from the kidnapping of healthy children from "Christian" families and trafficking of those children to "homo-sexuals" who sexually abused and killed the children. PRN's creation of this false conspiracy theory is typical of how PRN usually operates, which is to create a false narrative in order to garner publicity, recruit members, enrage members, incited violence, manipulate members to act, silence its opposition, and garner donations to enrich itself.

- k. PRN, through Bundy and Rodriguez, pushed its false conspiracy theory in order to attract members, radicalize its base, grow its political capital, intimidate and harm the entities and individuals identified, and financially enrich itself and its leaders, including Bundy and Rodriguez.
- l. PRN, Bundy, Rodriguez, the Bundy for Governor Campaign, and the Freedom Man website employed language and messages which incited fear and promoted violence or the threat of violence against the individuals and entities identified. This threat of violence was real, and it was—and is—substantial. The threats posed by PRN, Rodriguez, Bundy, and the Freedom Man website are omnipresent. PRN's membership consists of armed paramilitary and militia-type members who are willing and able to use threats, violence, and force to silence its targets. PRN's coordinated use of false messaging and its armed and dangerous members presented—and continue to present—a dangerous risk to St. Luke's, Dr. Erickson, Roth, and Jungman.

- m. PRN intended to and did dox, intimidate, scare, harass, and threaten St. Luke's Health System and its staff and patients. This coordinated attack was led, orchestrated, and promoted by PRN leaders, including Bundy and Rodriguez.
- n. Almost one year after the armed gatherings at St. Luke's that caused the lockdown of the hospital, PRN, Bundy, Rodriguez, and the Freedom Man website maintain the false narratives, and continue to repeat and amplify the false and incendiary conspiracies to further endanger St. Luke's and others and to radicalize more intended members of PRN to take action by threatening others and by making financial contributions to the network.

2. Data and Information Considered in Forming Testimony:

A list of the data and other information considered by Mr. Burghart in forming his opinions is set forth as an Appendix to **Exhibit E**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Mr. Burghart may use as an exhibit any portion of his report and any materials referenced in the appendices to **Exhibit E**. He may also rely on any other expert's report.

4. Qualifications of Mr. Burghart:

Mr. Burghart's qualifications, including a list of all publications authored by him within the preceding ten years, and all cases in which he has testified as an expert in the preceding four years, are set forth in his CV, attached as an Appendix to **Exhibit E**.

5. Compensation Paid to Mr. Burghart:

Mr. Burghart is not being personally compensated. The Institute for Research & Education on Human Rights is being compensated at the rate of \$300.00 per hour including any testimony at deposition or trial.

F. SPENCER FOMBY

1. Statement of Testimony:

At statement of opinions to be expressed and the basis and reasons for the opinions is set forth in Mr. Fomby's report attached as **Exhibit F**.

2. Data and Information Considered in Forming Testimony:

A list of the data and other information considered by Mr. Fomby in forming his opinions is set forth in **Exhibit F**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Mr. Fomby may use as an exhibit any portion of his report and any materials referenced in **Exhibit F**. He may also rely on any other expert's report.

4. Qualifications of Mr. Fomby:

Mr. Fomby's qualifications, including a list of all publications authored by him within the preceding ten years, and all cases in which he has testified as an expert in the preceding four years, are set forth in his CV, attached as an Appendix to **Exhibit F**.

5. Compensation Paid to Mr. Fomby:

Mr. Fomby is being compensated at an hourly rate of \$300 for all services except deposition appearance (hourly rate of \$450), trial appearance (\$2500 per day non-testifying, \$3500 per day testifying), and travel time (\$1500 per day plus expenses \$0.545 per mile).

G. TYLER JOHNSON

1. Statement of Testimony:

A statement of opinions to be expressed and the basis and reasons for the opinions is set forth in Mr. Johnson's report attached as **Exhibit G**.

2. Data and Information Considered in Forming Testimony:

The data and other information considered by Mr. Johnson in forming his opinions is set in **Exhibit G**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Mr. Johnson may use as an exhibit any portion of his report and any materials referenced in **Exhibit G**. He may also rely on any other expert's report.

4. Qualifications of Mr. Johnson:

Mr. Johnson's qualifications, including his licenses and experience is set forth on page 7 of **Exhibit G**. Mr. Johnson has not served as a testifying expert in any trial or matter in the past four years.

5. Compensation Paid to Mr. Johnson:

Mr. Johnson is being compensated at the market rate for broker price opinions and will be compensated a commiserate hourly rate for any trial testimony.

H. SOUTHERN POVERTY LAW CENTER – MEGAN SQUIRE AND JASON WILSON

1. Statement of Testimony:

Ms. Squire and/or Jason Wilson of Southern Poverty Law Center will testify as to opinions and information set forth in the article that appears as **Exhibit H**.

2. Data and Information Considered in Forming Testimony:

The data and other information considered by Ms. Squire and Jason Wilson in forming their opinions is set in **Exhibit H**.

3. Exhibits that May Be Used as a Summary of or Support for Testimony:

Ms. Squire and/or Jason Wilson may use as an exhibit any portion of the article and any materials referenced or relied on to prepare the article that appears as **Exhibit H**. They may also rely on any other expert's report.

4. Qualifications of Ms. Squire and Mr. Wilson:

Megan Squire is the Deputy Director for Data Analytics and OSINT at Southern Poverty Law Center. Jason Wilson is a journalist and investigative reporter with Southern Poverty Law Center.

5. Compensation Paid to Ms. Squire and Mr. Wilson:

Ms. Squire and Mr. Wilson have not been compensated by Plaintiffs for use of the opinions, information, and knowledge set forth in **Exhibit H**; it is a publicly available document. However, to the extent Ms. Squire and/or Mr. Wilson are compensated for trial testimony or other work for Plaintiffs, they will be compensated at an agreed upon rate commiserate with the market.

II. NON-RETAINED EXPERT WITNESSES

Plaintiffs disclose the following witnesses in an abundance of caution. Much of the following witnesses' testimony will be factual, as each individual has personal knowledge of the facts underlying this case. Plaintiffs understand, however, that some of the testimony will involve both factual statements and opinions regarding the following witnesses' respective scientific, technical, or other specialized knowledge, helpful to the trier of fact.

A. NATASHA ERICKSON, M.D.

Dr. Erickson is a pediatric hospitalist at St. Luke's Regional Medical Center and has 12 years' experience in pediatric care. Dr. Erickson has extensive experience in diagnosing and treating children. In the course of her job responsibilities, Dr. Erickson provides inpatient medical care for hospitalized infants, children, and adolescents.

Dr. Erickson is familiar with the care St. Luke's provided the Infant, including the Infant's diagnoses and plan for treatment. She is also familiar with the harm suffered by her and her family as a result of Defendants' conduct and the measures she has been forced to take to deal with the risk of harm posed by Defendants.

Dr. Erickson has a Bachelor of Science degree in Biology from the University of Puget Sound and a medical degree from Eastern Virginia Medical School. She completed a post graduate internship in pediatrics and a residency in pediatrics at Eastern Virginia Medical School. During the first year of her residency, Dr. Erickson was awarded the Outstanding First Year Resident Award, and she was later selected to serve as chief resident. She has served on several committees related to patient safety and quality of care and is actively involved in resident and nursing education, having received an award for pediatric teaching excellence. Dr. Erickson is licensed by the Idaho Board of Medicine and the Idaho Board of Pharmacy and is a current member of the American Academy of Pediatrics. She is Board Certified in General Pediatrics and in Pediatric Hospital Medicine.

In addition to testifying about the personal effect Defendants' actions have had on Dr. Erickson and her family, Dr. Erickson will testify that she and her family suffered reputational, financial, and emotional harm due to Defendants' actions and have taken increased security measures due to the risks posed by Defendants. Dr. Erickson and her family have experienced disruptions in their day-to-day living owing to Defendants' conduct. Dr. Erickson experienced symptoms indicative of PTSD owing to Defendants' conduct.

Dr. Erickson will testify that at the time she was directly involved in the Infant's care the Infant's parents consented to all aspects of care, that the treatment plan for the Infant during the Infant's admission to St. Luke's Boise from March 1-4, 2022, met all applicable standards of

care and was in the best interests of the Infant, and that the Infant was not vaccinated by St. Luke's at any time.

Dr. Erickson will also testify that she never contacted DHW and did not ask anyone to contact DHW regarding the Infant. Dr. Erickson did ask for a social worker to consult with the parents of the Infant regarding financial need and other issues.

Some of Dr. Erickson's testimony will rely on her expertise, including the following:

1. The medical condition and treatment provided to the Infant in March 2022. She will testify regarding her opinion that the Infant needed the medical evaluation and treatment that the Infant received at St. Luke's.
2. St. Luke's Health System's practices and procedures regarding admission, diagnoses, and treatment, and the hospital's reporting requirements. She will testify that, as it relates to the care she provided, she properly followed all relevant practices, procedures, and reporting categories relating to the Infant.
3. The Infant needed medical intervention because of the Infant's severe condition at the time of admittance.
4. The diagnoses, treatment plan, and care provided to the Infant was competent and in the best interests of the Infant. The Infant suffered from severe malnutrition and dehydration which, if left untreated, could have had serious health and development consequences.
5. The Infant's treatment was hampered by the Infant's parents' refusal to provide basic medical history about the Infant and failure to properly characterize prior medical care received by the Infant.

6. Dr. Erickson will testify regarding the medical record that she generated or referred to relating to the medical care provided to the Infant.
7. Dr. Erickson may also refer to and testify regarding other medical records relating to the Infant's care and condition.
8. Dr. Erickson will testify that all aspects of care (including examination, evaluation, diagnosis, and treatment) that she provided to the Infant met the applicable standard of care.
9. Dr. Erickson will testify that the examination, imaging, and testing of the Infant that occurred at St. Luke's was appropriate and met the standard of care.

B. TRACY JUNGMAN, NURSE PRACTITIONER

Ms. Jungman is a nurse practitioner specializing in pediatrics at St. Luke's CARES in Boise, Idaho. She has over 20 years' experience in pediatric nursing and has provided assistance to over 1,700 patients in the last five years alone. She has extensive clinical experience in various inpatient and outpatient settings including PICU and Child Abuse Pediatrics. In the course of her job responsibilities, Ms. Jungman evaluates and treats children that may be victims of abuse, neglect, or other forms of maltreatment, and she is regularly called to testify in court in child abuse cases because of her expertise in recognizing and treating victims of child abuse and neglect.

Ms. Jungman is familiar with the events leading up to DHW's decision to contact the Meridian Police about the Infant on March 11, 2022, the measures St. Luke's CARES took to protect staff and patients during the March 2022 protests at St. Luke's, the care St. Luke's provided the Infant, the practices and procedures involved in child protection cases, the harm she

and her family suffered as a result of Defendants' conduct, and the additional security measures she has taken to deal with the risk of harm posed by Defendants.

Ms. Jungman has a Bachelor of Science degree in Nursing from Boise State University and a Master of Science degree in Nursing from Clarkson College. She has substantial post graduate education in pediatric medicine, focusing on survivors of child abuse. Ms. Jungman facilitates the Idaho Child Abuse peer review for medical providers statewide, and frequently provides regional and statewide education to various entities regarding the identification, evaluation, and treatment of victims of child maltreatment.

Ms. Jungman will testify that she and her family suffered reputational, financial, interpersonal, and emotional harm due to Defendants' actions and have had to increase security due to the risks posed by Defendants. Ms. Jungman will also testify that she and her family have experienced disruptions in their day-to-day living owing to Defendants' conduct. Ms. Jungman will also testify that she experienced symptoms indicative of PTSD owing to Defendants' conduct.

In addition to testifying about the personal effect Defendants' actions have had on Ms. Jungman and her family, Ms. Jungman is expected to present evidence on the subject matter of St. Luke's role in DHW investigations and proceedings, St. Luke's medical advice regarding the Infant, the Infant's condition on March 12, 2022, the care that St. Luke's provided to the Infant in March 2022, and the interactions between St. Luke's and the Infant's parents.

Some of Ms. Jungman's testimony will rely on her expertise and will include testimony expressing an expert opinion, including the following:

1. Ms. Jungman and others she observed providing care complied with St. Luke's Health System's practices and procedures regarding admission, diagnoses,

treatment, and DHW consultations and evaluations, and the hospital's reporting requirements.

2. The Infant needed medical intervention because of the Infant's severe condition at the time of admittance. At the time the Infant was admitted to St. Luke's, the Infant was severely malnourished, dehydrated, and was failing to thrive.
3. The treatment plan and care provided to the Infant by St. Luke's was competent and in the best interests of the Infant. If the Infant had not received care, the Infant could have died or suffered serious health and developmental consequences.
4. The Infant's treatment was hampered by the Infant's parents' refusal to provide basic medical history about the Infant.
5. Ms. Jungman will testify regarding the medical record that she generated or referred to relating to the medical care provided to the Infant.
6. Ms. Jungman may also refer to and testify regarding other medical records relating to the Infant's care and condition.
7. Ms. Jungman will testify that all aspects of the care (including examination, evaluation, diagnosis, and treatment) that she provided to the Infant met the applicable standard of care.

C. CHRIS ROTH, CEO, ST. LUKE'S HEALTH SYSTEM LTD.

Mr. Roth is the current president and CEO of St. Luke's Health System. He has 30 years' experience in health care and has extensive experience in health care operations, emerging technologies, care delivery and care models, and consumer experience. In the course of his job responsibilities, Mr. Roth administers the hospital network which includes, among other things, managing over 14,000 employees, creating business strategies, and overseeing St. Luke's Health

System's day-to-day operations. Mr. Roth reports to the St. Luke's Health System Board of Directors.

Mr. Roth has a Bachelor of Science degree from Utah State University and a master's degree in health-care administration from the University of Minnesota. He has more than 30 years of healthcare experience.

Mr. Roth is familiar with the economic and reputational harm suffered by St. Luke's Health System due to Defendants' actions, the effect Defendants' actions have had on employee productivity and morale, the security measures St. Luke's has been forced to take to protect its building, its staff, and its patients from the ongoing threats caused by Defendants, and the overall effect Defendants' actions have had on the day-to-day operations of the hospital.

Mr. Roth will testify about the personal effect the Defendants' actions have had on him and his family. Mr. Roth is expected to present evidence on the impact the Defendants' conduct has had on the health system's ability to fulfill its mission and its day-to-day operations.

Some of Mr. Roth's testimony will rely on his expertise and will include testimony expressing an expert opinion, including the following:

1. The health system's mission and the need to operate in an economically efficient way in order to fulfill that mission.
2. The health system's response to the threat posed by Defendants, including the need to lockdown and divert patients to other alternative health care providers on March 15, 2022, the need to implement "incident command" during and after the March 2022 protests, the need to monitor and deal with crowds of Defendants' followers, the need to take steps to protect providers and staff including the need to remove staff and provider profiles from the health system's website, the need to

expend resources on public relations support to mitigate damages and correct misconceptions, and the need to increase security due to the threat posed by the Defendants including the need to add security personnel and make infrastructure improvements.

3. The health system experienced operational disruption due to Defendants' false statements and actions. The health system was required to divert staff and executives from their job responsibilities to deal with the security threat. Patients were prevented from obtaining needed care. Staff questioned their willingness to continue serving in their roles out of concern for their safety. And recruits were dissuaded from accepting jobs with St. Luke's Health System.
4. The health system suffered reputational and financial harm due to Defendants' false statements and actions, and this harm negatively impacted both the hospital and the community the hospital serves.
5. St. Luke's Health System suffered a loss of employee productivity and morale due to Defendants actions in March 2022.

D. KATE FOWLER, CHIEF FINANCIAL OFFICER, ST. LUKE'S HEALTH SYSTEM LTD.

Ms. Fowler is the current CFO of St. Luke's Health System and a certified public accountant. She has over 20 years' experience in accounting and finance for large organizations, including non-profit and health care institutions. Ms. Fowler oversees all accounting and finance personnel employed by St. Luke's Health System. She monitors and analyzes the finances of, and financial impacts to, the health system and reports directly to Mr. Roth, the St. Luke's Health System CEO, and also provides reporting to the St. Luke's Health System Board of Directors. In the course of her job responsibilities, she has become, and remains, familiar with the health

system's accounting processes, financial data, and the economic harm suffered by the health system due to Defendants' disruptions and intimidation.

Ms. Fowler has a BA in Accounting and Business Administration from the College of Idaho and an MBA from Northwest Nazarene University. She began her career as an Auditor for a bank, then Senior Consultant for an accounting firm. Ms. Fowler then transitioned into management positions with Ernst & Young for over five years. Her career then took her into the medical field where she served as a Controller / Director, Health Information Management, transitioning into Chief Financial Officer at West Valley Medical Center. She started employment with St. Luke's Health System in 2015, where she first served as Finance Administrator – West Region, then Finance Administrator – Provider Operations. Her next position was Vice President Operational Finance. Ms. Fowler's current position is SVP, Chief Financial Officer. Ms. Fowler is expected to present evidence on the subject matter of the financial impact to St. Luke's Health System due to Defendants' conduct (the March 2022 disruptions at the Boise and Meridian Emergency Departments and ongoing threat Defendants perpetuate).

Some of Ms. Fowler's testimony will rely on her expertise and will include testimony expressing an expert opinion, including the following:

1. St. Luke's Health System suffered economic losses due to Defendants' March 2022 disruptions at St. Luke's Boise and Meridian campuses. The health system lost revenue due to increased canceled patient appointments and delayed care in numbers far higher than the normal rate of cancelation.
2. The health system has increased security due to the Defendants' disruptions in March 2022 and the ongoing threats, harassment and smear campaign in which

Defendants have engaged. These increases in security include infrastructure improvements, installation and licensing of access software, and added security personnel.

3. The data underlying retained expert Dennis Reinstein's report setting forth economic damages is reliable, accurate, and properly supports the damages sought.

E. C.P. "ABBEY" ABBONDANDOLO, SENIOR DIRECTOR OF SECURITY, ST. LUKE'S HEALTH SYSTEM, LTD.

Mr. Abbondandolo is the Senior Director of Security for St. Luke's Health System in Boise, Idaho, and has over 40 years' experience in security operations, including in law enforcement working for a major police department and as head of security for a major hospital in Houston, Texas. Mr. Abbondandolo oversees all security personnel employed by St. Luke's Health System, directs and manages St. Luke's Threat Assessment Team, monitors and analyzes security risks, and designs and implements security protocols. In the course of his job responsibilities, Mr. Abbondandolo has become, and remains, familiar with the health system's security response and security operations, and the economic harm related to security that the hospital system suffered due to Defendants' disruptions and intimidation.

Mr. Abbondandolo is expected to present evidence on the subject matter of the operational and financial impact from a security standpoint to St. Luke's Health System due to Defendants' conduct (the March 2022 disruptions at the Boise campus and Meridian Emergency Departments and ongoing threat Defendants perpetuate). Mr. Abbondandolo will also testify about how Defendants' threats have been managed, during March 2022, and through the present. He will testify about security policies and practices.

Some of Mr. Abbondandolo's testimony will rely on his expertise and will include testimony expressing an expert opinion, including the following:

1. St. Luke's Health System was forced to invest substantial sums of money in additional security measures in order to defend itself, its staff, and its patients against the ongoing threat posed by Defendants. These additional security measures include increased security personnel and new security infrastructure.
2. The threat posed by Defendants was real and was substantial. It presented a real and present danger to the safety of patients and staff. There were several hundred protestors that gathered outside the Boise hospital, many of which were armed. A nationwide protest phone call campaign was organized by Defendants. External law enforcement agencies, including the Boise Police Department, the Idaho State Police Department, and the Federal Bureau of Investigation advised on and/or helped mitigate the threat, but that was not enough to eliminate the threat or prevent a breach of the hospital.
3. The hospital system was required to divert attention and resources to manage the risks posed by Defendants, meaning that regular and important work was delayed or cancelled.
4. The additional security measures the hospital system invested in were necessary in order to combat the threat posed by Defendants and to keep the hospital system's facilities safe for staff, patients, and the community.
5. The additional security measures would not have been needed but for the threat posed by Defendants.

6. Prior to the events giving rise to the lawsuit, the hospital system's security measures were sufficient for responding to the threats the hospital faced and were on par with what other similarly situated hospital systems were doing in regard to security. The hospital system had successfully responded to protests in the past, most notably the protests related to the COVID-19 pandemic, and it had successfully mitigated and eliminated threats posed by combative individuals. However, the threat posed by Defendants exceeded all previous threats, was beyond what any hospital system such as St. Luke's could reasonably prepare for, and created the need for additional security resources.
7. St. Luke's Health System has and follows reasonable policies, procedures, or practices relating to security training, security operations, and emergency response.

F. DENNIS MESAROS, VICE PRESIDENT OF POPULATION HEALTH, ST. LUKE'S HEALTH SYSTEM

Mr. Mesaros is the Vice President of Population Health for St. Luke's Health System, and he serves as the regional operational leader for St. Luke's Regional Medical Center, St. Luke's Elmore Medical Center, and St. Luke's McCall Medical Center. Mr. Mesaros oversees quality of care, patient outcomes, patient experience, stewardship, and the safety and wellbeing of staff and patients, and he is occasionally called upon to respond to high level emergency situations and events that impact hospital operations. In the course of his job responsibilities, Mr. Mesaros has become, and remains, familiar with the health system's emergency response procedures, patient care policies, practices and procedures, and facility operations.

Mr. Mesaros has a Bachelor of Arts in Economics from the University of Maryland College Park, and a master's degree in Public Administration, Health Policy and Management

from Seton Hall University. He was formally trained in emergency management through the Federal Emergency Management Agency. Mr. Mesaros has over thirty years of employment in management and administration of health systems including the MetroHealth System, QualChoice Health Plan, The Lewin Group, Holy Cross Hospital, and Providence Centralia Hospital. He has been the Site Administrator at St. Luke's Health System for over eight years. In this position he has direct oversight for all patient care and facility operations.

Mr. Mesaros is expected to testify about St. Luke's actions taken during and after the March 2022 disruptions by Defendants.

Some of Mr. Mesaros's testimony will rely on his expertise and will include testimony expressing an expert opinion, including the following:

1. St. Luke's Health System's suffered operational harm due to Defendants' conduct (the March 2022 disruptions at the Boise and Meridian Emergency Departments, the nationwide phone protest, and the ongoing threat Defendants perpetuate).
2. The health system's policies, procedures, and practices relating to emergency response and DHW interventions. These policies, procedures, and practices are reasonable and within the applicable standard of care.
3. In accordance with DHW and police guidelines and advice, the hospital system effectively and competently implemented a safety plan to allow the Infant's parents to stay informed of the Infant's treatment and progress and to visit the Infant while the Infant was receiving care at St. Luke's Boise.
4. Defendants' actions posed a threat to the caregivers and prevented emergency medical crews from transporting patients to St. Luke's Boise.

5. The hospital system was forced to take steps to limit exposure of the pediatric care team to protect their safety, including removing ID badges, pictures, and names from documentation. These steps were needed because of the threat posed by Defendants.

G. RACHEL THOMAS, MD

Dr. Thomas is a physician with Emergency Medicine of Idaho, which contracts with St. Luke's. She solely works at St. Luke's emergency departments. She has extensive experience in emergency medicine, having worked in emergency medicine for the past 12 years.

Dr. Thomas on shift the St. Luke's Meridian emergency department on the night of March 11-12, 2022. She is personally familiar with the circumstances of Ammon Bundy's trespass at the St. Luke's Meridian emergency department, the ensuing disturbances by Mr. Bundy and his followers, the circumstances in which the Infant was brought to St. Luke's Meridian for medical care, the care provided to the Infant, and the Infant's transfer to St. Luke's Boise.

Dr. Thomas is expected to testify about the disruption Mr. Bundy caused, that it was serious and threatening, and that St. Luke's Meridian emergency department responded to and mitigated the disruption. One way in which St. Luke's Meridian responded to Mr. Bundy's conduct was to put the emergency department on divert status. Dr. Thomas will testify that children are not admitted to St. Luke's Meridian and can only be admitted to the children's hospital in Boise.

Some of Dr. Thomas's testimony will rely on her expertise and will include testimony expressing an expert opinion, including the following:

1. The medical condition of the Infant upon arrival at St. Luke's Meridian emergency department on the night of March 11-12, 2022. She will testify regarding her opinion that the Infant needed the medical evaluation and treatment that the Infant received at St. Luke's and that the Infant was severely malnourished.
2. St. Luke's Health System's practices and procedures regarding admission, diagnoses, and treatment, and the hospital's reporting requirements. She will testify that, as it relates to the care she provided, she properly followed all relevant practices, procedures, and reporting categories relating to the Infant. She will also testify that, while the Infant exited the emergency department through a different exit (not the exit to the ambulance bay), this irregularity was necessitated by Mr. Bundy's followers blocking the ambulance bay.
3. The Infant needed medical intervention because of the Infant's severe condition at the time of admittance. Dr. Thomas will testify regarding her opinion that her evaluation of the Infant upon arrival at the emergency department and the Infant's medical records indicated there was a serious risk to the Infant.
4. The Infant was medically stable for transport from St. Luke's Meridian to St. Luke's Boise. This means that the Infant was not likely to have a cardiac event or other catastrophic health incident while being transported from Meridian to Boise.
5. The circumstances that Mr. Bundy created—the mob of his followers blocking the ambulance bay—caused Dr. Thomas to place the emergency department on divert status, meaning that no ambulances would be routed to the St. Luke's Meridian emergency department. This decision was reasonable and prudent because there

was a real threat posed by Mr. Bundy and his followers. In addition to blocking the ambulance bay, the Bundy mob were shouting that they would take the Infant back and that those in the emergency department were kidnappers and child traffickers.

6. The care provided to the Infant at St. Luke's Meridian emergency department was competent and in the best interests of the Infant and met the applicable standard of care.
7. Dr. Thomas will testify regarding the medical records that she generated or referred to relating to the medical care provided to the Infant. She may also refer to and testify regarding other medical records relating the Infant's care and condition.

H. JAMIE PRICE, MD

Dr. Price is a pediatric hospitalist at St. Luke's Regional Medical Center and serves as the current elected Chair of the Department of Pediatrics for St. Luke's. She has 12 years' experience as a pediatric hospitalist and 15 years' experience in pediatric care. Dr. Price has extensive experience in caring for children admitted to the hospital for neglect and abuse and in caring for children who are experiencing failure to thrive. In the course of her job responsibilities, Dr. Price has become, and remains, familiar with the health system's practices, policies, and procedures regarding admission, treatment, and overall care of infants, children, and adolescents.

Dr. Price has a bachelor's degree in Microbiology with Honors in the Liberal Arts from The Ohio State University and a medical degree from the University of Toledo College of Medicine. She completed a pediatric residency at Wake Forest University. Dr. Price is actively

involved in pediatric education, having received the Pediatric Teaching Excellence award in 2018-2019. She is Board Certified in Pediatrics and Pediatric Hospitalist Medicine by the American Board of Pediatrics.

In addition to testifying about the care Dr. Price provided to the Infant, Dr. Price is expected to present evidence on the subject matter of the Infant's condition, care, and treatment received during the Infant's admission to St. Luke's Boise from March 12-15, 2022, the communications between St. Luke's and the Infant's parents, the effect the protests had on the hospital system's staff and patients, and the falsity of Defendants' statements concerning the care provided the Infant and the Infant's medical condition. She is also expected to testify that the Infant was not vaccinated by St. Luke's at any time.

Some of Dr. Price's testimony will rely on her expertise, including the following:

1. The medical condition and treatment provided to the Infant in March 2022. She will testify regarding her opinion that the Infant needed the medical evaluation and treatment that the Infant received at St. Luke's.
2. St. Luke's Health System's practices and procedures regarding admission, diagnoses, and treatment, and the hospital's reporting requirements. She will testify that, as it relates to the care she provided, she properly followed all relevant practices, procedures, and reporting categories relating to the Infant.
3. The diagnoses, treatment plan, and care provided to the Infant was competent and in the best interests of the Infant. The Infant suffered from severe malnutrition and dehydration which, if left untreated, could have had serious health and development consequences. The Infant's condition had deteriorated between the Infant's discharge from St. Luke's on March 4, 2022 and the Infant's admission

on March 12, 2022. The Infant needed medical intervention because of the Infant's severe condition at the time of admittance.

4. The Infant's treatment was hampered by the Infant's parents' refusal to provide basic medical history about the Infant and failure to properly characterize prior medical care received by the Infant.
5. Dr. Price will testify regarding the medical records that she generated or referred to relating to the medical care provided to the Infant. Dr. Price may also refer to and testify regarding other medical records relating to the Infant's care and condition.
6. Dr. Price will testify that all aspects of the care (including examination, evaluation, diagnosis, and treatment) that she provided to the Infant met the applicable standard of care.
7. Dr. Price will testify that the examination, imaging, and testing of the Infant that occurred at St. Luke's was appropriate and met the standard of care.

III. RESERVATION OF RIGHT TO SUPPLEMENT EXPERT DISCLOSURES

Discovery in this matter is ongoing and the Plaintiffs' reserve the right to supplement these expert disclosures and opinions as new information becomes available. The Plaintiffs' reserve the right to call any other expert witness identified by any other party, as well as the right to supplement, amend, and modify the foregoing based upon additional evidence and information developed as discovery progresses, consistent with Court's scheduling Orders and the Idaho Rules of Civil Procedure.

IV. RESERVATION OF RIGHT TO CALL REBUTTAL EXPERTS

The Plaintiffs reserve the right to call rebuttal expert witnesses at trial, and to call any experts identified or disclosed by Defendants. To the extent that Defendants may disclose expert witnesses, including rebuttal expert witnesses, the Plaintiffs expressly reserve the right to amend, supplement, or change its expert disclosures and to disclose rebuttal expert witnesses, if necessary, to rebut testimony by experts disclosed by Defendants and/or called by Defendants at trial. Upon receipt of Defendants' complete expert disclosures, the Plaintiffs will determine which experts will be called to provide rebuttal testimony.

V. CONFIDENTIAL INFORMATION AND CONTACT INFORMATION

Portions of this disclosure and some of the expert reports attached as Exhibits contain confidential health information of the Infant. Footers have been applied in the affected documents, reading "CONTAINS CONFIDENTIAL HEALTH INFORMATION." Documents with such footer should be protected and treated as confidential.

Contact information of the expert witnesses has been redacted for their personal safety. Moreover, any communication intended for the expert witnesses must be directed through Plaintiffs' counsel.

DATED: May 26, 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 26th 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
- 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 by Process Server
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

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

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

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21532997_v1

EXHIBIT G



Broker Price Opinion

4615 Harvest Ln. Emmett, ID 83617

Effective Date: December 5, 2022

Today's Date: May 25, 2023

Prepared by: Tyler Johnson and Jason Galloway

3597 East Monarch Sky Lane, Suite F-240 Meridian, ID 83646

ph | 208.866.3579 web | www.landadvisors.com

May 25, 2023

Anne Henderson
Associate, Holland & Hart LLP
800 W Main St. #1750
Boise, ID 83702

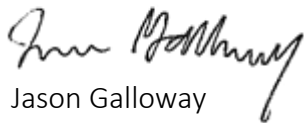
Re: Broker Price Opinion – 4615 Harvest Ln. Emmett, ID 83617

Dear Ms. Henderson,

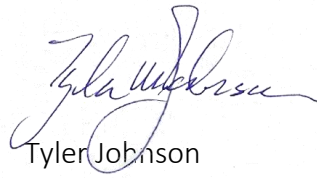
Thank you for reaching out to us for this Broker Price Opinion (BPO). We have conducted an analysis of the property at the address stated above and based on the information presented in this report, and coupled with our knowledge of the local market, **we believe that if the subject property had been exposed to the open market in late 2022, it would have likely sold for a price in the range of \$1,000,000 to \$1,100,000.**

If you have any questions, please feel free to contact us at any time.

Best Regards,



Jason Galloway
Designate Broker
Land Advisors Organization – Idaho
208.366-8700
jgalloway@landadvisors.com



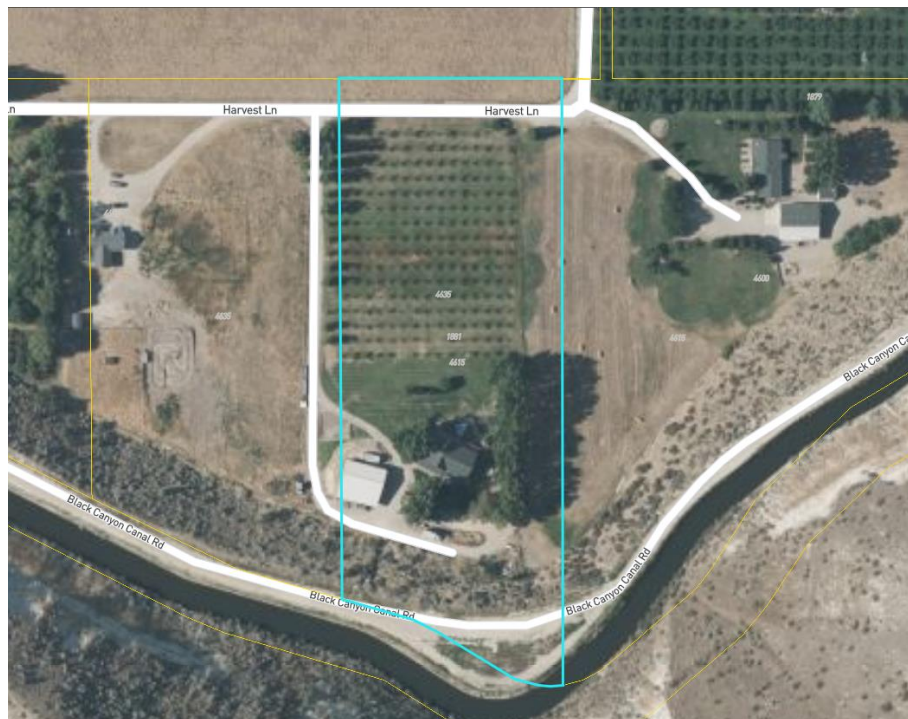
Tyler Johnson
Managing Director
Land Advisors Organization – Idaho
208.866.3579
tjohnson@landadvisors.com

It is our understanding that this BPO is for the purpose of determining a likely price range that the subject property would have sold if it had been properly exposed to the open market on or around December 5, 2022. Please be advised that the broker rendering this opinion is not licensed under the Idaho Real Estate Appraisers Act, chapter 41, title 54, Idaho Code. This BPO is not intended to meet the uniform standards of professional appraisal practice. Furthermore, This BPO is not intended to be an appraisal of the market value of the property. If an appraisal is desired, the services of a licensed or certified appraiser should be obtained. This BPO may not be used as an appraisal, or in lieu of an appraisal, in a federally related transaction. (Idaho Code 54-4105(3).) All of the market and transaction data in this report was pulled from the Intermountain Multiple Listing Service. The broker providing this opinion has no financial interest or relationship with the current owners or past owners of the subject property.

PROPERTY OVERVIEW:

PROPERTY ADDRESS:	4615 Harvest Ln. Emmett, ID 83617-3601
ACRES:	5.007 +/-
PARCEL NUMBER:	RP06N02W255405
APPROXIMATE SIZE:	Total Square Feet – 5,102; Total Finished Square Feet 4,760.
YEAR BUILT:	2005
BEDROOMS:	3
BATHROOMS:	5
ACCESS:	Based on the image below, it appears the driveway for the subject property is on the neighboring parcel. We did not investigate if there is an easement for this driveway.

This information is based on Gem County Assessor's records.



LIMITING CONDITIONS:

We do not know the condition of the residence or the condition of any of the other improvements on the property as we did not have permission to enter onto the property. We searched the Intermountain Multiple Listing Service (MLS) and other real-estate related websites in an effort to find pictures of the interior of the residence but we were unable to find any.



COMPARABLE TRANSACTIONS

We searched for comparable sales on the MLS using the following criteria: All sold homes in Emmett, on 4 to 7 acres, home sizes in the range of 3,500 to 6,000 square feet, home age range of 11 to 20 years, minimum 2 bedrooms and 3 bathrooms, that sold between the dates of January 1, 2020 and December 5, 2022. Six sales matched this criteria, two of which are the same property that sold twice within a four month period. A summary of each of these transactions can be found on Exhibit A of this report. A table summary of these transactions is as follows:

Sale #	MLS #	Parcel #	Address	# Beds	# Baths	Apx SqFt	DOM	# Acres	Year Built	Sold Price	Sold Price	Closing Date
1	98761965	RPC86810010010	3800 Shiloh	3	3	4820	55	5	2004	\$724,900	\$150.39	6/30/2020
2	98767032	RP07N01W347670	3815 Fuller Road	4	6	3506	2	6.8	2006	\$749,900	\$213.89	6/30/2020
3	98784113	RP06N02W263949A	2571 W South Slope Rd	4	3	4130	6	6	2006	\$900,000	\$217.92	11/19/2020
4	98792657	RP06N02W263949A	2571 W South Slope Rd	4	3	4130	17	6	2006	\$1,000,000	\$242.13	3/12/2021
5	98766709	RP00275004A	4452 Old Freezeout Road	5	5	5322	16	4.94	2006	\$1,000,000	\$187.90	5/13/2020
6	98840560	RP07N01W353625	3830 Frisbee Lane	5	4	5420	71	5.6	2004	\$1,500,000	\$276.75	8/26/2022

Sale #1 appears to be a fairly comparable property (similar acreage, house size, was build one year prior to the subject property, has an out-building of a meaningful size. This transaction occurred in June 2020 during the tail-end of the national covid-lockdowns. The local real estate market seemingly froze during this time but it then segued into a market that experienced rapid appreciation. To account for the appreciation in the market, the Intermountain MLS in their 2nd quarter 2020 statistical report shows that the median home price for an existing home in Gem County was \$308,900. In 4th quarter 2022 the median home price for an existing home in Gem County was \$383,750. These figures therefore suggest an appreciation of approximately 24.2% during this timeframe. Applying this appreciation to this comparable sale suggests a time-adjusted sales price of \$899,433. Copies of the applicable Gem County MLS statistical reports for this sale, as well as the other sales identified in this report, can be found on Exhibit B.

Sale #2 is a slightly smaller home yet it has one additional bedroom and one additional bathroom. It is on a slightly larger piece of land and is one year newer than the subject property. Overall, the inferior factors are likely offset by the superior factors. This transaction also occurred in June (2nd quarter) 2020. Like Sale #1, a price appreciation factor of 24.2% suggests that a time-adjusted sales price for this property would be around \$931,609.

Sale #3 is likely the best comparable sale in that it is located in the same general area as the subject property, is only a year newer, is only slightly smaller in terms of house size but is also slightly larger in terms of parcel size, and according to the MLS posting, is a working orchard something that it appears to have in common with the subject property, judging from the areal photos shown on the previous pages. This transaction closed in November (4th quarter) 2020 for \$900,000 in a cash transaction and then sold again (**Sale #4**) in March (1st quarter) 2021 for \$1,000,000 in a private sale. For the purposes of this report, and based on MLS statistical data, the appropriate appreciation factor to apply to the November 2020 sale is approximately 20.3%. This suggests that a time-adjusted price for this property would be around \$1,082,680. Due to the 'private' nature of Sale #4 we are not factoring it into this opinion of value.

Sale #5 is a roughly 562 square feet larger than the subject property. It has two additional bedrooms and one less bathroom and sits on a comparable sized lot. Based on the exterior pictures, it appears this property may be superior to the subject property. This sale occurred in May (2nd quarter) 2020. Comparing 2nd quarter 2020 median home sale price to 4th quarter 2022 median home sales price suggests a slight decrease in value of less than 1%.

For the purposes of this report, we are therefore not applying any adjustment to the sales price of this home (\$1,000,000).

Sale #6 appears to be for a higher-end, luxury home. Given that we have not been able to determine the quality of the construction of the subject house, based on what we can see from the exterior photos, the house in this sale is likely superior to the subject house. The time frame for this transaction is relatively close to the subject timeframe so we are not making any time adjustments to the price but are applying a 12.5% reduction to account for the perceived superior quality of home in this sale. This therefore suggests an adjusted sales price of \$1,312,500.



METHODOLOGY

This BPO is entirely based on comparable sales. A summary of the adjusted sales prices for the comparable properties are as follows;

Sale #1	\$899,433
Sale #2	\$931,609
Sale #3	\$1,082,680
Sale #4	Private Sale
Sale #5	\$1,000,000
Sale #6	\$1,312,500
Average	\$1,045,244

PRICE OPINION

Based on the information presented in this report, we believe that if the subject property were to have been exposed to the open market in late 2022, it likely would have achieved a sales price somewhere in the range of \$1,000,000 to \$1,100,000.

BIOGRAPHIES

Jason Galloway **Designated Broker, Idaho**

Jason Galloway is active in investing and managing multiple businesses and real estate projects.

Over the last 20 years, Jason has owned and operated a number of companies. In 2005, he raised a \$100 million real estate fund focused on lending on commercial properties. In 2009, he acquired a commercial construction company. In 2012, he acquired, built and exited a hardware and software technology provider based in Idaho and Washington. In 2013, he started an online lending company that is operating in four states. In 2020, he acquired an outdoor recreation manufacturing company. Jason is passionate about real estate, business and building teams.

Jason earned a BS in accounting from Brigham Young University in 1997 and an MBA from the Wharton School at the University of Pennsylvania in 2003. He is an inactive CPA, pilot and licensed real estate broker.

Tyler Johnson **Managing Director, Idaho**

Tyler studied construction management at Utah Valley University and graduated with a Bachelor of Business Administration in Finance from Boise State University. Tyler earned a Master of Real Estate Development (MRED) from the W. P. Carey School of Business at Arizona State University.

Tyler is the Managing Director of the Idaho office of Land Advisors Organization, the largest land brokerage company in the county. He has more than 21 years of real estate experience in Idaho and Utah.

Tyler obtained his Idaho real estate license in 2010 and opened the Idaho Land Advisors office in 2013. Tyler has handled some of the largest and most high-profile land transactions in the state. He focuses on advising landowners, investors, developers, builders, financial institutions, and public entities.

His direct involvement in the real estate industry began in 2001, when he was a foreman for an excavation team building roads and hydrological infrastructure for Utah subdivisions of more than 1,000 homes. Tyler worked as a project manager at Windsor Development, where he managed the development of a 1,500-unit residential planned community.

Prior to joining the Land Advisors Organization, Tyler served as a financial analyst and strategic advisor for one of the premier residential development companies in the greater Boise area. In this role, Tyler crafted detailed due diligence reports complete with pro forma projections for multiple residential communities ranging from 140 to more than 6,700 residential units.

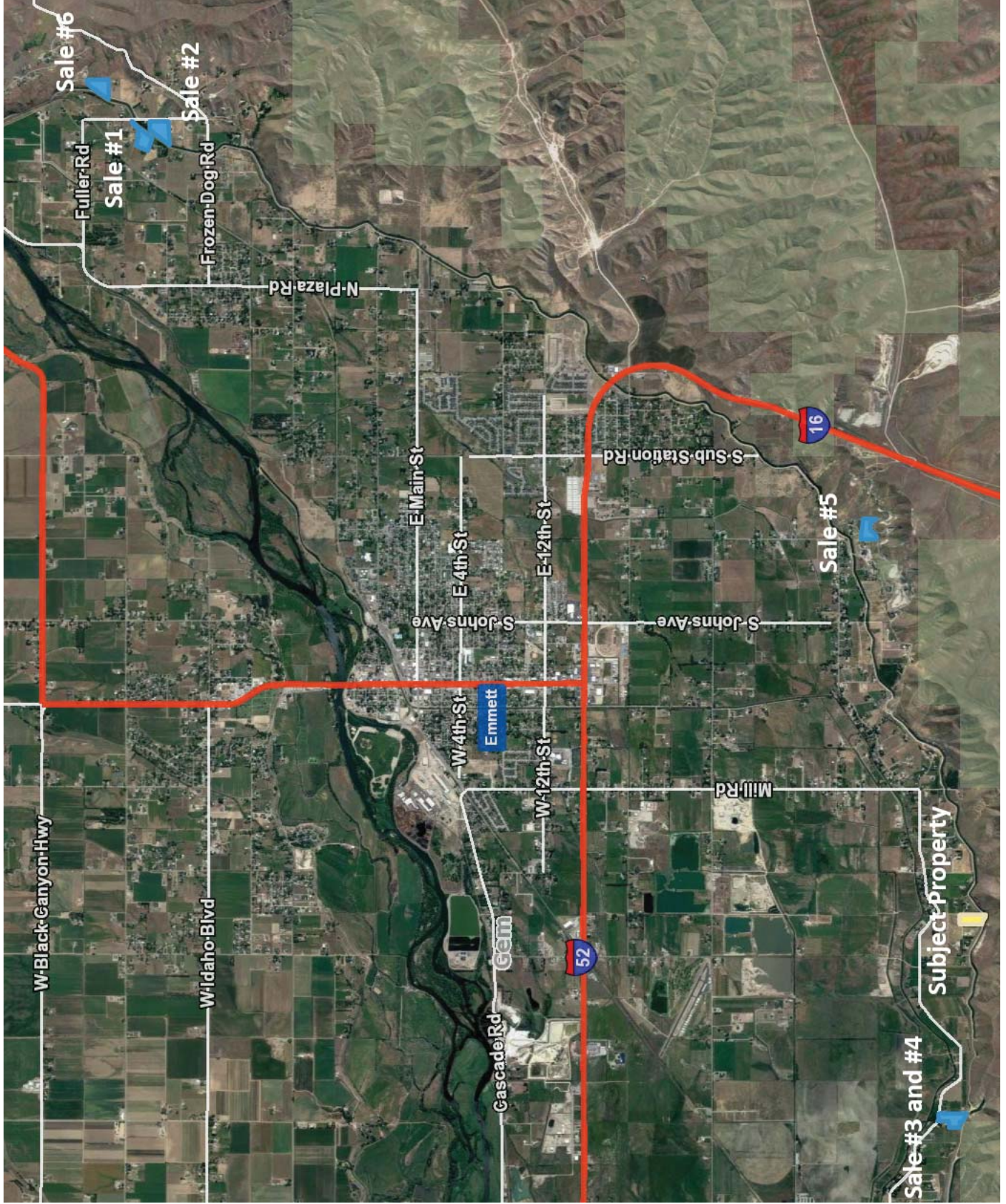
Tyler is a member of the Urban Land Institute (ULI) and the Idaho Association of Realtors.

EXHIBIT A

Comparable Sales

[see following pages]

Comparable Transactions Map



Legend

- ◇ Interchanges
- Highways
 - Interstate
 - Loop
 - Pkwy
 - State Hwy
 - US Hwy
- Arterials
- GOVERNMENTLANDS
 - Indian Reservation
 - Forest
 - BLM
 - Parks & Preserves
 - Open Space
 - State Game and Fish
 - State Trust
 - Federal
 - Military
 - National Park Service, National Bureau of Reclamation
 - Local Govt.
- County Boundaries

Tyler Johnson

Land Advisors Organization
3597 East Monarch Sky Lane
Suite F240
Meridian, Idaho 83646
Phone: 208.366.8700
Fax: 208.366.8710

This map is a user generated static output from an internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

0 0.57 Miles



MLS # **98761965**
 Class **Residential**
 Type **Single Family w/ Acreage**
 Area **Emmett-Gem County - 1550**
 Address **3800 Shiloh**
 City **Emmett**
 Zip **83617**

Asking Price **\$724,900**
 Status **Sold**
 # Beds **3**
 # Baths **3.0**
 Level **Singlew/BG**
 Garage **4**
 Apx SqFt **4820**

Sale #1

For Sale

REMARKS

Map **M** **Docs** **D**

The Equestrian Dream! This incredible property is the valley's premier horse property. Everything is turn-key and ready to go. From the spacious home that boasts spectacular views! The 48x48 custom shop will compliment a business with an office/apartment. The fully functional corals and pastures are ready for your horses or any 4-H animals you have. Horse facilities thoughtfully planned and built for the discriminating horse owner. You must see this to appreciate all it has! No HOA or CC&R's!



GENERAL

Listing Date	3/26/2020	Prc/SqFt	\$150.39			Level	Size
DOM	55	# Beds - Main	3	Apx Above Grade Fin	2260	Living	Main
Year Built	2004	# Beds - Upper	0	Apx Above Grade Unfin	0	Dining	
Age	11 - 20 Years	# Beds - Below	0	Apx Below Grade Fin	2260	Family	Down
Lot Size	irr X irr	# Baths - Main	2.5	Apx BelowGrade Unfin	0	Great Rm	
# Acres	5.000	# Baths - Upper	0.0	Apx Fin SQFT	4520	Kitchen	
Land Size	5 - 9.9 Acres	# Baths - Below	0.5	Apx Unfin SQFT	0	Master	Main
School District	Emmett Independent District #221	Flood Ins Req?	No	Home Owner Exempt?	Yes	Bed 2	Main
Grade School	Carberry	Water Deliv?	Yes	Water Shares Avail?	Yes	Bed 3	Main
Jr High	Emmett	Irrigation Dist?	Yes	Improvment. District?	No	Bed 4	
Sr High	Emmett	Irrig Dist Name	Black Canyon			Bed 5	
County	Gem	Zoning				Bonus	Down
Subdivision	0 Not Applicable					Entry	Main
Builder						Den	
Est. Comp Date						Eating	Main
Virtual Tour						Rec Rm	Down
Includes	Kitchen Range, Window Coverings & Wheel Lines					Office	Down
Excludes	Refrig & Freezer Downstairs, Appliances in shop office & car lift in shop & all personal property					Other	
Directions						Utility	
Legal	07N 01W SEC 34 PHILLIPS SUB MINOR LOT 01 BLK 01					Garage	
						Shop	48x48

FEATURES

AIR COND	Central Air	LAND USE	Single	ROOF	
FIREPLACE	One, Insert, Propane	SPRINKLERS		SEWER	
GARAGE TYPE	Detached, RV	WATER	Shared Well	SQFT SRC	Building Plans
HEATING	Forced Air, Propane, Ductless	POOL/SPA		WATER HTR	Electric
CONSTRUCTION	Concrete, Frame				
DOCS ON FILE	Property Disclosure				
KITCHEN FEAT	Breakfast Bar, Dishwasher, Disposal, Oven/Range Freestanding, Pantry, Refrigerator, Granit/Tile/Quartz Count				
LOT FEAT	Barn, Corral, Dog Run, Fenced Part, Horses, Irrigation Available, R.V. Parking, Shop, View, Shop with Electricity, Sep. Detached				
STRUCTURE FEAT	Bath-Master, Bed-Master Main Level, Central Vacuum & Equip, Covered Patio/Deck, Guest Room, Split Bedroom, Den/Office, Family				
TERMS	Cash, Conventional				

FINANCIALS

Financing Remarks			
Assoc Setup/Trnsfr	0		
Association Fees\$	\$0.00	Not Applicable	REO/Bank Owned? No
Tax Year	2019	Taxes \$3,400.00	In Foreclosure? No
Parcel #	RPC86810010010		Short Sale? No

SOLD INFORMATION

Closing Date	6/30/2020	Co-Op Broker Compensation
Sold Price	\$724,900	3.00 %
Sold Prc/SQFT	\$150.39	

Printed/Emailed By:

Tyler M Johnson

05/25/2023

This information is not guaranteed. Equal Housing Opportunity. Copyright 2010-2023 Intermountain MLS. All Rights



MLS # **98767032**
 Class **Residential**
 Type **Single Family w/ Acreage**
 Area **Emmett-Gem County - 1550**
 Address **3815 Fuller Road**
 City **Emmett**
 Zip **83617**

Asking Price **\$749,900**
 Status **Sold**
 # Beds **4**
 # Baths **6.0**
 Level **2 Story**
 Garage **8**
 Apx SqFt **3506**

For Sale

REMARKS [Map](#) [M](#) [Docs](#) [D](#)

Views, Views, Views!! Must see property with gorgeous custom home, pastures, livestock sheds. 4 car attached garage and 4 car heated/insulated detached garage. Separate guest room w/bath. Security system. Full auto sprinkler system for pasture irrigation. Auto watering livestock stations. Fully fenced pastures. Beautiful gourmet kitchen w/granite. Professional cook stove. Central vacuum. Huge rec room, split bedrooms. Master on main level. Mature trees and landscape. Fruit trees. This property has it all!!



GENERAL

Listing Date	5/15/2020	Prc/SqFt	\$213.89			Level	Size
DOM	2	# Beds - Main	3	Apx Above Grade Fin	3506	Living	
Year Built	2006	# Beds - Upper	1	Apx Above Grade Unfin	0	Dining	
Age	11 - 20 Years	# Beds - Below	0	Apx Below Grade Fin	0	Family	
Lot Size	irr X irr	# Baths - Main	5.0	Apx BelowGrade Unfin	0	Great Rm	
# Acres	6.800	# Baths - Upper	1.0	Apx Fin SQFT	3506	Kitchen	
Land Size	5 - 9.9 Acres	# Baths - Below	0.0	Apx Unfin SQFT	0	Master	Main
School District	Emmett Independent District #221	Flood Ins Req?	No	Home Owner Exempt?	Yes	Bed 2	Upper
Grade School	Carberry	Water Deliv?	Yes	Water Shares Avail?	Yes	Bed 3	Main
Jr High	Emmett	Irrigation Dist?	Yes	Improvment. District?	No	Bed 4	Main
Sr High	Emmett	Irrig Dist Name	Black Canyon			Bed 5	
County	Gem	Zoning				Bonus	
Subdivision	0 Not Applicable					Entry	
Builder						Den	
Est. Comp Date						Eating	
Virtual Tour	Unbranded Virtual Tour 1					Rec Rm	
Includes	Refrigerator, built in oven/range, dishwasher, microwave, disposal.					Office	
Excludes	Seller personal property, fuel tank, storage shed, refrigerators and freezer in garages.					Other	
Directions						Utility	
Legal	07N 01W SEC 34 TAX4542					Garage	
						Shop	

FEATURES

AIR COND	Central Air	LAND USE	Single	ROOF	Composition Shingle
FIREPLACE	Insert, Propane	SPRINKLERS	Auto, Full, Irrigation	SEWER	Septic
GARAGE TYPE	Attached, Detached, Carport	WATER	Individual Well	SQFT SRC	Public Records
HEATING	Electric, Forced Air, Heat	POOL/SPA		WATER HTR	Electric
CONSTRUCTION	Stucco				
DOCS ON FILE	Survey/Plat, Property Disclosure				
KITCHEN FEAT	Breakfast Bar, Dishwasher, Disposal, Double Oven, Microwave, Oven/Range Built-In, Pantry, Refrigerator, Water Softener Own,				
LOT FEAT	Horses, Irrigation Available, R.V. Parking, View, Public Road				
STRUCTURE FEAT	Alarm, Bath-Master, Bed-Master Main Level, Cable/Satellite TV, Central Vacuum & Equip, Covered Patio/Deck, Guest Room,				
TERMS	Cash, Conventional				

FINANCIALS

Financing Remarks			
Assoc Setup/Trnsfr	0		
Association Fees\$	\$0.00	Not Applicable	REO/Bank Owned? No
Tax Year	2020	Taxes \$3,649.60	In Foreclosure? No
Parcel #	RP07N01W347670		Short Sale? No

SOLD INFORMATION

Closing Date	6/30/2020	Co-Op Broker Compensation
Sold Price	\$749,900	3.00 %
Sold Prc/SQFT	\$213.89	

Printed/Emailed By:

Tyler M Johnson 05/25/2023



MLS # **98784113**
 Class **Residential**
 Type **Single Family w/ Acreage**
 Area **Emmett-Gem County - 1550**
 Address **2571 W South Slope Rd**
 City **Emmett**
 Zip **83617-9799**

Asking Price **\$899,900**
 Status **Sold**
 # Beds **4**
 # Baths **3.0**
 Level **2 Sty w/BG**
 Garage **5**
 Apx SqFt **4130**
For Sale

REMARKS [Map](#) [M](#) [Docs](#) [D](#)

VIEWES ! Picturesque custom home on 6 acres on Emmett's South Slope. Stunning landscape. A rare opportunity to own an established premier cherry orchard w/VIEWS, & the current owner/horticulturist will maintain the orchard (10 yr+). Quality features: granite, tile, soaring floor-to-ceiling rock fireplaces. Huge Rec Rm & Fam Rm leading to outdoor patio & hot tub under private gazebo. Two full kitchens. Possible separate living qtrrs, B & B, etc. See tour link & list of upgrades: HVAC, flooring, Butler pntry..



GENERAL

Listing Date	10/15/2020	Prc/SqFt	\$217.89			Level	Size	
DOM	6	# Beds - Main	3	Apx Above Grade Fin	2353	Living		
Year Built	2006	# Beds - Upper	0	Apx Above Grade Unfin	0	Dining		
Age	11 - 20 Years	# Beds - Below	1	Apx Below Grade Fin	1777	Family	Down 21x17	
Lot Size	irreg X irreg	# Baths - Main	2.0	Apx BelowGrade Unfin	0	Great Rm		
# Acres	6.000	# Baths - Upper	0.0	Apx Fin SQFT	4130	Kitchen	Main 10x12	
Land Size	5 - 9.9 Acres	# Baths - Below	1.0	Apx Unfin SQFT	0	Master	Main 17x15	
School District	Emmett Independent District #221	Flood Ins Req?	No	Home Owner Exempt?	Yes	Bed 2	Main 12x14	
Grade School	Shadow Butte	Water Deliv?	Yes	Water Shares Avail?	Yes	Bed 3	Main 12x9	
Jr High	Emmett	Irrigation Dist?	Yes	Improvment. District?	No	Bed 4	Down 14z12	
Sr High	Emmett	Irrig Dist Name	Emmett Irrigation			Bed 5		
County	Gem	Zoning				Bonus	Upper 25x20	
Subdivision	0 Not Applicable					Entry	Main 4x6	
Builder						Den		
Est. Comp Date						Eating	Main 10x13	
Virtual Tour	Unbranded Virtual Tour 1					Rec Rm	Down 22x24	
Includes	2 SS refrigerators, 2 stoves, 2 microwaves, hot tub, desk, pool table, irrigation equipment						Office	
Excludes	Seller's personal property.						Other	
Directions						Utility	Down 12x11	
Legal	06N 02W SEC 26,27 TAX6072 See Exhibit A						Garage	32x40
						Shop		

FEATURES

AIR COND	Central Air	LAND USE	Single	ROOF	Composition Shingle
FIREPLACE	Two, Gas, Wood Stove	SPRINKLERS	Auto, Pressurized Irrigation	SEWER	Septic
GARAGE TYPE	Attached	WATER	Individual Well	SQFT SRC	Building Plans
HEATING	Electric, Forced Air, Heat	POOL/SPA	Hot Tub/Spa	WATER HTR	Electric
CONSTRUCTION	Frame, Log				
DOCS ON FILE	Lease, Property Disclosure, Lengthy Legal Description				
KITCHEN FEAT	Breakfast Bar, Dishwasher, Disposal, Oven/Range Freestanding, Refrigerator, Granit/Tile/Quartz Count				
LOT FEAT	Garden Space, Horses, Irrigation Available, R.V. Parking, View, Rolling Topography				
STRUCTURE FEAT	Bath-Master, Bed-Master Main Level, Cable/Satellite TV, Covered Patio/Deck, Split Bedroom, Family Room, Broadband Internet,				
TERMS	Cash, Conventional, Fed. Housing Admin., Veterans Admin				

FINANCIALS **SOLD INFORMATION**

Financing Remarks		Closing Date	11/19/2020	Co-Op Broker Compensation
Assoc Setup/Trnsfr	0	Sold Price	\$900,000	3.00 %
Association Fees\$	\$0.00 Not Applicable	REO/Bank Owned?	No	Sold Prc/SQFT
Tax Year	2020	Taxes	\$2,801.00	\$217.92
Parcel #	RP06N02W263949A	In Foreclosure?	No	
		Short Sale?	No	

Printed/Emailed By:

Tyler M Johnson 05/25/2023



MLS # **98792657**
 Class **Residential**
 Type **Single Family w/ Acreage**
 Area **Emmett-Gem County - 1550**
 Address **2571 W South Slope Rd**
 City **Emmett**
 Zip **83617-9799**

Asking Price **\$1,050,000**
 Status **Sold**
 # Beds **4**
 # Baths **3.0**
 Level **2 Sty w/BG**
 Garage **5**
 Apx SqFt **4130**
For Sale

REMARKS [Map](#) [M](#) [Docs](#) [D](#)

VIEWS ! Picturesque custom home on 6 acres on coveted South Slope Rd. Stunning landscape. A rare opportunity to own an established premier cherry orchard w/VIEWS. Previous owner/horticulturist will maintain the orchard. Quality features: granite, tile, soaring floor-to-ceiling rock fireplaces. Huge Rec Rm & Fam Rm leading to outdoor patio & hot tub under private gazebo. Two full kitchens. Possible separate living qtrs, B & B, etc. See tour link & list of upgrades: HVAC, flooring, etc.



GENERAL

Listing Date	2/4/2021	Prc/SqFt	\$254.24			Level	Size
DOM	17	# Beds - Main	3	Apx Above Grade Fin	2353	Living	
Year Built	2006	# Beds - Upper	0	Apx Above Grade Unfin	0	Dining	
Age	11 - 20 Years	# Beds - Below	1	Apx Below Grade Fin	1777	Family	Down 21x17
Lot Size	irreg X irreg	# Baths - Main	2.0	Apx BelowGrade Unfin	0	Great Rm	
# Acres	6.000	# Baths - Upper	0.0	Apx Fin SQFT	4130	Kitchen	Main 10x12
Land Size	5 - 9.9 Acres	# Baths - Below	1.0	Apx Unfin SQFT	0	Master	Main 17x15
School District	Emmett Independent District #221	Flood Ins Req?	No	Home Owner Exempt?	Yes	Bed 2	Main 12x14
Grade School	Shadow Butte	Water Deliv?	Yes	Water Shares Avail?	Yes	Bed 3	Main 12x9
Jr High	Emmett	Irrigation Dist?	Yes	Improvment. District?	No	Bed 4	Down
Sr High	Emmett	Irrig Dist Name	Emmett Irrigation			Bed 5	
County	Gem	Zoning				Bonus	Upper 25x20
Subdivision	0 Not Applicable					Entry	Main 4x6
Builder						Den	
Est. Comp Date						Eating	Main 10x13
Virtual Tour	Unbranded Virtual Tour 1					Rec Rm	Down 22x24
Includes	2 SS refridgerators, 2 stoves, 2 microwaves, hot tub, irrigation equipment					Office	
Excludes	Seller's personal property.					Other	
Directions						Utility	Down 12x11
Legal	06N 02W SEC 26,27 TAX6072 See Exhibit A					Garage	
						Shop	

FEATURES

AIR COND	Central Air	LAND USE	Single	ROOF	Composition Shingle
FIREPLACE	Two, Gas, Wood Stove	SPRINKLERS	Auto, Pressurized Irrigation	SEWER	Septic
GARAGE TYPE	Attached	WATER	Individual Well	SQFT SRC	Building Plans, Other
HEATING	Electric, Forced Air, Heat	POOL/SPA	Hot Tub/Spa	WATER HTR	Electric
CONSTRUCTION	Frame, Log				
DOCS ON FILE	Property Disclosure, Lengthy Legal Description				
KITCHEN FEAT	Breakfast Bar, Dishwasher, Disposal, Oven/Range Freestanding, Refrigerator, Granit/Tile/Quartz Count				
LOT FEAT	Garden Space, Horses, Irrigation Available, R.V. Parking, View, Chickens, Rolling Topography, Finished Driveway				
STRUCTURE FEAT	Bath-Master, Bed-Master Main Level, Cable/Satellite TV, Covered Patio/Deck, Split Bedroom, Family Room, Broadband Internet,				
TERMS	Cash, Conventional				

FINANCIALS

Financing Remarks			
Assoc Setup/Trnsfr	0		
Association Fees\$	\$0.00	Not Applicable	REO/Bank Owned? No
Tax Year	2020	Taxes \$2,801.00	In Foreclosure? No
Parcel #	RP06N02W263949A		Short Sale? No

SOLD INFORMATION

Closing Date	3/12/2021	Co-Op Broker Compensation
Sold Price	\$1,000,000	3.00 %
Sold Prc/SQFT	\$242.13	

Printed/Emailed By:

Tyler M Johnson

05/25/2023

Sale #5



MLS # **98766709**
 Class **Residential**
 Type **Single Family w/ Acreage**
 Area **Emmett-Gem County - 1550**
 Address **4452 Old Freezeout Road**
 City **Emmett**
 Zip **83617**

Asking Price **\$1,150,000**
 Status **Sold**
 # Beds **5**
 # Baths **5.0**
 Level **2 Story**
 Garage **5**
 Apx SqFt **5322**

For Sale

REMARKS [Map](#) [M](#) [Docs](#)

One of Emmett, Idaho's most prestigious "Million Dollar View" properties. Unobstructed panorama of the entire Emmett Valley. This Tuscan inspired custom home is rich in the finest details. From the moment you enter, it's apparent only the highest quality materials and craftsmanship were used in construction – imported stone, intricate wood elements, custom ironwork, and a floor plan found nowhere else. Master Suite has circular tile shower and private courtyard. All Bedrooms are full Suites. No CCRs or HOA.



GENERAL

Listing Date	2/1/2020	Prc/SqFt	\$216.08	Level	Size
DOM	16	# Beds - Main	2	Apx Above Grade Fin	5322
Year Built	2006	# Beds - Upper	3	Apx Above Grade Unfin	0
Age	11 - 20 Years	# Beds - Below	0	Apx Below Grade Fin	0
Lot Size	IRR X IRR	# Baths - Main	3.0	Apx BelowGrade Unfin	0
# Acres	4.940	# Baths - Upper	2.0	Apx Fin SQFT	5322
Land Size	1 - 4.99 AC	# Baths - Below	0.0	Apx Unfin SQFT	0
School District	Emmett Independent District #221	Flood Ins Req?	No	Home Owner Exempt?	Yes
Grade School	Shadow Butte	Water Deliv?	No	Water Shares Avail?	No
Jr High	Emmett	Irrigation Dist?	No	Improvment. District?	No
Sr High	Emmett	Irrig Dist Name			
County	Gem	Zoning			
Subdivision	0 Not Applicable				
Builder					
Est. Comp Date					
Virtual Tour	Unbranded Virtual Tour 1				
Includes	Refrigerator				
Excludes	Seller's Personal Property				
Directions					
Legal	06N 01W Sec20 Tax099 LESS HWY				

FEATURES

AIR COND	Central Air	LAND USE		ROOF	Tile
FIREPLACE	Gas, Pellet	SPRINKLERS	Auto, Full	SEWER	Septic
GARAGE TYPE	Attached	WATER	Individual Well	SQFT SRC	Public Records
HEATING	Heat Pump	POOL/SPA	Hot Tub/Spa	WATER HTR	Electric, Heat Pump
CONSTRUCTION	Stone				
DOCS ON FILE	Property Disclosure				
KITCHEN FEAT	Breakfast Bar, Dishwasher, Disposal, Double Oven, Microwave, Pantry, Refrigerator, Water Softener Own, Island, Granit/Tile/Quartz				
LOT FEAT	Garden Space, Irrigation Available, R.V. Parking, View, Canyon Rim, Private Road, Steep Topography				
STRUCTURE FEAT	Alarm, Cable/Satellite TV, Central Vacuum & Equip, Covered Patio/Deck, Den/Office, Family Room, Great Room, Jetted Tub, Two				
TERMS	Cash, Conventional				

FINANCIALS

Financing Remarks		REO/Bank Owned?	No
Assoc Setup/Trnsfr	0	In Foreclosure?	No
Association Fees\$	\$0.00	Short Sale?	No
Tax Year	2018		
Taxes	\$5,815.20		
Parcel #	RP00275004A		

SOLD INFORMATION

Closing Date	5/13/2020	Co-Op Broker Compensation	3.00 %
Sold Price	\$1,000,000		
Sold Prc/SQFT	\$187.90		

Printed/Emailed By:

Tyler M Johnson 05/25/2023

BPO Page 14 of 19



MLS # **98840560**
 Class **Residential**
 Type **Single Family w/ Acreage**
 Area **Emmett-Gem County - 1550**
 Address **3830 Frisbee Lane**
 City **Emmett**
 Zip **83617**

Asking Price **\$1,500,000** **Sale #6**
 Status **Sold**
 # Beds **5**
 # Baths **4.0**
 Level **2 Sty w/BG**
 Garage **3**
 Apx SqFt **5420** **For Sale**

REMARKS [Map](#) [M](#) [Docs](#) [D](#)

Nestled among rolling hills, this magnificent 5.6 acre estate will take your breath away with unparalleled views, impressive custom design, and a picturesque terraced vineyard. As you walk in the front door, you are met with exquisite Tuscan archways; handcrafted granite, wood, and stone. Charming French doors open to the beautiful and spacious great room, dining, and Chef's kitchen. All encased with large banks of windows, bathing each space in natural light and delivering spectacular views from every angle. The expansive walkout, daylight basement with its own kitchen, En Suite and driveway entrance, offers multi-generational living quarters or a fantastic theater/game room.



GENERAL

Listing Date	5/1/2022	Prc/SqFt	\$276.75	Level	Size
DOM	71	# Beds - Main	4	Apx Above Grade Fin	2720
Year Built	2004	# Beds - Upper	0	Apx Above Grade Unfin	0
Age	11 - 20 Years	# Beds - Below	1	Apx Below Grade Fin	2700
Lot Size	0 X 0	# Baths - Main	3.0	Apx BelowGrade Unfin	0
# Acres	5.600	# Baths - Upper	0.0	Apx Fin SQFT	5420
Land Size	5 - 9.9 Acres	# Baths - Below	1.0	Apx Unfin SQFT	0
School District	Emmett Independent District #221	Flood Ins Req?	No	Home Owner Exempt?	Yes
Grade School	Carberry	Water Deliv?		Water Shares Avail?	Yes
Jr High	Emmett	Irrigation Dist?	Yes	Improvment. District?	No
Sr High	Emmett	Irrig Dist Name			
County	Gem	Zoning	Rural Transitional Ag		
Subdivision	0 Not Applicable				
Builder					
Est. Comp Date					
Virtual Tour	Unbranded Virtual Tour 1				
Includes	Refrigerator, washer & dryer, central vac equipment				
Excludes					
Directions					
Legal	07N 01W SEC 35 TAX4600				

FEATURES

AIR COND	Central Air	LAND USE	Single	ROOF	Architectural Style
FIREPLACE	Two, Wood Stove	SPRINKLERS	Full, Pressurized Irrigation, Irrigation	SEWER	Not Connected, Septic
GARAGE TYPE	Attached	WATER	Individual Well	SQFT SRC	Public Records
HEATING	Heat Pump, Propane	POOL/SPA		WATER HTR	
CONSTRUCTION	Stucco				
DOCS ON FILE	Property Disclosure				
KITCHEN FEAT	Breakfast Bar, Dishwasher, Disposal, Microwave, Oven/Range Freestanding, Pantry, Refrigerator, Washer, Dryer, Island,				
LOT FEAT	Fenced Part, Garden Space, Horses, Irrigation Available, R.V. Parking, Waterfront, View, Private Road				
STRUCTURE FEAT	Bath-Master, Bed-Master Main Level, Central Vacuum & Equip, Guest Room, Hardwood, Skylight, Den/Office, Formal Dining, Family				
TERMS	Cash, Conventional				

FINANCIALS

Financing Remarks			
Assoc Setup/Trnsfr	0		
Association Fees\$	\$0.00	Not Applicable	REO/Bank Owned? No
Tax Year	2021	Taxes \$3,736.00	In Foreclosure? No
Parcel #	RP07N01W353625		Short Sale? No

SOLD INFORMATION

Closing Date	8/26/2022	Co-Op Broker Compensation
Sold Price	\$1,500,000	2.50 %
Sold Prc/SQFT	\$276.75	

Printed/Emailed By:

Tyler M Johnson 05/25/2023
BPO Page 15 of 19

EXHIBIT B

MLS Statistical Reports

[see following pages]

Gem County Single Family Home Sales Comparing Q2 2020 with Q2 2019					
	Q2 of 2020	Year to Date 20	Q2 of 2019	Year to Date 19	Previous 12 Months
Total Active Residential Listings	n/a		n/a		
Total Pending Residential Listings	n/a		n/a		
Total Single-Family Homes Sold	79	136	85	138	252
Percent Change	-7.06 %	-1.45 %			
Median Price	\$307,000	\$281,200	\$239,900	\$233,520	\$267,450
Percent Change	27.97 %	20.42 %			
Average Price	\$361,404	\$342,502	\$272,724	\$257,969	\$316,997
Percent Change	32.52 %	32.77 %			
Days on Market	29	44	32	41	41
Total Dollar Volume	\$28,550,882	\$46,580,292	\$23,181,540	\$35,599,789	\$79,883,199
Percent Change	23.16 %	30.84 %			

Gem County Existing Home Sales					
	Q2 of 2020	Year to Date 20	Q2 of 2019	Year to Date 19	Previous 12 Months
Existing Residential Listings	n/a		n/a		
Existing Pending Listings	n/a		n/a		
Existing Homes Sold	71	121	80	129	211
Percent Change	-11.25 %	-6.20 %			
Median Price	\$308,900	\$279,900	\$240,000	\$232,000	\$262,800
Percent Change	28.71 %	20.65 %			
Average Price	\$364,282	\$344,479	\$275,537	\$258,645	\$315,169
Percent Change	32.21 %	33.19 %			
Days on Market	31	40	29	40	38
Existing Dollar Volume	\$25,864,022	\$41,681,922	\$22,042,950	\$33,365,200	\$66,500,641
Percent Change	17.33 %	24.93 %			

Gem County Newly Constructed Home Sales					
	Q2 of 2020	Year to Date 20	Q2 of 2019	Year to Date 19	Previous 12 Months
Newly Constructed Residential Listings	n/a		n/a		
Newly Constructed Pending Listings	n/a		n/a		
Newly Constructed Homes Sold	8	15	5	9	41
Percent Change	60.00 %	66.67 %			
Median Price	\$277,920	\$282,889	\$218,000	\$240,570	\$277,132
Percent Change	27.49 %	17.59 %			
Average Price	\$335,858	\$326,558	\$227,718	\$248,288	\$326,404
Percent Change	47.49 %	31.52 %			
Days on Market	13	75	73	47	53
Newly Constructed Dollar Volume	\$2,686,860	\$4,898,370	\$1,138,590	\$2,234,589	\$13,382,558
Percent Change	135.98 %	119.21 %			

These statistics are based upon information secured by the agent from the owner or their representative. The accuracy of this information, while deemed reliable, has not been verified and is not guaranteed. These statistics are not intended to represent the total number of properties sold in Ada County during the specified time period. The Intermountain Regional Multiple Listing Service provides these statistics for purposes of general market analysis, but makes no representations as to the past or future appreciation or depreciation of property values. (To reduce the error, only data falling within 3 standard deviations from the mean has been included in the report. Existing and new construction statistics are calculated independently and may not sum to the total number of homes sold.) * Effective 3/1/2007, 'days on market' refers to the number of days that transpire between the listing date and the date the property goes into pending status. Effective 4/1/2011, standard deviation is modified to reflect the difference between the asking and sold prices as a percentage of the asking price.

Gem County Single Family Home Sales Comparing November 2020 with November 2019					
	Nov-20	Year to Date 20	Nov-19	Year to Date 19	Previous 12 Months
Total Active Residential Listings	26		61		
Total Pending Residential Listings	68		40		
Total Single-Family Homes Sold	25	294	18	255	299
Percent Change	38.89 %	15.29 %			
Median Price	\$330,000	\$323,950	\$262,999	\$245,000	\$315,000
Percent Change	25.48 %	32.22 %			
Average Price	\$408,297	\$364,971	\$300,960	\$283,292	\$352,454
Percent Change	35.67 %	28.83 %			
Days on Market	41	40	54	40	38
Total Dollar Volume	\$10,207,433	\$107,301,370	\$5,417,273	\$72,239,564	\$105,383,669
Percent Change	88.42 %	48.54 %			

Gem County Existing Home Sales					
	Nov-20	Year to Date 20	Nov-19	Year to Date 19	Previous 12 Months
Existing Residential Listings	16		56		
Existing Pending Listings	35		29		
Existing Homes Sold	21	266	14	224	270
Percent Change	50.00 %	18.75 %			
Median Price	\$319,000	\$324,950	\$251,500	\$239,950	\$319,450
Percent Change	26.84 %	35.42 %			
Average Price	\$413,048	\$367,065	\$292,914	\$279,517	\$354,960
Percent Change	41.01 %	31.32 %			
Days on Market	39	38	44	39	36
Existing Dollar Volume	\$8,674,000	\$97,639,411	\$4,100,800	\$62,611,819	\$95,839,111
Percent Change	111.52 %	55.94 %			

Gem County Newly Constructed Home Sales					
	Nov-20	Year to Date 20	Nov-19	Year to Date 19	Previous 12 Months
Newly Constructed Residential Listings	10		5		
Newly Constructed Pending Listings	33		11		
Newly Constructed Homes Sold	4	28	4	31	29
Percent Change	0.00 %	-9.68 %			
Median Price	\$445,466	\$312,880	\$275,238	\$261,338	\$294,200
Percent Change	61.85 %	19.72 %			
Average Price	\$383,358	\$345,070	\$329,118	\$310,572	\$329,123
Percent Change	16.48 %	11.11 %			
Days on Market	49	62	91	47	54
Newly Constructed Dollar Volume	\$1,533,433	\$9,661,959	\$1,316,473	\$9,627,745	\$9,544,558
Percent Change	16.48 %	0.36 %			

These statistics are based upon information secured by the agent from the owner or their representative. The accuracy of this information, while deemed reliable, has not been verified and is not guaranteed. These statistics are not intended to represent the total number of properties sold in Ada County during the specified time period. The Intermountain Regional Multiple Listing Service provides these statistics for purposes of general market analysis, but makes no representations as to the past or future appreciation or depreciation of property values. (To reduce the error, only data falling within 3 standard deviations from the mean has been included in the report. Existing and new construction statistics are calculated independently and may not sum to the total number of homes sold.) * Effective 3/1/2007, 'days on market' refers to the number of days that transpire between the listing date and the date the property goes into pending status. Effective 4/1/2011, standard deviation is modified to reflect the difference between the asking and sold prices as a percentage of the asking price.

Gem County Single Family Home Sales Comparing Q4 2022 with Q4 2021					
	Q4 of 2022	Year to Date 22	Q4 of 2021	Year to Date 21	Previous 12 Months
Total Active Residential Listings	n/a		n/a		
Total Pending Residential Listings	n/a		n/a		
Total Single-Family Homes Sold	75	326	97	415	305
Percent Change	-22.68%	-21.45%			
Median Price	\$412,321	\$474,950	\$435,000	\$380,000	\$487,000
Percent Change	-5.21%	24.99%			
Average Price	\$490,747	\$529,575	\$488,531	\$458,591	\$534,969
Percent Change	0.45%	15.48%			
Days on Market	63	46	36	27	43
Total Dollar Volume	\$36,806,053	\$172,641,548	\$47,387,520	\$190,315,299	\$163,165,558
Percent Change	-22.33%	-9.29%			

Gem County Existing Home Sales					
	Q4 of 2022	Year to Date 22	Q4 of 2021	Year to Date 21	Previous 12 Months
Existing Residential Listings	n/a		n/a		
Existing Pending Listings	n/a		n/a		
Existing Homes Sold	56	240	73	313	224
Percent Change	-23.29%	-23.32%			
Median Price	\$383,750	\$414,950	\$415,000	\$380,000	\$424,200
Percent Change	-7.53%	9.20%			
Average Price	\$460,984	\$507,568	\$485,952	\$465,626	\$513,184
Percent Change	-5.14%	9.01%			
Days on Market	52	38	35	26	36
Existing Dollar Volume	\$25,815,090	\$121,816,316	\$35,474,499	\$145,740,852	\$114,953,316
Percent Change	-27.23%	-16.42%			

Gem County Newly Constructed Home Sales					
	Q4 of 2022	Year to Date 22	Q4 of 2021	Year to Date 21	Previous 12 Months
Newly Constructed Residential Listings	n/a		n/a		
Newly Constructed Pending Listings	n/a		n/a		
Newly Constructed Homes Sold	19	86	24	102	81
Percent Change	-20.83%	-15.69%			
Median Price	\$499,999	\$557,400	\$472,948	\$385,214	\$566,000
Percent Change	5.72%	44.70%			
Average Price	\$578,472	\$590,991	\$496,376	\$437,004	\$595,213
Percent Change	16.54%	35.24%			
Days on Market	96	68	38	28	61
Newly Constructed Dollar Volume	\$10,990,963	\$50,825,232	\$11,913,021	\$44,574,447	\$48,212,242
Percent Change	-7.74%	14.02%			

These statistics are based upon information secured by the agent from the owner or their representative. The accuracy of this information, while deemed reliable, has not been verified and is not guaranteed. These statistics are not intended to represent the total number of properties sold in Ada County during the specified time period. The Intermountain Regional Multiple Listing Service provides these statistics for purposes of general market analysis, but makes no representations as to the past or future appreciation or depreciation of property values. (To reduce the error, only data falling within 3 standard deviations from the mean has been included in the report. Existing and new construction statistics are calculated independently and may not sum to the total number of homes sold.) * Effective 3/1/2007, 'days on market' refers to the number of days that transpire between the listing date and the date the property goes into pending status. Effective 4/1/2011, standard deviation is modified to reflect the difference between the asking and sold prices as a percentage of the asking price.

EXHIBIT H

HATEWATCH

EXTREMISTS RECEIVE LARGE ETHEREUM CRYPTOCURRENCY DONATIONS

May 10, 2023

by Megan Squire and Jason Wilson

A single benefactor made cryptocurrency donations worth more than \$216,000 to extremists and hate groups between September 2021 and April 2022, according to an analysis provided to Hatewatch by the SPLC's Data Lab.

The single biggest beneficiary was antigovernment extremist Ammon Bundy's People's Rights Network (PRN), which received transfers worth \$93,000.

Hatewatch was first alerted to the cryptocurrency donations to PRN by the Institute for Research and Education on Human Rights.

Other major beneficiaries include white nationalist publication [VDARE](#), which received \$42,000, and white nationalist organization [American Renaissance](#), which received \$35,000.

The donations continue a pattern of anonymous big-money benefactors using cryptocurrency to conceal their identities and avoid accountability for funding extremists. Hatewatch has previously reported on [similar donations](#) including over [\\$8 million](#) donated to conspiracy theorist [Alex Jones](#).

DONOR COVERS TRACKS

The mystery donor concealed the original source of the donations by using Tornado Cash, a so-called “mixer” service that disguises the origins of cryptocurrency transfers. Tornado Cash has since been [sanctioned](#) by the U.S. government due to its use in money-laundering, including by hackers sponsored by the North Korean regime.

From Tornado Cash, the donor transferred Ethereum to three cryptocurrency addresses, which were then used to funnel the digital coins to extremists.

Just over 99 Ethereum coins worth \$314,000 were sent from Tornado Cash to a cryptocurrency address of unknown ownership on Jan. 10, 2022.

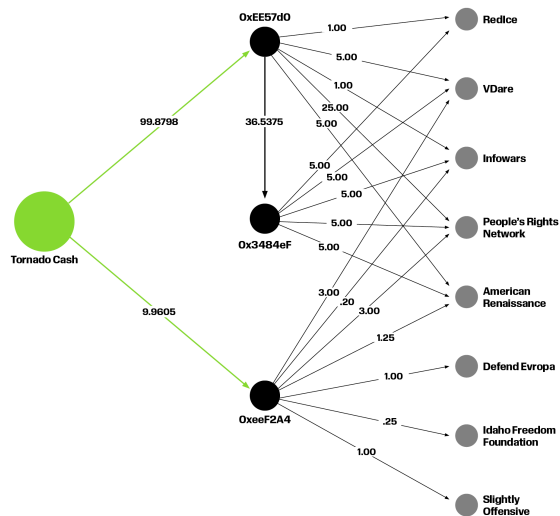
The SPLC Intelligence Project's Data Lab uses cutting-edge techniques from data science and open-source intelligence to understand how threat actors exploit the online landscape. The Lab's scope includes cryptocurrencies, "alt-tech" platforms and online organizing by extremists and hate groups.

PRN'S BIG PAYDAY

Also on Jan. 10, 2022, PRN received a 20-coin donation from that address, and a five-coin donation on Jan. 29. Together those amounts were worth over \$66,694 when they were sent.

The first account also transferred on Jan. 10, 2022:

Mystery Donor Distributed Ethereum Worth More Than \$216,000 to Extremists and Hate Groups (September 2021 – April 2022)



Source: SPLC Data Lab analysis provided to Hatewatch

- A five-coin donation to VDARE, worth \$15,754 at that time.
- A five-coin donation to white nationalist broadcaster Red Ice worth \$3,150.
- A one-coin donation to Infowars.

On April 15, 2022, the donor transferred some 36 Ethereum coins from the first address to a second one. These were worth around \$110,000 at that time.

Five days later, on April 20, 2022, this second account sent PRN a donation of five Ethereum coins, worth \$15,512 at the time.

Then, between 11:56 p.m. and midnight Greenwich Mean Time on April 20, that same account sent matching five-coin donations to VDARE, American Renaissance, Red Ice and Infowars.

April 20 is a date of complex significance on the far right and in extremist subcultures. As well as being Adolf Hitler's birthday, it marks the anniversary of the Columbine High School mass shooting, which took place in 1999.

The preceding date, April 19, marks the anniversary of both the 1995 bombing of a federal building in Oklahoma City by antigovernment extremist Timothy McVeigh, and the conclusion of the Waco, Texas, siege in 1993, one of the events McVeigh claimed to be responding to.

On Aug. 13, 2021, the donor transferred 10 Ethereum from Tornado Cash, the cryptocurrency mixer, to a third account. The coins were worth just over \$30,000 at that time.

EXTREMISTS CASH IN

[People's Rights Network](#) received Ethereum coins worth \$10,819 in three one-coin donations from the third crypto address on Aug. 13, 2021, Sept. 24, 2021, and Nov. 8, 2021.

The donor used the same address to send three one-coin donations to VDARE on the same dates.

The third address was also used by the donor to send:

- Two 0.5-coin donations, worth \$3,885 at the time, to Slightly Offensive, a far-right podcast hosted by Elijah Schaeffer. Schaeffer was [fired in October 2022](#) from Glenn Beck's media company The Blaze for allegedly groping a co-worker.
- One-coin and 0.25-coin donations to American Renaissance, worth a total of \$4,201 when they were sent in August and November 2021.
- A one-coin donation to white nationalist hate group Defend Evropa, which was worth \$3,047 when it was sent in August 2021.
- A 0.25-coin donation to the far-right Idaho Freedom Foundation, worth \$1,154 when it was sent in November 2021.
- A 0.02-coin donation to Infowars, worth just over \$920 in November 2021.

Between August 2021 and April 2022, Ammon Bundy's PRN received donations from all three accounts, as did VDARE, Infowars and American Renaissance.

Red Ice received donations from the first and second accounts, while Defend Evropa, Idaho Freedom Foundation and Slightly Offensive only received donations from the third account.

An Idaho hospital, St. Luke's Meridian Medical Center, is suing Bundy for defamation over his accusations that the hospital forcibly vaccinated the grandchild of a member of his People's Rights Network.

A lawyer for St. Luke's has [reportedly](#) described Bundy as a "grifter" and expressed interest in his sources of income.

Hatewatch contacted Bundy, [Jared Taylor](#) of American Renaissance, Red Ice, and [Peter Brimelow](#) of VDARE for comment but did not receive replies by publication time.

Photo illustration by SPLC

* * *

Comments, suggestions or tips? Send them to HWeditor@splcenter.org and follow us on [Twitter @Hatewatch](#).

Get the latest investigative reporting from Hatewatch

Your Email Address

SUBSCRIBE