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**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’ SECOND
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

PLAINTIFFS’ SECOND SUPPLEMENTAL EXPERT WITNESS DISCLOSURES

through their attorneys of record, Holland & Hart LLP, hereby submit their second supplemental disclosure of expert witnesses, which identifies the witnesses who may provide expert testimony at the trial of the above-captioned case. This second supplemental 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** and **Exhibit A-1**.

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** and **Exhibit A-1**. 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** and **Exhibit C-1**.

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** and **Exhibit C-1**. 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** and **Exhibit E-1**.

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** and **Exhibit E-1**. 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** and **Exhibit F-1**.

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** and **Exhibit F-1**. 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 31, 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 1st day of June, 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
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Emmett, ID 83617-3601

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

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

People's Rights Network
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- Hand Delivered
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PLAINTIFFS' SECOND SUPPLEMENTAL EXPERT WITNESS DISCLOSURES

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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Exhibit A-1

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2022-09-23	SLHS_0001913	freedomman.org_2022-05-23-15-36-51
2022-09-23		freedomman.org_2022-05-23-15-36-54
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2022-09-23	SLHS_0001935	freedomman.org_2022-05-23-15-39-37
2022-09-23		freedomman.org_2022-05-23-15-39-38
2022-09-23	SLHS_0001932	freedomman.org_2022-05-23-15-38-55
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2022-09-23		freedomman.org_2022-05-23-15-39-50
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2022-09-23		freedomman.org_2022-05-23-15-40-07
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2022-09-23		freedomman.org_2022-05-23-15-41-33
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2022-09-23		freedomman.org_2022-05-23-15-41-45

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2022-09-23		freedomman.org_2022-05-23-15-42-30
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2022-09-23		babycyrus.com_2022-05-23-16-00-26
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2022-09-23		babycyrus.com_2022-05-23-16-01-42
2022-09-23		www.votebundy.com_2022-05-23-16-01-44
2022-09-23		www.babycyrus.com_2022-05-23-16-01-45
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2022-09-23		babycyrus.com_2022-05-23-16-01-53
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2022-09-23		www.votebundy.com_2022-05-23-16-02-41
2022-09-23		www.babycyrus.com_2022-05-23-16-02-43

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2022-09-23		www.diegorodriguez.org_2022-05-23-16-04-32
2022-09-23		team.votebundy.com_2022-05-23-16-04-36
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2022-09-23		diegorodriguez.org_2022-05-23-16-04-37
2022-09-23		www.babycyrus.com_2022-05-23-16-04-38
2022-09-23		www.votebundy.com_2022-05-23-16-04-38
2022-09-23		www.votebundy.com_2022-05-23-16-04-40
2022-09-23		www.babycyrus.com_2022-05-23-16-04-39
2022-09-23		team.votebundy.com_2022-05-23-16-04-44

Documents		
Date Provided	Bates	Item
2022-09-23		www.babycyrus.com_2022-05-23-16-04-47
2022-09-23		www.babycyrus.com_2022-05-23-16-04-48
2022-09-23		babycyrus.com_2022-05-23-16-04-42
2022-09-23		www.babycyrus.com_2022-05-23-16-04-12
2022-09-23		www.votebundy.com_2022-05-23-16-04-53
2022-09-23		www.diegorodriguez.org_2022-05-23-16-04-58
2022-09-23		www.diegorodriguez.org_2022-05-23-16-04-51
2022-09-23		babycyrus.com_2022-05-23-16-04-58
2022-09-23		www.babycyrus.com_2022-05-23-16-04-59
2022-09-23		www.babycyrus.com_2022-05-23-16-05-01
2022-09-23		www.babycyrus.com_2022-05-23-16-05-04
2022-09-23		team.votebundy.com_2022-05-23-16-05-05
2022-09-23		team.votebundy.com_2022-05-23-16-05-11
2022-09-23		diegorodriguez.org_2022-05-23-16-05-11
2022-09-23		www.diegorodriguez.org_2022-05-23-16-05-17
2022-09-23		www.votebundy.com_2022-05-23-16-05-18
2022-09-23		www.babycyrus.com_2022-05-23-16-05-15
2022-09-23		www.votebundy.com_2022-05-23-16-05-20
2022-09-23		www.babycyrus.com_2022-05-23-16-05-20
2022-09-23		www.babycyrus.com_2022-05-23-16-05-23
2022-09-23		babycyrus.com_2022-05-23-16-05-25
2022-09-23		diegorodriguez.org_2022-05-23-16-05-30
2022-09-23		www.votebundy.com_2022-05-23-16-05-30
2022-09-23		www.babycyrus.com_2022-05-23-16-05-30
2022-09-23		www.diegorodriguez.org_2022-05-23-16-05-37
2022-09-23		www.babycyrus.com_2022-05-23-16-05-39
2022-09-23		www.babycyrus.com_2022-05-23-16-05-39
2022-09-23		team.votebundy.com_2022-05-23-16-05-40
2022-09-23		gear.votebundy.com_2022-05-23-16-05-44
2022-09-23		team.votebundy.com_2022-05-23-16-05-24
2022-09-23		www.babycyrus.com_2022-05-23-16-05-14
2022-09-23		www.babycyrus.com_2022-05-23-16-05-51
2022-09-23		babycyrus.com_2022-05-23-16-05-48
2022-09-23		diegorodriguez.org_2022-05-23-16-05-55
2022-09-23		www.diegorodriguez.org_2022-05-23-16-05-14
2022-09-23		www.babycyrus.com_2022-05-23-16-05-56
2022-09-23		diegorodriguez.org_2022-05-23-16-05-58
2022-09-23		www.votebundy.com_2022-05-23-16-05-59
2022-09-23		team.votebundy.com_2022-05-23-16-06-02
2022-09-23		www.diegorodriguez.org_2022-05-23-16-06-04
2022-09-23		www.votebundy.com_2022-05-23-16-06-03
2022-09-23		diegorodriguez.org_2022-05-23-16-06-15
2022-09-23		www.votebundy.com_2022-05-23-16-06-16
2022-09-23		www.babycyrus.com_2022-05-23-16-06-05
2022-09-23		team.votebundy.com_2022-05-23-16-06-16
2022-09-23		www.babycyrus.com_2022-05-23-16-06-18
2022-09-23		babycyrus.com_2022-05-23-16-06-17
2022-09-23		babycyrus.com_2022-05-23-16-05-53
2022-09-23		www.babycyrus.com_2022-05-23-16-06-16
2022-09-23		babycyrus.com_2022-05-23-16-06-18
2022-09-23		www.babycyrus.com_2022-05-23-16-06-18
2022-09-23		www.babycyrus.com_2022-05-23-16-06-27
2022-09-23		team.votebundy.com_2022-05-23-16-06-28

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Date Provided	Bates	Item
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2022-09-23		www.diegorodriguez.org_2022-05-23-16-06-35
2022-09-23		www.babycyrus.com_2022-05-23-16-06-38
2022-09-23		diegorodriguez.org_2022-05-23-16-06-37
2022-09-23		www.babycyrus.com_2022-05-23-16-06-44
2022-09-23		www.babycyrus.com_2022-05-23-16-06-46
2022-09-23		babycyrus.com_2022-05-23-16-06-47
2022-09-23		diegorodriguez.org_2022-05-23-16-06-18
2022-09-23		www.votebundy.com_2022-05-23-16-06-42
2022-09-23		team.votebundy.com_2022-05-23-16-06-42
2022-09-23		www.votebundy.com_2022-05-23-16-06-47
2022-09-23		diegorodriguez.org_2022-05-23-16-06-50
2022-09-23		babycyrus.com_2022-05-23-16-06-50
2022-09-23		www.babycyrus.com_2022-05-23-16-06-54
2022-09-23		www.votebundy.com_2022-05-23-16-06-57
2022-09-23		team.votebundy.com_2022-05-23-16-06-53
2022-09-23		team.votebundy.com_2022-05-23-16-07-06
2022-09-23		www.babycyrus.com_2022-05-23-16-07-03
2022-09-23		www.babycyrus.com_2022-05-23-16-07-12
2022-09-23		www.babycyrus.com_2022-05-23-16-07-13
2022-09-23		babycyrus.com_2022-05-23-16-07-14
2022-09-23		www.babycyrus.com_2022-05-23-16-07-15
2022-09-23		www.votebundy.com_2022-05-23-16-07-25
2022-09-23		www.babycyrus.com_2022-05-23-16-07-27
2022-09-23		www.votebundy.com_2022-05-23-16-07-33
2022-09-23		team.votebundy.com_2022-05-23-16-07-30
2022-09-23		www.babycyrus.com_2022-05-23-16-07-33
2022-09-23		www.babycyrus.com_2022-05-23-16-07-36
2022-09-23		babycyrus.com_2022-05-23-16-07-35
2022-09-23		babycyrus.com_2022-05-23-16-07-41
2022-09-23		www.babycyrus.com_2022-05-23-16-07-41
2022-09-23		team.votebundy.com_2022-05-23-16-07-45
2022-09-23		www.votebundy.com_2022-05-23-16-07-45
2022-09-23		www.babycyrus.com_2022-05-23-16-07-51
2022-09-23		www.babycyrus.com_2022-05-23-16-07-53
2022-09-23		babycyrus.com_2022-05-23-16-07-56
2022-09-23		www.babycyrus.com_2022-05-23-16-07-57
2022-09-23		www.votebundy.com_2022-05-23-16-07-58
2022-09-23		team.votebundy.com_2022-05-23-16-08-01
2022-09-23		team.votebundy.com_2022-05-23-16-08-05
2022-09-23		babycyrus.com_2022-05-23-16-08-06
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2022-09-23		babycyrus.com_2022-05-23-16-08-18
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2022-09-23		team.votebundy.com_2022-05-23-16-08-22
2022-09-23		www.babycyrus.com_2022-05-23-16-08-23
2022-09-23		babycyrus.com_2022-05-23-16-08-25
2022-09-23		www.babycyrus.com_2022-05-23-16-08-31
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2022-09-23		www.votebundy.com_2022-05-23-16-08-33
2022-09-23		babycyrus.com_2022-05-23-16-07-13

Documents		
Date Provided	Bates	Item
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2022-09-23		team.votebundy.com_2022-05-23-16-08-37
2022-09-23		babycyrus.com_2022-05-23-16-08-46
2022-09-23		www.votebundy.com_2022-05-23-16-08-46
2022-09-23		team.votebundy.com_2022-05-23-16-08-41
2022-09-23		babycyrus.com_2022-05-23-16-08-40
2022-09-23		www.babycyrus.com_2022-05-23-16-08-50
2022-09-23		www.votebundy.com_2022-05-23-16-08-56
2022-09-23		www.babycyrus.com_2022-05-23-16-08-50
2022-09-23		team.votebundy.com_2022-05-23-16-08-57
2022-09-23		babycyrus.com_2022-05-23-16-08-59
2022-09-23		www.babycyrus.com_2022-05-23-16-09-04
2022-09-23		babycyrus.com_2022-05-23-16-09-11
2022-09-23		www.votebundy.com_2022-05-23-16-09-15
2022-09-23		www.babycyrus.com_2022-05-23-16-09-15
2022-09-23		babycyrus.com_2022-05-23-16-09-11
2022-09-23		www.votebundy.com_2022-05-23-16-09-19
2022-09-23		team.votebundy.com_2022-05-23-16-09-17
2022-09-23		babycyrus.com_2022-05-23-16-09-20
2022-09-23		team.votebundy.com_2022-05-23-16-09-25
2022-09-23		babycyrus.com_2022-05-23-16-09-31
2022-09-23		team.votebundy.com_2022-05-23-16-09-30
2022-09-23		www.votebundy.com_2022-05-23-16-09-28
2022-09-23		www.babycyrus.com_2022-05-23-16-09-37
2022-09-23		www.votebundy.com_2022-05-23-16-09-49
2022-09-23		babycyrus.com_2022-05-23-16-09-41
2022-09-23		team.votebundy.com_2022-05-23-16-09-54
2022-09-23		www.votebundy.com_2022-05-23-16-09-55
2022-09-23		babycyrus.com_2022-05-23-16-10-00
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2022-09-23		team.votebundy.com_2022-05-23-16-10-05
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2022-09-23		www.votebundy.com_2022-05-23-16-10-06
2022-09-23		babycyrus.com_2022-05-23-16-10-26
2022-09-23		team.votebundy.com_2022-05-23-16-10-27
2022-09-23		babycyrus.com_2022-05-23-16-10-25
2022-09-23		www.votebundy.com_2022-05-23-16-10-28
2022-09-23		team.votebundy.com_2022-05-23-16-10-43
2022-09-23		www.votebundy.com_2022-05-23-16-10-38
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2022-09-23		www.votebundy.com_2022-05-23-16-11-08
2022-09-23		gear.votebundy.com_2022-05-23-16-11-14
2022-09-23		team.votebundy.com_2022-05-23-16-11-15
2022-09-23		babycyrus.com_2022-05-23-16-11-20
2022-09-23		www.votebundy.com_2022-05-23-16-11-21
2022-09-23		babycyrus.com_2022-05-23-16-11-24
2022-09-23		www.votebundy.com_2022-05-23-16-11-28
2022-09-23		www.votebundy.com_2022-05-23-16-11-44
2022-09-23		team.votebundy.com_2022-05-23-16-10-38
2022-09-23		www.votebundy.com_2022-05-23-16-11-47
2022-09-23		team.votebundy.com_2022-05-23-16-11-50
2022-09-23		www.votebundy.com_2022-05-23-16-10-48

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Date Provided	Bates	Item
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2022-09-23		www.votebundy.com_2022-05-23-16-12-05
2022-09-23		team.votebundy.com_2022-05-23-16-11-51
2022-09-23		team.votebundy.com_2022-05-23-16-11-59
2022-09-23		www.votebundy.com_2022-05-23-16-12-22
2022-09-23		team.votebundy.com_2022-05-23-16-12-27
2022-09-23		www.votebundy.com_2022-05-23-16-12-28
2022-09-23		team.votebundy.com_2022-05-23-16-12-30
2022-09-23		www.votebundy.com_2022-05-23-16-12-39
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2022-09-23		team.votebundy.com_2022-05-23-16-13-08
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2022-09-23		www.votebundy.com_2022-05-23-16-13-16
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2022-09-23		team.votebundy.com_2022-05-23-16-13-52
2022-09-23		team.votebundy.com_2022-05-23-16-13-43
2022-09-23		www.votebundy.com_2022-05-23-16-13-46
2022-09-23		www.votebundy.com_2022-05-23-16-13-59
2022-09-23		team.votebundy.com_2022-05-23-16-14-15
2022-09-23		www.votebundy.com_2022-05-23-16-14-08
2022-09-23		team.votebundy.com_2022-05-23-16-14-18
2022-09-23		www.votebundy.com_2022-05-23-16-14-20
2022-09-23		www.votebundy.com_2022-05-23-16-14-40
2022-09-23		team.votebundy.com_2022-05-23-16-14-28
2022-09-23		team.votebundy.com_2022-05-23-16-14-54
2022-09-23		team.votebundy.com_2022-05-23-16-14-54
2022-09-23		www.votebundy.com_2022-05-23-16-15-00
2022-09-23		www.votebundy.com_2022-05-23-16-15-00
2022-09-23		www.votebundy.com_2022-05-23-16-15-22
2022-09-23		team.votebundy.com_2022-05-23-16-15-30
2022-09-23		team.votebundy.com_2022-05-23-16-15-31
2022-09-23		www.votebundy.com_2022-05-23-16-15-47
2022-09-23		www.votebundy.com_2022-05-23-16-15-36
2022-09-23		team.votebundy.com_2022-05-23-16-15-50
2022-09-23		www.votebundy.com_2022-05-23-16-15-57
2022-09-23		team.votebundy.com_2022-05-23-16-16-06
2022-09-23		team.votebundy.com_2022-05-23-16-16-08
2022-09-23		www.votebundy.com_2022-05-23-16-16-12
2022-09-23		team.votebundy.com_2022-05-23-16-16-27
2022-09-23		www.votebundy.com_2022-05-23-16-16-27
2022-09-23		www.votebundy.com_2022-05-23-16-16-38
2022-09-23		www.votebundy.com_2022-05-23-16-16-47
2022-09-23		www.votebundy.com_2022-05-23-16-16-51
2022-09-23		team.votebundy.com_2022-05-23-16-15-08
2022-09-23		team.votebundy.com_2022-05-23-16-16-47
2022-09-23		team.votebundy.com_2022-05-23-16-17-13
2022-09-23		www.votebundy.com_2022-05-23-16-17-15
2022-09-23		www.votebundy.com_2022-05-23-16-17-19
2022-09-23		team.votebundy.com_2022-05-23-16-17-23
2022-09-23		www.votebundy.com_2022-05-23-16-17-29

Documents		
Date Provided	Bates	Item
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2022-09-23		team.votebundy.com_2022-05-23-16-17-49
2022-09-23		www.votebundy.com_2022-05-23-16-17-52
2022-09-23		www.votebundy.com_2022-05-23-16-17-54
2022-09-23		team.votebundy.com_2022-05-23-16-18-00
2022-09-23		www.votebundy.com_2022-05-23-16-18-07
2022-09-23		www.votebundy.com_2022-05-23-16-18-12
2022-09-23		www.votebundy.com_2022-05-23-16-18-25
2022-09-23		www.votebundy.com_2022-05-23-16-18-34
2022-09-23		www.votebundy.com_2022-05-23-16-18-29
2022-09-23		team.votebundy.com_2022-05-23-16-18-36
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2022-09-23		www.votebundy.com_2022-05-23-16-18-56
2022-09-23		www.votebundy.com_2022-05-23-16-19-01
2022-09-23		team.votebundy.com_2022-05-23-16-19-08
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2022-09-23		team.votebundy.com_2022-05-23-16-19-13
2022-09-23		www.votebundy.com_2022-05-23-16-19-30
2022-09-23		www.votebundy.com_2022-05-23-16-19-36
2022-09-23		team.votebundy.com_2022-05-23-16-19-50
2022-09-23		team.votebundy.com_2022-05-23-16-19-32
2022-09-23		team.votebundy.com_2022-05-23-16-19-54
2022-09-23		team.votebundy.com_2022-05-23-16-19-50
2022-09-23		gear.votebundy.com_2022-05-23-16-20-15
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2022-09-23		www.votebundy.com_2022-05-23-16-20-32
2022-09-23		www.votebundy.com_2022-05-23-16-20-48
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2022-09-23		team.votebundy.com_2022-05-23-16-21-08
2022-09-23		team.votebundy.com_2022-05-23-16-21-09
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2022-09-23		www.votebundy.com_2022-05-23-16-20-15
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2022-09-23		team.votebundy.com_2022-05-23-16-21-51
2022-09-23		team.votebundy.com_2022-05-23-16-22-15
2022-09-23		www.votebundy.com_2022-05-23-16-22-06
2022-09-23		team.votebundy.com_2022-05-23-16-22-50
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2022-09-23		www.diegorodriguez.org_2022-05-23-16-25-39
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2022-09-23		twitter.com_2022-05-23-16-31-35
2022-09-23		www.peoplesrights.org_2022-05-31-16-03-34
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2022-09-23		www.peoplesrights.org_2022-05-31-16-04-09
2022-09-23		Baby Cyrus Was Returned Home Today!!
2022-09-23		Your children do not belong to you!
2022-09-23		Emergency Message Cyrus
2022-09-23		CD Radio - Ammon Bundy - Idaho Gubernatorial Candidate " Live
2022-09-23		Idaho CPS took Baby Cyrus
2022-09-23		Ammon and Wendy Arrested
2022-09-23		Baby Cyrus case has been dismissed!!!
2022-09-23		2022-03-12 1811 Breaking-Ammon Bundy Arrested-Says Baby Cyrus Taken
2022-09-23		2022-03-12 Bundy Twitter Statement 2022-03-18 AM1012
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2022-09-23		2022-03-18 AM1001 Protest at St. Luke's over medical kidnapping News idahopress
2022-09-23		2022-03-18 AM1005 Meridian leaders condemn doxing related to child
2022-09-23		2022-03-18 AM1007 Ammon Bundy Arrested At Saint Lukes in Meridian
2022-09-23		2022-03-18 AM1008 Far-right activits arrested at hospital protest
2022-09-23		2022-03-18 AM1014 WA Post_Idaho hospital locks down amid far
2022-09-23		2022-03-18 AM1016 St. Luke_s_ The _behavior we_ve seen ov..
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2022-09-23		2022-03-18 AM1032 Ammon Bundy gets probation, no jail, in 2nd trespassing conviction
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2022-09-23		2022-03-18 AM1035 Ammon Bundy for Governor _ Facebook
2022-09-23		2022-03-18 AM1049 American Militia Freedom Forces Issue Call To Action Regarding Kidnapped Idaho Baby Cyrus (Video)
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2022-09-23		2022-03-20 AM1015 Idahoans Protest Controversial Child Removal [Photos]
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2022-09-23		2022-03-22 AM1047 IDAHO FREEDOM FAIR & PACT RALLY _ Area ..
2022-09-23		2022-03-22 AM1121 Profile_ Diego Rodriguez * Institute for Research and Education on Human Rights
2022-09-23		2022-03-22 PM0102 Roth Wanted Poster
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2022-09-23		2022-03-22 The State wants to destroy your family_Screenshot 2022-03-22 at 16.37
2022-09-23		2022-03-23 PM0103 WHOIS search results for Freedomman.org
2022-09-23		2022-03-23 PM0107 WHOIS search results_Powermarketing.net
2022-09-23		2022-03-23 PM0110 WHOIS search results_PeoplesRights.org
2022-09-23		2022-03-23 PM0120 Power Marketing Agency ISOS B0665-2614
2022-09-23		2022-03-23 PM0120 Power Marketing Consultants_Diego Rodrigues ISOS A0089-4238

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2022-09-23		2022-03-23 PM0122 Power Marketing Consultants_Diego Rodriguez ISOS B0674-1859
2022-09-23		2022-03-24 AM1132 Yelp Reviews
2022-09-23		2022-03-24 PM0223 GiveSendGo - Save Baby Cyrus from Medic...he #1 Free Christian Fundraising Site
2022-09-23		2022-03-24 PM0224 GiveSendGo
2022-09-23		2022-03-24 PM0451 Medical Kidnapping in Boise, Idaho
2022-09-23		2022-03-24 PM0453 CALL TO ACTION CPS (Child Protective Services) Using Powers of The State To Legally Kidnap 6 Children Area News People's Rights
2022-09-23		2022-03-24 PM0501 Freedomman_COVID Kidnapping (Ongoing List of Cases)
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2022-09-23		2022-03-24 PM0519 News - Medical Kidnap
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2022-09-23		2022-03-24 PM0523 Idaho Judge Sanctions Medical Kidnapping and Child Trafficking as Innocent Baby Suffers in State Care
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2022-09-23		2022-03-28 Screenshots from PACT showing Dr. in presentation
2022-09-23		2022-04-04 Dennis Colton Boyles_Attorney Roster Search __ State Bar
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2022-09-23		2022-04-06 AM1049 April 5th - There is ZERO Evidence for Imminent Danger __ Freedom Man Press
2022-09-23		2022-04-06 AM1050 April 3rd - Adjudicatory Hearing Postponed __ Freedom Man Press
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2022-09-23		2022-04-06 AM1053 April 1st - The Impossibility of CPS So..
2022-09-23		2022-04-06 AM1056 March 30th - They TRIED to take Baby Cyrus again! __ Freedom Man Press
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2022-09-23		2022-04-08 AM1139 BABY CYRUS WAS KIDNAPPED!!! _ Campaign News _ Ammon Bundy for Governor
2022-09-23		2022-04-08 AM1139 Was Helping Baby Cyrus Come Home an App..
2022-09-23		2022-04-28 AM1021 Meet Kelly Shoplock, An Evil Cog In Idaho's Child Trafficking Machine
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2022-09-23		2022-05-17 PM1222 About _ Diego Rodriguez
2022-09-23		2022-05-17 PM1223 Diego Rodriguez _ Author _ Speaker _ Entrepreneur
2022-09-23		2022-06-29 PM0233 Idaho extremists target judges, prosecu..
2022-09-23		Baby Cyrus Update Archive St. Lukes
2022-09-23		The State wants to destroy your family_Screenshot 2022-03-22 at 16.37.53
2022-09-23		Web capture_18-3-2022_104454_pjmedia.com
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2022-09-23		2016-10-28 Ammon Bundy_s lawyer tackled, Tasered b...Oregon standoff trial - oregonlive
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2022-09-23		2022-05-11 PM0402 East Idaho News_Boise hospital sues Ammon Bundy, others..
2022-09-23		2022-05-11 PM0403 Idaho Press St. Luke_s files lawsuit against Ammon ...are case _ Local News _ idahopress
2022-09-23		2022-05-11 PM0404 Idaho News 6 St. Luke's Suing
2022-09-23		2022-05-11 PM0407 KTVB_St. Luke_s files lawsuit against Ammon Bundy, others _ ktvb
2022-09-23		2022-05-11 PM0408 Idaho Capital Sun_St. Luke_s hospital system sues Bundy, ..
2022-09-23		2022-05-11 PM0409 KMVT 11_St Luke's Suing
2022-09-23		2022-05-11 PM0410 Big Country News_St. Luke's hospital system sues Bundy, ... Idaho _ bigcountrynewsconnection
2022-09-23		2022-05-11 PM0458 FL Times_Hospital sues Ammon Bundy, others invol...ld welfare case _ Nation _ fltimes
2022-09-23		2022-05-11 PM0459 Hastings Tribune_Hospital sues Ammon Bundy, others invol...se _ Agriculture
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2022-09-23		2022-05-23 AM0848 Tweets with replies by Ammon Bundy (@RealABundy) _ Twitter
2022-09-23		2022-05-23 AM0851 Keep Idaho IDAHO Ralley
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2022-09-23		2022-06-06 PM0113 GiveSendGo - Save Baby Cyrus from Medic...he #1 Free Christian Fundraising Site
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2022-09-23		2022-07-08 PM0148 My Response to the Idaho Statesman Rega...St
2022-09-23		2022-07-08 PM0201 Comments on Diego Rodriguez article
2022-09-23		2022-07-13 AM0852 St. Luke's legal flub extends lawsuit against Ammon Bundy
2022-09-23		2022-07-13 AM0937 Ammon Bundy and Diego Rodriguez get thr..
2022-09-23		2022-07-13 AM0939 Judge rejects Boise hospital_s request ..
2022-09-23		2022-07-13 AM1055 Baby Cyrus Story
2022-09-23		2022-07-13 AM1057 March 12th - Original Story of What Happened _ Freedom Man Press
2022-09-23		2022-07-13 AM1059 Baby Cyrus Update Archive
2022-09-23		2022-07-13 AM1141 Florida Business Address _ Orlando Florida Virtual Business Address
2022-09-23		2022-07-13 PM1220 Locations - PhysicalAddress
2022-09-23		2022-07-14 AM0939 Ammon Bundy and Diego Rodriguez get Thr...on in St
2022-09-23		2022-07-14 AM1128 Baby Cyrus Update! _ Area News _ People_s Rights - Claim, Use, Defend
2022-09-23		2022-07-14 AM1141 EXCLUSIVE RELEASE_ NEW _ These Little Ones_ Trailer
2022-09-23		2022-07-18 Warrant issued for arrest of Idaho man with ties to People's Rights Network
2022-09-23		2022-07-21 AM0916 Warrant issued for Ammon Bundy associat..
2022-09-23		2022-07-25 AM0755 Ammon Bundy and Diego Rodriguez get thr..
2022-09-23		2022-07-25 AM0758 How Cliven Bundy Brought Us Jan
2022-09-23		2022-07-25 AM0854 Judge rejects Boise hospital's request ..
2022-09-23		2022-07-26 AM1046 Idaho resurfaces for a new generation a..
2022-09-23		2022-08-02 AM0954 People Responsible for Cyrus_s Kidnapping - Reader Mode
2022-09-23		2022-08-02 AM0955 People Responsible for Cyrus_s Kidnapping
2022-09-23		2022-08-02 AM0957 Baby Cyrus Story
2022-09-23		2022-08-02 AM0959 Baby Cyrus _ Freedom Man Press

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2022-09-23		2022-08-02 AM1001 Press Release_ Statement on Ammon Bundy_s Arrest in Meridian - Reader Mode
2022-09-23		2022-08-02 AM1004 RealABundy Official Statement from March 12, 2022
2022-09-23		2022-08-11 AM 0855 Dono Custos Contact_ Web capture_11-8-2022_ 8551_ donocustos
2022-09-23		2022-08-11 AM0849 Donocustos.com Welcome_ Web capture_11-8-2022_ 84738_ donocustos
2022-09-23		2022-08-11 AM0852 Dono Custos FAQs_ Web capture_11-8-2022_ 85131_ donocustos
2022-09-23		2022-08-11 AM0854 Dono Custos Our Services_ Web capture_11-8-2022_ 85327_ donocustos
2022-09-23		2022-08-11 AM0900 Open Corporates_ Dono Custos, Inc
2022-09-23		2022-08-11 AM0902 Bizapedia.com_ Dono Custos, Inc
2022-09-23		2022-08-11 AM0903 Maria Moreiralopes Profiles in Cheyenne WY - Bizapedia
2022-09-23		2022-08-11 AM0904 Jorge Da Costa Profiles in Cheyenne WY - Bizapedia
2022-09-23		2022-08-11 PM1204 Ammon Bundy, The Freedom-Fighter Runnin..
2022-09-23		2022-08-22 AM0944 Baby Cyrus Health Update (from Marissa)
2022-09-23		2022-08-22 AM0946 Baby Cyrus Health Update (from Marissa)
2022-09-23		2022-08-22 AM0949 (14) Save Baby Cyrus _ Facebook
2022-09-23		2022-08-23 PM0247 Boise mayor says city cancelled Ammon Bundy campaign rally
2022-09-23		2022-08-30 PM0336 BABY WRONGFULLY TORN FROM ARMS OF MOTHER IN MERIDIAN, IDAHO _ Area News _ People's Rights - Claim, Use, Defend
2022-09-23		2022-09-01 PM0139 Marissa Case Docket Report
2022-09-23		2022-09-08 Comments on Bundy Facebook Live Video
2022-09-23		2022-09-22 PM0344 Ammon Bundy won't respond to lawsuit, S...action _ Local _ idahostatejournal
2022-09-23		2022-09-22 PM0347 Ammon Bundy won't respond to lawsuit, s...l action _ Local News _ idahopress
2022-09-23		2022-09-22 PM0349 Ammon Bundy won't respond to lawsuit, s..._ Idaho _ bigcountrynewsconnection
2022-09-23		2022-09-22 PM0351 Ammon Bundy won't respond to lawsuit, s..
2022-09-23		2022-09-22 PM0401 Ammon Bundy pays himself thousands in campaign cash - Idaho Capital Sun
2022-09-23		2022-09-27 PM0324 GOVERNOR_S RACE_ Little faces four chal...eries... _ Eye on Boise _ idahopress
2022-09-23		2022-09-27 PM0332 Little faces four challengers on Nov. ballot _ Local News _ idahopress
2022-09-23		2022-10-05 AM0642 Privacy Policy _ Save Baby Cyrus
2022-09-23		2022-10-05 AM0643 Privacy Policy _ Save Baby Cyrus
2022-09-23		2022-10-05 AM0912 Baby Cyrus Health Update (from Marissa)
2022-09-23		2022-10-07 PM0318 Diego Rodriguez · Profile · Disqus
2022-09-23		2022-10-12 AM1049 Ammon Bundy calls judge 'wicked' after ..
2022-09-23		2022-10-12 AM1129 Bundy paid \$4,000 in campaign funds to ..
2022-09-23		2022-10-12 AM1138 Bundy paid \$4,000 in campaign funds to ...irm... _ Eye on Boise _ idahopress
2022-09-23		2022-10-12 AM1140 Bundy paid \$4,000 in campaign funds to ..
2022-09-23		2022-10-12 AM1141 Ammon Bundy claimed campaign payment to..
2022-09-23		2022-10-12 AM1143 Standing up for the First Amendment _ Opinion _ minicassia
2022-09-23		2022-10-12 AM1154 #KeepIdahoIDAHO - Twitter Search _ Twitter
2022-09-23		2022-10-12 AM1156 Ammon Bundy and Diego Rodriguez absent in court hearing _ ktvb
2022-09-23		2022-10-12 AM1158 Bundy, Rodriguez fail to show up for co...St
2022-09-23		2022-10-12 PM0159 Op-Ed_ Hospital, Doctor, Children's Pro..
2022-09-23		2022-10-12 PM0201 Hospital, Doctor, Children's Protective..
2022-09-23		2022-10-12 PM0236 Boise mayor says proposed Ammon Bundy e...s process _ News-Examiner _ hjnews
2022-09-23		2022-10-12 PM1201 Rattlesnake Rita on Twitter_ _#idpol Le...1_5 https___t
2022-09-23		2022-10-12 PM1203 Police_ Ammon Bundy arrested in trespassing case - Day of the News

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2022-09-23		2022-10-12 PM1208 Bundy ignoring lawsuit due to _distraction__ ktvb
2022-09-23		2022-10-12 PM1210 Ammon Bundy says running for governor m...han fighting St
2022-09-23		2022-10-17 PM0557 Police_ Ammon Bundy arrested in trespassing case - WTOP News
2022-09-23		2022-10-17 PM0622 #KeepIdahoIDAHO - Twitter Search _ Twitter
2022-09-23		2022-10-18 AM0733 Diego For Senate
2022-09-23		2022-10-18 AM0737 Diego Rodriguez (@DiegoForSenate) _ Twitter
2022-09-23		3. 2022-03-20 Critical Disclosure Radio_Guest Diego Rodriguez re Baby Cyrus
2022-09-23		2022-03-20 PM0611 Lt. Gov Janice McGeachin
2022-09-23		2022-08-02 PM0230 White-Rose-Resistance-Hour-guests-The-Chavoya-Family-discuss-Baby-Cyrus-final-vidiget-dot-com-712008
2022-09-23		2022-08-30 PM0237 Rick Green_Saving Baby Cyrus
2022-09-23		2022-09-07 PM0452 Facebook.com-RealAmmonBundy-Videos-423278493120502
2022-09-23		2022-09-12 PM0110 A.Bundy Video re Boise Pride
2022-09-23		2022-09-16 Seeking The Truth JoshWho News [FFxPf.caa]
2022-09-23		3180236660
2022-09-23		3180256187
2022-09-23		Ammon and Wendy Arrested
2022-09-23		Baby Cyrus case has been dismissed
2022-09-23		Baby Cyrus is worse now
2022-09-23		Baby Cyrus Presser P.A.C.T. March 26, 2022
2022-09-23		BABY CYRUS REUNITED WITH HIS FAMILY [North Idaho Exposed
2022-09-23		Baby Cyrus Was Returned Home Today!!
2022-09-23		Call to Action- Baby Cyrus, now or never_
2022-09-23		Emergency Message Cyrus
2022-09-23		Frightening update on baby Cyrus
2022-09-23		Grandpa speaks_Diego Rodriguez
2022-09-23		Idaho CPS took Baby Cyrus
2022-09-23		KTVB Video re lockdown ended_videoplayback (2)
2022-09-23		liveshow_20220520_0958
2022-09-23		March 17th 5PM Press Conference at Dept of Health and Welfare_Diego Rodriguez
2022-09-23		P.A.C.T. RALLY INFO by Diego Rodriguez_3186079460
2022-09-23		Personal Accountability Works
2022-09-23		Save Baby Cyrus Press Conf (full update) for March 14, 2022_Diego Rodriguez
2022-09-23		Save Baby Cyrus Press Conf (full update) for March 15, 2022_Diego Rodriguez
2022-09-23		Save Baby Cyrus_ Interview with Ammon Bundy
2022-09-23		Save Baby Cyrus-Press Conf (full update) for March 13, 2022_Diego Rodriguez
2022-09-23		Save Baby Cyrus-Speech+Prayer by Diego Rodriguez
2022-09-23		They arrested baby Cyrus’ mother last night too
2022-09-23		Update on baby Cyrus
2022-09-23		videoplayback (1)
2022-09-23		You will not take our children away! - Update Baby Cyrus
2022-09-23		Your children do not belong to you!
2022-09-23		4. Stew Peters Show Interview w DR 2022-03-15
2022-09-23		5. Front Porch Live, interview with Rodriguez on March 20
2022-09-23		12. The Alpha Warrior Show, interview with Rodriguez on March 23
2022-09-23		15. Pete Santilli Show, interview with Rodriguez on March 29
2022-09-23		18. Whistleblower Pie interviews with DR and AB on 3-31
2022-09-23		Facebook Video People's Rights Founded by AB
2022-09-23		Patriot Streetfighter, interview with Rodriguez on March 25
2022-09-23		Stew Peters Show Interview w Lt. Gov w clip of DR
2022-09-23		WBLive Interview with DR 2022-03-31
2022-09-23		The RSB Show 3-22-22 - Biden New World Order, Diego Rodriguez, Medical Kidnapping
2022-09-23		Unchecked_Government_Power_Turned_Against_a_Family

Documents		
Date Provided	Bates	Item
2022-12-01		St. Lukes_Bundy _ Declaration of Camille LaCroix MD DFAPA ISO Motion for Leave to Amend Complaint20052914v1 (002) (004)[20200126v1]
2022-02-17		2023-01-19docA Protective Order
2022-03-06		Abby Decl Ex C_Phone Call Heat Map
2022-03-06		Abby Decl Ex D_Call Logs
2022-03-06		Ammon's Army_Inside the Far-Right People's Rights Network [IREHR] Chapters 1-13
2022-03-06		2022-03-11 PACT Rally Details_PV_C9976248S
2022-03-06		2022-03-12 Press Conference Tomorrow-show up at 2pm_PV_C11694246S
2022-03-06		2022-03-12 to 2022-03-16 Baby Cyrus Press Conferences_PV_C11694093S
2022-03-06		2022-03-12_Original Story-Do These 3 Things_PV_C11694149S
2022-03-06		2022-03-12_Your Prayers Are Working_PV_C11694002S
2022-03-06		2022-03-13 St. Luke's is Harming Cyrus-Stand with us to fight_PV_C11694208S
2022-03-06		2022-03-13_Cyrus was Kidnapped-Request Presence at Hospital Every Day 10AM-8PM_PV_C9948611S
2022-03-06		2022-03-13_Donate to Help Baby Cyrus_PV_C11693969S
2022-03-06		2022-03-13_Positive Development-All You Have Done is Working_PV_C11694059S
2022-03-06		2022-03-14_He is in Worse Condition-You Decide Who He Should Be With_PV_C11694151S
2022-03-06		2022-03-15_Emergency Update-Protest Tomorrow_PV_C11694369S
2022-03-06		2022-03-16 Protest Daily_PV_C9976247S
2022-03-06		2022-03-16 Shelter Care Hearing-What You Can Do_PV_C11694413S
2022-03-06		2022-03-16_Prayer & Protesting Continues_PV_C11694160S
2022-03-06		2022-03-17 Cyrus Doesn't Crawl Anymore-See you at the Press Conference_PV_C11694206S
2022-03-06		2022-03-18_Baby Cyrus is Home (& Rally)_PV_C11694022S
2022-03-06		2022-03-19 P.A.C.T. Rally-Share Your CPS Story_PV_C11694390S
2022-03-06		2022-03-21_P.A.C.T. Rally in Emmett_PV_C11694396S
2022-03-06		2022-03-22 Open Letter-Contact Sheriff & Police_PV_C11694198S
2022-03-06		2022-03-22 Police & Sheriff Challenged-Contact them_PV_C11694272S
2022-03-06		2022-03-26 P.A.C.T. Rally_PV_C11694316S
2022-03-06		2022-03-30_They Tried to Take Cyrus Again_Patriots on Red Alert_PV_C11694085S
2022-03-06		2022-04-03_Hearing Postponed-Unless People Act & React_PV_C11694120S
2022-03-06		2022-04-05_Show of Solidarity for Baby Cyrus on April 8th_PV_C11694058S
2022-03-06		2022-04-05_Zero Evidence for Imminent Danger-What Are You Going to Do About It_PV_C11694325S
2022-03-06		2022-04-20_Be a Whistleblower_PV_C11694394S
2022-03-06		2022-04-27 Come to Cyrus' Bday Party & Hear what you can do_PV_C11694207S
2022-03-06		2022-05-05 Cyrus Was Kidnapped-Request for Public Outcry, Publicly Shame and Pressure_SLHS_0002047
2022-03-06		2023-01-09 Fortier & Thompson Lesbian Power Couple-4 Things You Can Do_PV_C11694177S
2022-03-06		2023-01-12_They Lied to You-Act Now-Share the Video_PV_C11694287S
2022-03-06		2023-02-09 DR Challenge to St. Luke's & EFS to Respond_SLHS_0002022
2022-03-06		Undated_CPS-Demand that your Legislatures Abolish CPS_SLSH_0002031
2022-03-06		Undated_How You Can Help-Specific Action Steps You Can Take to Help_PV_C11694048S
2022-03-06		Undated_Lessons Learned-Join People's Rights_PV_C11694244S
2022-03-06		Undated_People Responsible-Identify the Police Officers_PV_C11694282S
2022-03-06		Undated_Protect Your Children From CPS-Join People's Rights_PV_C11694222S
2022-03-06		Undated_The Entire Kidnapping Story_Let this Case Rise to National Prominence as a Test Case_PV_C11759872S
2022-03-06		Undated_The Infinite Power of Family-What is Needed to Fight a Battle Like This_PV_C11694109S
	Post Disclosure through end	

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Date Provided	Bates	Item
2023-05-31	MPD-000004	Email to Meridian City
2023-05-31	MPD-000026	Message from Thomas Shelbert
2023-05-31	MPD-000027	Message from Boey Jandelero
2023-05-31	MPD-000028	Message from Anthony Reyome
2023-05-31	SLHS_0007550	2022-03-14 Transcript
2023-05-31	SLHS_0007558	2022-03-12 Transcript
2023-05-31	SLHS_0007581	2022-03-13 Transcript
2023-05-31	SLHS_0007596	2022-03-15 Transcript
2023-05-31	SLHS_0007613	2022-03-16 Transcript
2023-05-31	SLHS_0007993	2022-03-26 PACT Rally Transcript
2023-05-31	SLHS_0007867	2022-03-30 Transcript
2023-05-31	SLHS_0007867	2022-03-30 Transcript
2023-05-31	EP3082_SLHS_0007881	2022-08-13 Transcript
2023-05-31	SLHS_0007445	2023-01-27 Transcript
2023-05-31	EP3313_SLHS_0007933	2023-02-08 Transcript
2023-05-31	SLHS_0007506	2023-02-10 Transcript
2023-05-31	EP3322_SLHS_0008033	2023-02-13 Transcript
2023-05-31	SLHS_0008493	2023-02-21 Transcript
2023-05-31	SLHS_0008436	2023-04-27 Transcript
2023-05-31	SLHS_0008439	2023-04-29 Transcript
2023-05-31	SLHS_008480	2023-05-08 Transcript
2023-05-31	SLHS_0008543	2023-05-09 Transcript
2023-05-31	SLHS_0008367	2023-05-10 Transcript
2023-05-31	SLHS_0008566	2023-05-10 Transcript
2023-05-31	SLHS_0007626	Transcript - Exh I to 2023-12-18 Jensen Decl.
2023-05-31	SLHS_7786	Transcript - Exh 9
2023-05-31	SLHS_0007655	Transcript Exh 13
2023-05-31	SLHS_0007662	Transcript Exh 20
2023-05-31	SLHS_0007668	Transcript Exh 22
2023-05-31	SLHs_0007671	Transcript Exh 37
2023-05-31	SLHS_0007689	Transcript Exh 40
2023-05-31	SLHS_0007692	Transcript Exh 41
2023-05-31	SLHS_0007696	Transcript Exh 53
2023-05-31	SLHS_0007699	Transcript Exh 53
2023-05-31	SLHS_0007702	Transcript Exh 53
2023-05-31	SLHS_0007705	Transcript Exh 56
2023-05-31	SLHs_007715	Transcript Exh 57
2023-05-31	SLHS_007747	Transcript Exh 58
2023-05-31	SLHS_007752	Transcript Exh 59
2023-05-31	SLHS_0007755	Transcript Exh 60
2023-05-31	SLHS_0007762	Transcript Exh 61
2023-05-31	SLHS_0007766	Transcript Exh 63
2023-05-31	SLHs_000771	Transcript Exh 65
2023-05-31	SLHS_0007776	Transcript Exh 79
2023-05-31	SLHS_0007781	Transcript Exh 80

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2023-01-04		003. Redacted Records Provided on 3.14.22
2023-01-04		005. Unredacted Records Provided on 3.15.22
2023-01-04		006. Redacted Records Provided on 3.18.22 (Including CL and Request)
2023-01-04		007. Unredacted Version of 006 Prepared for H&H
2023-03-09		2022-08-22 AM0944 Baby Cyrus Health Update (from Marissa)
2023-03-09		2022-08-22 AM0949 (14) Save Baby Cyrus _ Facebook
2023-03-09		2022-10-12 PM0159 Op-Ed_ Hospital, Doctor, Children's Protective Services, Police, and Legal System Tried to Take Baby Cyrus From Loving Parents
2023-03-09		2022-10-12 PM0201 Hospital, Doctor, Children's Protective Services, Police, and Legal System Tried to Take Baby Cyrus From Loving Parents - The Published Reporter
2023-03-09		Pages from 2022-08-21 Telegram Posts re C.Diff PV_C11581211S
2023-03-09		2022-03-29 Eml re tube replacement_SD_REL0001580
2023-03-09		2022-03-29 Is Baby Cyrus Okay_SLHS_0000176
2023-03-09		2022-08-21 Telegram Posts re C. Diff_PV_C11581211S
2023-05-15	Post Disclosure through end	Government Subsidized Child Trafficking in America, Freedomman screencapture-freedomman-org-video-government-subsidized-child-trafficking-2023-05-15-12_40_26
2023-05-15		2023-05-08 LIVE - Entire Baby Cyrus Story Presentation, People's Rights Network screencapture-peoplesrights-org-news-view-2023-05-15-12_41_39
2023-05-15		2023-05-10 19-01-06_Freedom Man Zoom Meeting
2023-05-15		2023-05-10 Government Subsidized Child Trafficking - Diego Rodriguez telling the Baby Cyrus Story
2023-05-15		2023-05-10 Government Subsidized Child Trafficking-audio
2023-05-19	MPD Subpoena Response	2023-05-12 Meridian Police Department - Subpoena Response
2023-05-19		22-1545 Final (Meridian Police Department)
2023-05-19		22-1535 Final (Meridian Police Department)
2023-05-19		1535_0003_03-07-22_0335_jfuller_-_Case_audio
2023-05-19		1535_0004_03-07-22_1311_jfuller_-_Case_audio
2023-05-19		1535_0005_03-07-22_1336_jfuller_-_Case_audio
2023-05-19		1535_0006_03-07-22_1346_jfuller_-_Case_audio
2023-05-19		1535_0007_03-07-22_1351_jfuller_-_Case_audio
2023-05-19		1535_0008_03-07-22_1353_jfuller_-_Case_audio
2023-05-19		1535_0009_03-07-22_1354_jfuller_-_Case_audio
2023-05-19		1535_0010_03-07-22_1355_jfuller_-_Case_audio
2023-05-19		1535_0011_03-07-22_1355_jfuller_-_Case_audio
2023-05-19		1535_0016_03-11-22_2243_shansen_-_Audio
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M) (2)
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-2 (2)
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-2
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-3 (2)
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-3
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-4 (2)
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-4
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-5 (2)
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-5
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-6
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-7
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-8
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-9
2023-05-19		ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTING_OFFICERS_(M)-17
2023-05-19		Axon_Body_3_Video_2022-03-12_0024_X6033695S
2023-05-19		Axon_Body_3_Video_2022-03-12_0122_X6033695S
2023-05-19		Axon_Body_3_Video_2022-03-12_0241_X6033695S
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-2 - Shortcut

2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-2
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-3
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-4
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-5
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-6
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-7
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-8
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-9
2023-05-19		CHILDREN-INJURY_TO_CHILD(F);IMMINENT_DANGER;ARRESTS_&_SEIZURES-RESISTING_OR_OBSTRUCTION_OFFICERS(M)-10

Exhibit E-1

Documents		
Date Provided	Bates	Item
2023-02-09		Memorandum iso Motion for Contempt
2023-02-09		Affidavit of Jennifer Jensen iso Motion for Contempt with Exs
2023-02-09		Order Compelling Defendant Rodriguez to Respond to Discovery
2023-02-09		Order Granting Leave to File Third Amended Complaint That Includes Punitive Damages Claim All Defendants
		Red Sky Expert Report
	Post Disclosure through end	
2023-05-31	MPD-000004	Email to Meridian City
2023-05-31	MPD-000026	Message from Thomas Shelbert
2023-05-31	MPD-000027	Message from Boey Jandelero
2023-05-31	MPD-000028	Message from Anthony Reyome
2023-05-31	SLHS_0007550	2022-03-14 Transcript
2023-05-31	SLHS_0007558	2022-03-12 Transcript
2023-05-31	SLHS_0007581	2022-03-13 Transcript
2023-05-31	SLHS_0007596	2022-03-15 Transcript
2023-05-31	SLHS_0007613	2022-03-16 Transcript
2023-05-31	SLHS_0007993	2022-03-26 PACT Rally Transcript
2023-05-31	SLHS_0007867	2022-03-30 Transcript
2023-05-31	SLHS_0007867	2022-03-30 Transcript
2023-05-31	EP3082_SLHS_0007881	2022-08-13 Transcript
2023-05-31	SLHS_0007445	2023-01-27 Transcript
2023-05-31	EP3313_SLHS_0007933	2023-02-08 Transcript
2023-05-31	SLHS_0007506	2023-02-10 Transcript
2023-05-31	EP3322_SLHS_0008033	2023-02-13 Transcript
2023-05-31	SLHS_0008493	2023-02-21 Transcript
2023-05-31	SLHS_0008436	2023-04-27 Transcript
2023-05-31	SLHS_0008439	2023-04-29 Transcript
2023-05-31	SLHS_008480	2023-05-08 Transcript
2023-05-31	SLHS_0008543	2023-05-09 Transcript
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2023-05-31	SLHS_0008566	2023-05-10 Transcript
2023-05-31	SLHS_0007626	Transcript - Exh I to 2023-12-18 Jensen Decl.
2023-05-31	SLHS_7786	Transcript - Exh 9
2023-05-31	SLHS_0007655	Transcript Exh 13
2023-05-31	SLHS_0007662	Transcript Exh 20
2023-05-31	SLHS_0007668	Transcript Exh 22
2023-05-31	SLHS_0007671	Transcript Exh 37
2023-05-31	SLHS_0007689	Transcript Exh 40
2023-05-31	SLHS_0007692	Transcript Exh 41
2023-05-31	SLHS_0007696	Transcript Exh 53
2023-05-31	SLHS_0007699	Transcript Exh 53
2023-05-31	SLHS_0007702	Transcript Exh 53
2023-05-31	SLHS_0007705	Transcript Exh 56
2023-05-31	SLHS_007715	Transcript Exh 57
2023-05-31	SLHS_007747	Transcript Exh 58
2023-05-31	SLHS_007752	Transcript Exh 59

2023-05-31	SLHS_0007755	Transcript Exh 60
2023-05-31	SLHS_0007762	Transcript Exh 61
2023-05-31	SLHS_0007766	Transcript Exh 63
2023-05-31	SLHs_000771	Transcript Exh 65
2023-05-31	SLHS_0007776	Transcript Exh 79
2023-05-31	SLHS_0007781	Transcript Exh 80

Exhibit F-1

Documents		
Date Provided	Bates	Item
2023-01-27		2022-12-06 Sealed Declaration of CP Abbondandolo ISO Motion for Leave to Amend Complaint to Allege Punitive Damages
2023-01-27		2022-12-06 Sealed Declaration of C Roth ISO Motion for Leave to Amend Complaint to Allege Punitive Damages
2023-01-27		2022-12-06 Sealed Declaration of D Mesaros ISO Motion for Leave to Amend Complaint to Allege Punitive Damages
2023-01-27		Kim data_ED Visits March FY 22 Boise and Meridian
2023-01-27		Kim data_Protest Information 11.3.22
2023-02-23		Donn English - Declaration
2023-02-23		Dr. Jamie Price - Redacted Declaration
2023-02-23		Chris Roth - Redacted Declaration
2023-02-23		Jeffery Erickson - Declaration
2023-02-23		Marle Hoff - Declaration
2023-02-23		John Coggins - Declaration
2023-02-23		Tracy Jungman - Redacted Declaration
2023-02-23		Natasha Erickson - Redacted Declaration
2023-02-23		William Wood - Declaration
2023-02-23		Camille LaCroix, MD - Declaration
2023-02-23		C.P. Abbey Abbondandolo - Declaration
2023-02-24	SLHS_0000482 - 1730	Medical Records - Complete (SLHS_0000482 - 1730)
2023-02-24		2023-02-07 Affidavit of J Jensen in Support of St Luke Plaintiffs' Motion for Contempt Against A Bundy and PRN
2023-02-24		2023-02-17 Supplemental Affidavit of J Jensen in Support of Plaintiffs' Motion for Contempt Against A Bundy and PRN
2023-02-24		EX. I_Affidavit of Jennifer Jensen ISO Motion for Contempt [2022-12-28 IdahoDispatch Interview ABundy part 1 (from Rumble)
2023-02-24		2022-03-15 Emergency Message Cyrus - Go Back to the Hospital [11-3-22
2023-02-24		Exhibit 43_Ammon's Army_ Inside the Far-Right People's Rights Network * Institute for Research and Education on Human Rights
2023-02-24		2023-01-12 New Video Evidence Proves that Baby Cyrus was a Healthy Baby When Kidnapped By Meridian Police 4
2023-02-24		Damages Summary 2-23-23 - CONFIDENTIAL ATTORNEY WORK PRODUCT
2023-02-28		Security and Information Station FTE's FY21-FY23 CONFIDENTIAL ATTORNEY WORK PRODUCT
2023-02-28		Unplanned security expenses 2022-2023 - CONFIDENTIAL ATTORNEY WORK
2023-03-01		St. Luke's Exposed
2023-03-01		03-15-2022 Call to Action - Baby Cyrus, now or never [cannot hold them
2023-03-01		Brand Thornton (Twitter) - "All men of militia age...."
2023-03-01	EFS Declaration	2022-03-12 Update on baby Cyrus
2023-03-01	EFS Declaration	2022-03-13 Baby Cyrus is worse now
2023-03-01	EFS Declaration	2022-03-13 Frightening update on baby Cyrus
2023-03-01	EFS Declaration	2022-03-15 Emergency Message Cyrus - Go Back to the Hospital [11-3-22
2023-03-01	EFS Declaration	2022-03-16 Your children do not belong to you!
2023-03-01	EFS Declaration	2022-03-18 Baby Cyrus Was Returned Home Today!!
2023-03-01	EFS Declaration	2022-03-18 You will not take our children away! - Update Baby Cyrus
2023-03-01	EFS Declaration	2022-09-07 Ammon Bundy Facebook Live St. Luke's is Suing Me
2023-03-01	EFS Declaration	2022-03-13 2022-03-12 Save Baby Cyrus_ Interview with Ammon Bundy
2023-03-01	EFS Declaration	2022-03-14 Ammon Bundy_Baby Cyrus is worse now
2023-03-01	EFS Declaration	2022-03-17 Ammon Bundy_Your children do not belong to you!
2023-03-01	EFS Declaration	2022-01-05 How a standoff in Nevada years ago set the militia movement on a crash course with the US Capitol
2023-03-01	EFS Declaration	IREHR - Ammon's Army – Inside the Far-Right "People's Rights" Network
2023-03-01	EFS Declaration	IREHR - Middle American Neighborhood Nationalism, The Ideological Underpinnings of Ammon's Army
2023-03-01	EFS Declaration	People's Rights Network - What to Do When Someone Needs or Asks for Assistance in Defending Their Rights

2023-03-01	EFS Declaration	People's Rights Network - Claim, Use, Defend
2023-03-01	EFS Declaration	2021-10-26 Ammon Bundy claims new report undercounted his group's supporters by half
2023-03-01	EFS Declaration	2022-04-08 Why Do They Hate Ammon Bundy So Much-- Freedomman
2023-03-01	EFS Declaration	2020-10-06 Republican senator files cease and desist letter against conservative group responsible for mailer
2023-03-01	EFS Declaration	2022-04-05 How far right figures like Ammon Bundy cause chaos in US
2023-03-01	EFS Declaration	2022-03-15 American Militia Freedom Forces Issue Call to Action Regarding Kidnapped Idaho Baby Cyrus
2023-03-01	EFS Declaration	Timeline March 15 v5
2023-03-01	EFS Declaration	October 13, 2022 - Woke Cult - This is a Warning - Ammon Bundy
2023-03-01	EFS Declaration	September 27, 2022 - I Will Stand and Fight for Your Liberty - Ammon Bundy
		Katerina compilation
2023-03-05		Diego Rodriguez PR Announcement -3-14-2022
2023-03-06		Meridian Police Departmnet reports - State v. Bundy, Case No. CR01-22-08155
2023-03-07		2022-05-11 Complaint and Demand for Jury Trial
2023-03-07		Boise Security and Safety January-March 2016, 2ndQtr FY16 CONFIDENTIAL /
2023-03-07		Boise Security and Safety April-June 2016, 3rdQtr FY16 CONFIDENTIAL / ACP
2023-03-09		Reinstein - Opinion 2, Schedules 5-7
2023-03-09		Redline - Second Amended Complaint and Fourth Amended Complaint
2023-03-09		2023-02-22 The Bearded Patriots_Special Guest Ammon Bundy Peoples Rights
2023-03-09		2023-02-08 Pete Santilli Show-Joint Task Force & FBI Easter Raid Thwarted-Ammon Bundy
2023-03-09		2023-02-14 John B Wells Live-Ammon Bundy Uncensored
2023-03-09		Video Notes - Ammon Bundy Uncensored John B Wells Live
2023-03-10		Social Media in Operations - a Counter-Terrorism Perspective
		Red Sky Expert Report
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