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Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF TRACY W.
JUNGMAN, NP TO ESTABLISH
FOUNDATION**

I, Tracy W. Jungman, NP, declare and state as follows:

1. I am a nurse practitioner at St. Luke's CARES (Children at Risk Evaluation Services). I make this declaration based on my personal knowledge.
2. I am a Plaintiff in this case, and I make this declaration in order to expedite the authentication process for documents that I intend to testify about during the damages hearing in this matter.
3. I personally reviewed the Infant's medical records when treating him. **Trial Exhibit 513** is a true and correct copy of excerpts of the Infant's medical records with St. Luke's, which were attached as an exhibit to my December 6, 2022, Declaration in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages.
4. As a result of Defendants' conduct, I have taken safety measures to protect my family, my friends, and myself. On May 12, 2022, I purchased a home security system from Amazon. **Trial Exhibit 514** are true and correct copies of the receipts for the security system that I purchased. Personal information has been redacted safety and privacy reasons, including information regarding the order number, shipping address, payment method, and billing address.
5. I sent and received text messages pertaining to this case and my care and treatment of the Infant. I personally took my phone to a third-party vendor, Streamline Imaging, to have my text messages extracted and put into a report. **Trial Exhibit 515** is a true and correct copy of the text message report that I received from the third-party vendor. I reviewed the report, and I personally confirmed that the messages on the report are true, correct, and complete copies of text messages authored or received by me. Phone numbers have been redacted for safety and privacy reasons.

6. When I was treating the Infant, I personally weighed the Infant, reviewed the Infant's medical records, and created my own record to track the Infant's weight. **Trial Exhibit 516** is a true and correct copy of a record I created using the Infant's St. Luke's medical records, which accurately shows the Infant's weights for the respective days.

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

DATED: July 6, 2023.

Jungman, NP

Tracy W. Jungman, NP

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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

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

Ammon Bundy
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

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

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

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

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

freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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