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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

**PLAINTIFFS' PROPOSED ADVERSE
INFERENCES**

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 (collectively “Plaintiffs”), by and through their attorneys of record, hereby submit these proposed adverse inferences as to all Defendants.

On May 26, 2023, Plaintiffs moved for sanctions against Defendants and asked the Court to impose adverse inferences on Defendants for their failure to comply with their discovery obligations. *See* June 13, 2023, Memorandum Decision and Orders on Amended Motion for Sanctions against All Defendants (“Sanctions Order”) at 1. On June 13, 2023, the Court issued an Order stating that it would not enter adverse sanctions “at this time” because Plaintiffs did not provide a list of proposed inferences. *Id.* at 9, 18, 24, 27. The relevant, unanswered discovery requests are attached as exhibits to Declaration of Erik F. Stidham in Support of Plaintiffs’ Amended Motion for Sanctions Against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press, Freedom Man PAC, and People’s Rights Network dated May 27, 2023 (Stidham Decl). Now, Plaintiffs provide the Court with proposed inferences and request the Court impose each of the following:

A. PROPOSED INFERENCES AGAINST AMMON BUNDY

1. St. Luke’s Second Interrogatories and First Requests for Production¹.

INTERROGATORY NO. 14: Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including

¹ Stidham Decl. at Exs. A, G (attaching referenced discovery requests).

but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, the topic of discussion, and provide each username You used for each site. Stidham Decl. at Ex. A No. 13; see also Nos. 5-20 (discovery requests for communications and methods of communication).

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond, as required. Because Ammon Bundy refused to respond, you shall assume that Ammon Bundy communicated with others about this lawsuit, and that such communications support the Plaintiffs' claim for compensatory damages and punitive damages.

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

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

PROPOSED ADVERSE INFERENCE (Based on Interrogatories Nos. 28-29):
Ammon Bundy refused to respond, as required. Because Ammon Bundy refused to provide the

evidence, you shall assume that Ammon Bundy raised money and collected money for himself and the other Defendants, and that the amount of money raised and collected supports the Plaintiffs' claims for compensatory damages and punitive damages.

INTERROGATORY NO. 34: Identify all real property owned and/or controlled by You, including without limitation the nature of the real property interest, a description of the real property, the location of the real property, the fair market value of the real property, and any perfected security interests in the property.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond, as required. Because Ammon Bundy refused to provide the evidence, you shall assume that Ammon Bundy owns real property, and that his ownership of real property supports the Plaintiffs' claims for punitive damages.

INTERROGATORY NO. 35: Identify all Your Assets other than real property, including without limitation cash, cryptocurrency, accounts, accounts receivable, note receivable, other financial assets, equity interests, shares of stock, partnership interests, claims, choses in action, patents, trademarks, applications, other intangible property, inventory and equipment. With respect to accounts, identify the institution, location, and account number.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond, as required. Because Ammon Bundy refused to provide the evidence, you shall assume that Ammon Bundy's assets supports the Plaintiffs' claims for punitive damages.

INTERROGATORY NO. 38: State Your current Net Worth.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide his current net worth, which he was required to provide. You shall assume that Ammon Bundy's net worth supports Plaintiffs' claims for punitive damages.

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

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

PROPOSED ADVERSE INFERENCE (INTERROGATORIES Nos. 39-40):

Ammon Bundy refused to provide his current net worth, which he was required to provide. You shall assume that Ammon Bundy owns limited liability companies, partnerships, and corporations and that he is a beneficiary of trust, which supports Plaintiffs' claims for punitive damages.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, including, but not limited to emails, text messages, correspondence, or other ESI, which relate to the subject matter of this lawsuit.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond to discovery as required. You shall assume that the documents, correspondence, texts, and emails that Ammon Bundy failed to produce supported Plaintiffs' allegations and support Plaintiffs' claims for compensatory damages and punitive damages.

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

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond to discovery as required. You shall assume that there were documents, including text messages, emails, or other communications, that Bundy exchanged with other Defendants relating to this

lawsuit, and that the communication between Bundy and the other Defendants support Plaintiffs' allegations and support Plaintiffs' claims for damages and claims for punitive damages.

REQUEST FOR PRODUCTION NO. 21: Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Diego Rodriguez or any entity or association owned or controlled by Diego Rodriguez, including but not limited to Freedom Man Press, LLC, Freedom Man PAC, Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, and Power Marketing Agency, LLC.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide evidence showing contracts or business relationships between himself (or any of the entities he owns or controls) and Defendant Diego Rodriguez (or any entity Diego Rodriguez owns or controls), which he was required to provide. Because Ammon Bundy refused to provide the evidence, you shall assume that there is evidence showing contracts and business relationships between Bundy (or any of the entities he owns or controls) and Defendant Diego Rodriguez (or any entity Diego Rodriguez owns or controls) and that the evidence supports Plaintiffs' claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 22: Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide his state and federal tax returns for the years 2021 and 2022, which he was required to provide. Because Ammon Bundy refused to provide his tax returns, you shall assume that the tax returns support Plaintiffs' claim for punitive damages.

REQUEST FOR PRODUCTION NO. 25: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email,

protest, or otherwise disrupt or interfere with St. Luke's operations.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond, as required. You shall assume that Bundy called, texted, and email others in order to disrupt and interfere with St. Luke's operations.

REQUEST FOR PRODUCTION NO. 26: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to respond as required. Because Ammon Bundy refused to respond, you shall assume Bundy called, texted and emailed others directing them to pressure and influence the Plaintiffs in this case.

REQUEST FOR PRODUCTION NO. 40: Please produce copies of all federal and state income tax returns, including all schedules thereto, signed or filed by you or on your behalf with the Internal Revenue Service or any state between January 1, 2022, and the present.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide all state and federal tax returns signed or filed by him or on behalf of him from January 1, 2022, to present, which he was required to provide. You shall assume that Ammon Bundy's tax returns support Plaintiffs' claims for punitive damages.

REQUEST FOR PRODUCTION NO. 41: Please produce copies of all financial statements, statements of net worth, or other similar documents that describe your financial condition that were prepared between January 1, 2022, and the present.

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide all financial statements, statements of net worth, or other similar documents that describe his financial condition between January 1, 2022, and the present, which he was required to provide.

Because Ammon Bundy refused to provide his financial documents, you shall assume that Bundy has financial documents, including statements of his net worth which support Plaintiffs' claims for punitive damages.

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

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide evidence showing the financial transactions for the People's Rights Network from January 1, 2019 to the present, which he was required to provide. You shall presume that there is evidence of financial transactions between Ammon Bundy and PRN and that the evidence supports Plaintiffs' claims against Bundy for compensatory and punitive damages.

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

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide evidence showing the financial transactions between Diego Rodriguez and himself, which he was required to provide. You shall assume that there is evidence of transactions between Bundy and Diego Rodriguez and that the evidence supports Plaintiffs' allegations, claims for compensatory damages, and claims for punitive damages.

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

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide evidence showing the financial transactions between Ammon Bundy for Governor and himself, which he was required to provide. Because Ammon Bundy refused to provide this evidence, you shall

assume that Ammon Bundy has documents showing financial transactions with Ammon Bundy for Governor, and that such evidence supports Plaintiffs' claims for compensatory damages and claims for punitive damages.

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

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide documents relating to his entity, Dono Custos, Inc. Because Ammon Bundy refused to provide this evidence, you shall assume that Ammon Bundy has documents relating to Dono Custos, Inc., and that such evidence supports Plaintiffs' claims for compensatory damages and claims for punitive damages.

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

PROPOSED ADVERSE INFERENCE: Ammon Bundy refused to provide documents relating to his entity, Abish husbandi Inc. Because Ammon Bundy refused to provide this evidence, you shall assume that Ammon Bundy has documents relating to Abish husbandi Inc., and that such evidence supports Plaintiffs' claims for compensatory damages and claims for punitive damages.

B. PROPOSED INFERENCES AGAINST AMMON BUNDY FOR GOVERNOR²

INTERROGATORY NO. 8: Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not

² Stidham Decl. at Exs. B, C, G (attaching referenced discovery requests).

limited to, communications between You and any Defendant relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and any Defendant regarding the Plaintiffs, and communications between You and any Defendant relating to DHW's intervention involving the Infant.

PROPOSED ADVERSE INFERENCE: Ammon Bundy for Governor refused to provide evidence showing its communications with the other Defendants that relate to the lawsuit, which it was required to provide. Because Ammon Bundy for Governor refused to provide the evidence, you shall assume that communications with the other Defendants that relate to the lawsuit exist, and that the communications support Plaintiffs' claims for compensatory damages and punitive damages.

C. PROPOSED INFERENCES AGAINST PEOPLE'S RIGHTS NETWORK³

REQUEST FOR PRODUCTION NO. 14: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You and any Defendant in this lawsuit, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint.

PROPOSED ADVERSE INFERENCE: People's Rights Network refused to provide evidence showing its communications with the other Defendants that relate to this lawsuit, which it was required to provide. Because People's Rights Network refused to provide the evidence, you shall assume that communications between PRN and the other Defendants exist and those communications support Plaintiffs' claims for compensatory and punitive damages.

³ Stidham Decl. at Ex. F (attaching referenced discovery requests).

REQUEST FOR PRODUCTION NO. 22: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations.

PROPOSED ADVERSE INFERENCE: People's Rights Network refused to provide evidence showing it asked others to call, text, email, protest, disrupt or interfere with St. Luke's operations, which it was required to provide. Because People's Rights Network refused to provide the evidence, you shall assume that People's Rights Network asked others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations, and that such evidence supports Plaintiffs' claims for compensatory and punitive damages.

REQUEST FOR PRODUCTION NO. 23: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, dox, pressure, or influence any Plaintiff in this lawsuit.

PROPOSED ADVERSE INFERENCE: People's Rights Network refused to provide evidence showing it asked others to others to call, text, email, protest, dox, pressure, or influence the Plaintiffs, which it was required to provide. Because People's Rights Network refused to provide the evidence, you shall assume People's Rights Network asked others to call, text, email, protest, dox, pressure, or influence the Plaintiffs, and that such evidence supports Plaintiffs' claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 28: Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle,

Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

PROPOSED ADVERSE INFERENCE: People's Rights Network refused to provide evidence showing transfers of money between itself and any Defendants or any entity owned or controlled by any Defendants, which it was required to provide. Because People's Rights Network refused to provide the evidence, you shall assume that money was transferred between PRN and the other Defendants and that the transfers support Plaintiffs' claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 31: Please produce all financial documents relating to money or other things of value You collected from January 1, 2020, to present, including, but not limited to, all balance sheets, profit and loss statements, and other audited or unaudited financial documents.

PROPOSED ADVERSE INFERENCE: People's Rights Network refused to provide financial documents showing the money it collected during and after the events underlying this lawsuit, which it was required to provide. Because People's Rights Network refused to provide the evidence, you shall assume that financial documents showing the money collected by PRN during and after the events underlying this lawsuit exist and that the documents support Plaintiffs' claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 32: Please produce all documents showing or reflecting the amount of money or other things of value You gave, paid, donated or otherwise transferred to any Defendant or any entity owned or controlled by any Defendant from March 1, 2020, to present.

PROPOSED ADVERSE INFERENCE: People’s Rights Network refused to provide evidence showing the amount of money it gave, paid, donated, or otherwise transferred to any Defendant or any entity owned or controlled by any Defendant during and after the events underlying this lawsuit, which it was required to provide. Because People’s Rights Network refused to provide the evidence, you shall assume that People’s Rights Network gave, paid, donated, or otherwise transferred money to the other Defendants (or to the entities owned by the other Defendants), and that such money transfers support Plaintiffs’ claims for compensatory damages or punitive damages.

D. PROPOSED INFERENCES AGAINST DIEGO RODRIGUEZ⁴

INTERROGATORY NO. 35: Please identify all sources and amounts of Income for You from January 1, 2022 to present by stating the name, address, and contact information for each source.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to identify his sources of income from January 1, 2022, to present, which he was required to identify. Because Diego Rodriguez refused to identify his sources of income, you shall assume that Diego Rodriguez has various sources of income, and that such evidence relating to those sources of income support Plaintiffs’ claims for compensatory damages and punitive damages.

INTERROGATORY NO. 37: State Your current Net Worth.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide his current net worth, which he was required to provide. Because Diego Rodriguez refused to

⁴ Stidham Decl. at Exs. H, J (attaching referenced discovery requests).

identify his net worth, you shall assume that Diego Rodriguez's net worth supports Plaintiffs' claims for punitive damages.

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

Court Order. In its Feb. 8, 2023, Order Compelling Defendant Rodriguez to Respond to Discovery ("February Order"), the Court ordered Mr. Rodriguez to "produce all emails and text messages between Diego Rodriguez and Ammon Bundy that relate to this lawsuit or the underlying subject matter in this case as requested in Request for Production 16. He didn't comply.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide emails and text messages that he exchanged with Ammon Bundy, which he was required to provide. Because Diego Rodriguez refused to provide the evidence, you shall assume that Diego Rodriguez communicated with Ammon Bundy about the events underlying this lawsuit, and that such communications support Plaintiffs' claims for compensatory damages and punitive damages.

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

Court Order. In its February Order, the Court ordered Mr. Rodriguez to “supplement Request for Production 22 to produce all contracts and business relationships between the parties in this case including those specifically named in Request for Production 22 or others that exist.” He didn’t comply.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide evidence showing contracts or business relationships between himself (or any of the entities he owns or controls) and Defendant Ammon Bundy (including People’s Rights Network and Abish-Husbandi, Inc.), which he was required to provide. You shall assume that there are contracts or business relationships between Diego Rodriguez (or any of the entities he owns or controls) and Defendant Ammon Bundy (including People’s Rights Network and Abish-Husbandi, Inc.) and that those contracts and relationships support Plaintiffs’ claims for compensatory damages and punitive damages.

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

Court Order. In its February Order, the Court ordered Mr. Rodriguez to “produce tax returns responsive to Request for Production 23 but subject to a confidentiality order that restricts the disclosure of any tax returns marked confidential to being viewed only by the attorneys assigned to this case and filed as a sealed exhibit subject to Idaho Court Administrative Rule 32.” He didn’t comply.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide his state and federal tax returns for the years 2021 and 2022, which he was required to provide. You shall assume that Diego Rodriguez’s tax returns for the years 2021 and 2022 support Plaintiffs’ claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 48: Please produce copies of all financial statements, statements of net worth, or other similar documents that describe your financial condition that were prepared between January 1, 2022, and the present.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide all financial statements, statements of net worth, or other similar documents that describe his financial condition between January 1, 2022, and the present, which he was required to provide. Because Diego Rodriguez refused to provide his financial statements, you shall assume that Diego Rodriguez has financial statements of his net worth and that those statements support Plaintiffs' claims for compensatory damages and punitive damages.

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

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to produce evidence relating to his assets, which he was required to provide. Because Diego Rodriguez refused to provide evidence of his assets, you shall assume that there is evidence of Diego Rodriguez's assets, and that such evidence supports Plaintiffs' claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 53: Produce all Documents relating to any real estate transactions that you have been involved in since January 1, 2022 to the present.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide evidence of real estate transactions involving his entity, Freedom Tabernacle, Incorporated, which he was required to provide. Because Diego Rodriguez refused to provide this evidence, you shall assume there is evidence of financial transactions between Diego Rodriguez and Freedom

Tabernacle, Inc. and that the evidence supports Plaintiffs' claims for compensatory and punitive damages.

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

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide evidence showing the financial transactions between Ammon Bundy and himself, which he was required to provide. Because Diego Rodriguez refused to provide this evidence, you shall assume that there is evidence of financial transactions between Bundy and Diego Rodriguez and that the evidence supports Plaintiffs' claims for compensatory damages and punitive damages.

REQUEST FOR PRODUCTION NO. 56: Produce all documents relating to financial transactions involving You and the Ammon Bundy for Governor Campaign between January 1, 2019 and present.

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide evidence showing the financial transactions between Ammon Bundy for Governor and himself, which he was required to provide. You shall assume that evidence exists of financial transactions between Diego Rodriguez and the Bundy for Governor Campaign and that the evidence supports Plaintiffs' claims for compensatory damages and for punitive damages.

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

PROPOSED ADVERSE INFERENCE: Diego Rodriguez refused to provide evidence showing the financial transactions between his entity, Power Marketing Agency, LLC, and himself, which he was required to provide. Because Diego Rodriguez refused to provide this evidence, you shall assume that evidence of transactions involving Power Marketing Agency,

LLC exists and that the evidence supports Plaintiffs' claims for compensatory damages and punitive damages.

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 7/7/23
- 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 7/7/23
- 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 7/7/23
- 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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