

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Alexandra S. Grande (ISB #9566)
Zachery J. McCraney (ISB #11552)
Anne E. Henderson (ISB #10412)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
asgrande@hollandhart.com
zjmccraney@hollandhart.com
aehenderson@hollandhart.com

Counsel for Plaintiffs

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

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

Plaintiffs,

vs.

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

Defendants.

Case No. CV01-22-06789

**THIRD DECLARATION OF
ZACHERY J. MCCRANEY TO
ESTABLISH FOUNDATION**

I, Zachery J. McCraney, declare and state as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. This is the third declaration of Zachery McCraney that Plaintiffs have filed in this case. On June 28, 2023, Plaintiffs filed a Declaration of Zachery J. McCraney to Establish Foundation (“First McCraney Decl.”). Plaintiffs filed a Second Declaration of Zachery McCraney to Establish Foundation (“Second McCraney Decl.”) on July 6, 2023. Like the other declarations, Plaintiffs file this declaration to expedite the process, which Plaintiffs believe would have been more efficient had Defendants participated in the Court process.

EVIDENCE RECEIVED BY HOLLAND & HART.

1. Trial Exhibit 720 is a true, correct, and accurate copy of June 16, 2023, Certified Order signed by Magistrate Court Judge Andrew Ellis releasing and unsealing the register of actions in Case No. CV01-22-03645 and allowing testimony regarding laws, processes, procedural rules, and administrative steps followed generally in Idaho CPA proceedings and specifically in Case No. CV01-22-03645.

2. Trial Exhibit 721 is a true, correct, and accurate copy of the Case Summary for Ada County Magistrate Court Case No. CV01-22-03645, which was released to Holland & Hart on June 21, 2023, through a sealed records request pursuant to the above-referenced order.

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

DATED: July 13, 2023.

/s/ Zachery J. McCraney
Zachery J. McCraney

CERTIFICATE OF SERVICE

I hereby certify that on this 13th 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