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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

SECOND SPECIAL VERDICT FORM

We the jury, duly impaneled and sworn in the above matter, answer the second set of special interrogatories as follows:

If you awarded damages under Question 1 and Question 2 for the same Plaintiff, from the same Defendant, please answer Question 9.

Question No. 9: Defamation and Invasion of Privacy/False Light. Did you award damages under Question 1 for different conduct than the conduct for which you awarded damages under Question 2?

a. Defendant Ammon Bundy:

- i. Chris Roth Yes No
- ii. Natasha Erickson Yes No
- iii. Tracy Jungman Yes No

b. Defendant People's Rights Network:

- i. Chris Roth Yes No
- ii. Natasha Erickson Yes No
- iii. Tracy Jungman Yes No

c. Defendant Ammon Bundy for Governor:

- i. Chris Roth Yes No
- ii. Natasha Erickson Yes No
- iii. Tracy Jungman Yes No

d. Defendant Diego Rodriguez:

- i. Chris Roth Yes No

- ii. Natasha Erickson Yes No
- iii. Tracy Jungman Yes No

e. Defendant Freedom Man Press, LLC:

- i. Chris Roth Yes No
- ii. Natasha Erickson Yes No
- iii. Tracy Jungman Yes No

f. Defendant Freedom Man PAC:

- i. Chris Roth Yes No
- ii. Natasha Erickson Yes No
- iii. Tracy Jungman Yes No

Question No. 2: Invasion of Privacy/False Light. It has been established that Defendants Ammon Bundy, the People’s Rights Network, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press, LLC, and Freedom Man PAC each placed Chris Roth, Natasha Erickson, and Tracy Jungman in a false light in the public eye by publicly disclosing some falsity or fiction concerning Chris Roth, Natasha Erickson, and Tracy Jungman. Please indicate the amount of compensatory damages, if any, you find were proximately caused by each Defendant as to each Plaintiff below.

Answer to Question No. 2: Yes No

If your Answer to Question No. 2 was yes, indicate the amount of damages you find attributable to the harm caused by defamation of the Plaintiffs, as to each Defendant for each Plaintiff.

a. Defendant Ammon Bundy caused compensatory damages in the amount of:

- i. To Plaintiff Chris Roth:
 - \$ _____ Harm to privacy interest
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ **Total**

ii. To Plaintiff Natasha Erickson:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

b. Defendant People’s Rights Network caused compensatory damages in the amount of:

i. To Plaintiff Chris Roth:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

ii. To Plaintiff Natasha Erickson:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

c. Defendant Ammon Bundy for Governor caused compensatory damages in the amount of:

i. To Plaintiff Chris Roth:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

ii. To Plaintiff Natasha Erickson:
\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:
\$ _____ Harm to privacy interest

\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

d. Defendant Diego Rodriguez caused compensatory damages in the amount of:

i. To Plaintiff Chris Roth:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

ii. To Plaintiff Natasha Erickson:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

e. Defendant Freedom Man Press, LLC caused compensatory damages in the amount of:

i. To Plaintiff Chris Roth:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

ii. To Plaintiff Natasha Erickson:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

f. Defendant Freedom Man PAC caused compensatory damages in the amount of:

i. To Plaintiff Chris Roth:

\$ _____ Harm to privacy interest
\$ _____ Emotional distress and/or bodily harm
\$ _____ **Total**

- ii. To Plaintiff Natasha Erickson:
 - \$ _____ Harm to privacy interest
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ **Total**

- iii. To Plaintiff Tracy Jungman:
 - \$ _____ Harm to privacy interest
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ **Total**

Question No. 3: Intentional Infliction of Emotional Distress. It has been established that Defendants Ammon Bundy, the People’s Rights Network, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press, LLC, and Freedom Man PAC each engaged in intentional infliction of emotional distress against Chris Roth, Natasha Erickson, and Tracy Jungman. Please indicate the amount of compensatory damages, if any, you find were proximately caused by each Defendant as to each Plaintiff below.

a. Defendant Ammon Bundy caused compensatory damages in the amount of:

- i. To Plaintiff Chris Roth:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- ii. To Plaintiff Natasha Erickson:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- iii. To Plaintiff Tracy Jungman:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

b. Defendant People’s Rights Network caused compensatory damages in the amount of:

- i. To Plaintiff Chris Roth:

\$ _____ Emotional distress and/or bodily harm
\$ _____ Loss/impairment of earning capacity, reputational harm
\$ _____ Reasonable medical and other expenses
\$ _____ Harm to property or business
\$ _____ **Total**

ii. To Plaintiff Natasha Erickson:

\$ _____ Emotional distress and/or bodily harm
\$ _____ Loss/impairment of earning capacity, reputational harm
\$ _____ Reasonable medical and other expenses
\$ _____ Harm to property or business
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:

\$ _____ Emotional distress and/or bodily harm
\$ _____ Loss/impairment of earning capacity, reputational harm
\$ _____ Reasonable medical and other expenses
\$ _____ Harm to property or business
\$ _____ **Total**

c. Defendant Ammon Bundy for Governor caused compensatory damages in the amount of:

i. To Plaintiff Chris Roth:

\$ _____ Emotional distress and/or bodily harm
\$ _____ Loss/impairment of earning capacity, reputational harm
\$ _____ Reasonable medical and other expenses
\$ _____ Harm to property or business
\$ _____ **Total**

ii. To Plaintiff Natasha Erickson:

\$ _____ Emotional distress and/or bodily harm
\$ _____ Loss/impairment of earning capacity, reputational harm
\$ _____ Reasonable medical and other expenses
\$ _____ Harm to property or business
\$ _____ **Total**

iii. To Plaintiff Tracy Jungman:

\$ _____ Emotional distress and/or bodily harm
\$ _____ Loss/impairment of earning capacity, reputational harm
\$ _____ Reasonable medical and other expenses
\$ _____ Harm to property or business
\$ _____ **Total**

d. Defendant Diego Rodriguez caused compensatory damages in the amount of:

- i. To Plaintiff Chris Roth:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- ii. To Plaintiff Natasha Erickson:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- iii. To Plaintiff Tracy Jungman:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

e. Defendant Freedom Man Press, LLC caused compensatory damages in the amount of:

- i. To Plaintiff Chris Roth:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- ii. To Plaintiff Natasha Erickson:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- iii. To Plaintiff Tracy Jungman:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

f. Defendant Freedom Man PAC caused compensatory damages in the amount of:

- i. To Plaintiff Chris Roth:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- ii. To Plaintiff Natasha Erickson:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

- iii. To Plaintiff Tracy Jungman:
 - \$ _____ Emotional distress and/or bodily harm
 - \$ _____ Loss/impairment of earning capacity, reputational harm
 - \$ _____ Reasonable medical and other expenses
 - \$ _____ Harm to property or business
 - \$ _____ **Total**

Question 4: Trespass. It has been established that Defendants Ammon Bundy and Diego Rodriguez trespassed on the property of St. Luke's. Please indicate the amount of compensatory damages, if any, you find were proximately caused by each Defendant below.

a. Defendant Ammon Bundy caused compensatory damages in the amount of:

- i. To St. Luke's: \$ _____

b. Defendant Diego Rodriguez caused compensatory damages in the amount of:

- i. To St. Luke's: \$ _____

Question 5: Idaho Charitable Solicitation Act (Part 1). It has been established that Defendants Diego Rodriguez and Freedom Man Press, LLC violated the Idaho Charitable Solicitation Act. Do you find that Plaintiffs suffered actual damages as a result of the violation?

a. Defendant Diego Rodriguez caused actual damages to:

- i. St. Luke's: Yes No

- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

b. Defendant Freedom Man Press, LLC caused actual damages to:

- i. St. Luke’s: Yes No
- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

Question 6: Idaho Charitable Solicitation Act (Part 2). If you answered “Yes” above, please answer Question 6 with respect to that Defendant. As to any Defendant to which you answered “No,” skip Question 6.

- a. Defendant Diego Rodriguez wrongfully obtained: \$ _____
- b. Defendant Freedom Man Press wrongfully obtained: \$ _____

Question 7: Punitive Damages (Part 1). Do you find that any Defendant acted maliciously, fraudulently, oppressively, or outrageously; and in manner that is an extreme deviation from reasonable standards of conduct; proximately causing injury to any Plaintiff? Please answer with respect to each Defendant and Plaintiff below.

a. Defendant Ammon Bundy:

- i. St. Luke’s: Yes No
- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

b. Defendant People’s Rights Network:

- i. St. Luke’s: Yes No

- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

c. Defendant Ammon Bundy for Governor:

- i. St. Luke's: Yes No
- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

d. Defendant Diego Rodriguez:

- i. St. Luke's: Yes No
- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

e. Defendant Freedom Man Press, LLC:

- i. St. Luke's: Yes No
- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

f. Defendant Freedom Man PAC:

- i. St. Luke's: Yes No
- ii. Chris Roth Yes No
- iii. Natasha Erickson Yes No
- iv. Tracy Jungman Yes No

Question 7: Punitive Damages (Part 2). If you answered “Yes” above, please answer Question 7 for the Defendant/Plaintiff combination for which you answered “Yes.” As to any Defendant to which you answered “No,” skip Question 7. Please indicate the amount of punitive damages, if any.

a. Defendant Ammon Bundy:

- i. St. Luke’s: \$ _____
- ii. Chris Roth \$ _____
- iii. Natasha Erickson \$ _____
- iv. Tracy Jungman \$ _____

b. Defendant People’s Rights Network:

- i. St. Luke’s: \$ _____
- ii. Chris Roth \$ _____
- iii. Natasha Erickson \$ _____
- iv. Tracy Jungman \$ _____

c. Defendant Ammon Bundy for Governor:

- i. St. Luke’s: \$ _____
- ii. Chris Roth \$ _____
- iii. Natasha Erickson \$ _____
- iv. Tracy Jungman \$ _____

d. Defendant Diego Rodriguez:

- i. St. Luke’s: \$ _____
- ii. Chris Roth \$ _____
- iii. Natasha Erickson \$ _____
- iv. Tracy Jungman \$ _____

e. Defendant Freedom Man Press, LLC:

- i. St. Luke’s: \$ _____
- ii. Chris Roth \$ _____
- iii. Natasha Erickson \$ _____
- iv. Tracy Jungman \$ _____

f. Defendant Freedom Man PAC:

- i. St. Luke’s: \$ _____
- ii. Chris Roth \$ _____
- iii. Natasha Erickson \$ _____
- iv. Tracy Jungman \$ _____

DATED: July 17, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Anne E. Henderson

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 18th 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