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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

THIRD SPECIAL VERDICT FORM

We the jury, duly impaneled and sworn in the above matter, answer the special interrogatories as set forth below.

To reach a verdict, the jury must come to a consensus in which at least nine of the twelve jury members agree.

Question No. 1: Defamation. 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 made defamatory statements about each of the Plaintiffs: St. Luke's, 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.

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

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

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

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

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

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

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

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

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

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

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

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

Did you come to your conclusion as to Question No. 1 with a consensus of nine or more jurors?

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.

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____

ii. To Plaintiff Natasha Erickson: \$ _____

iii. To Plaintiff Tracy Jungman: \$ _____

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

i. To Plaintiff Chris Roth: \$ _____

ii. To Plaintiff Natasha Erickson: \$ _____

iii. To Plaintiff Tracy Jungman: \$ _____

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

i. To Plaintiff Chris Roth: \$ _____

ii. To Plaintiff Natasha Erickson: \$ _____

iii. To Plaintiff Tracy Jungman: \$ _____

Did you come to your conclusion as to Question No. 2 with a consensus of nine or more jurors?

Yes No

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: \$ _____

ii. To Plaintiff Natasha Erickson: \$ _____

iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

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

- i. To Plaintiff Chris Roth: \$ _____
 - ii. To Plaintiff Natasha Erickson: \$ _____
 - iii. To Plaintiff Tracy Jungman: \$ _____
- \$ _____ **Total**

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

- i. To Plaintiff Chris Roth: \$ _____
- ii. To Plaintiff Natasha Erickson: \$ _____
- iii. To Plaintiff Tracy Jungman: \$ _____

Did you come to your conclusion as to Question No. 3 with a consensus of nine or more jurors?

Yes No

Question 4: Trespass (Boise). It has been established that Defendants Ammon Bundy and Diego Rodriguez trespassed on the property of St. Luke's *Boise*. 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: \$ _____

Did you come to your conclusion as to Question No. 4 with a consensus of nine or more jurors?

Yes No

Question 5: Trespass (Meridian). It has been established that Defendant Ammon Bundy trespassed on the property of St. Luke's Meridian. Please indicate the amount of compensatory damages, if any, you find were proximately caused by Mr. Bundy.

To St. Luke's: \$ _____

Did you come to your conclusion as to Question No. 5 with a consensus of nine or more jurors?

Yes No

Question 6: 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	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ii.	Chris Roth	<input type="checkbox"/> Yes	<input type="checkbox"/> No
iii.	Natasha Erickson	<input type="checkbox"/> Yes	<input type="checkbox"/> No
iv.	Tracy Jungman	<input type="checkbox"/> Yes	<input type="checkbox"/> 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

Did you come to your conclusion as to Question No. 6 with a consensus of nine or more jurors?

- Yes No

If you answered "Yes" to Question 6, please answer Question 7 with respect to that Defendant. As to any Defendant to which you answered "No," skip Question 7.

Question 7: Idaho Charitable Solicitation Act (Part 2). Please state the amount wrongfully obtained, if any.

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

Did you come to your conclusion as to Question No. 6 with a consensus of nine or more jurors?

- Yes No

Question 8: Punitive Damages (Part 1). It has been established that each Defendant's conduct as to each Plaintiff was malicious, fraudulent, oppressive, or outrageous. If you have awarded compensatory damages under Questions 1-5 and/or 7 above, please indicate the amount of punitive damages for each Defendant against whom you awarded damages under Questions 1-5 and/or 7, 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 \$ _____

Did you come to your conclusion as to Question No. 8 with a consensus of nine or more jurors?

Yes No

You have completed the special interrogatories.

DATED: July 19, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Alexandra S. Grande

Zachery J. McCraney

Anne E. Henderson

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 19th 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