

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE

STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

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Fourth Judicial District, Ada County
Trent Tripple, Clerk of the Court
By: Deputy Clerk - Nelson, Ric

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

SPECIAL VERDICT FORM

We, the jury, answer the special verdict questions as set forth below.

To reach a verdict on a question, at least nine of the twelve jury members must 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: \$ 3,500,000. [Number of Jurors that agree 10]
- ii. To Plaintiff Chris Roth: \$ 125,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Natasha Erickson: \$ 450,000. [Number of Jurors that agree 11]
- iv. To Plaintiff Tracy Jungman: \$ 225,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff St. Luke's: \$ 2,800,000. [Number of Jurors that agree 10]
- ii. To Plaintiff Chris Roth: \$ 100,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Natasha Erickson: \$ 300,000. [Number of Jurors that agree 11]
- iv. To Plaintiff Tracy Jungman: \$ 300,000 [Number of Jurors that agree 11]

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

- i. To Plaintiff St. Luke's: \$ 700,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Chris Roth: \$ 25,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Natasha Erickson: \$ 150,000. [Number of Jurors that agree 11]
- iv. To Plaintiff Tracy Jungman: \$ 75,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff St. Luke's: \$ 3,500,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Chris Roth: \$ 125,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Natasha Erickson: \$ 225,000. [Number of Jurors that agree 11]
- iv. To Plaintiff Tracy Jungman: \$ 525,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff St. Luke's: \$ 2,800,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Chris Roth: \$ 100,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Natasha Erickson: \$ 300,000. [Number of Jurors that agree 11]
- iv. To Plaintiff Tracy Jungman: \$ 300,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff St. Luke's: \$ 700,000 [Number of Jurors that agree 11]
- ii. To Plaintiff Chris Roth: \$ 25,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Natasha Erickson: \$ 75,000. [Number of Jurors that agree 11]
- iv. To Plaintiff Tracy Jungman: \$ 75,000. [Number of Jurors that agree 11]

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: \$ 187,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 750,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 375,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff Chris Roth: \$ 150,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 500,000 [Number of Jurors that agree 11]

- iii. To Plaintiff Tracy Jungman: \$ 500,000. [Number of Jurors that agree 11]
- c. Defendant Ammon Bundy for Governor caused compensatory damages in the amount of:**
- i. To Plaintiff Chris Roth: \$ 37,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 250,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 125,000. [Number of Jurors that agree 11]
- d. Defendant Diego Rodriguez caused compensatory damages in the amount of:**
- i. To Plaintiff Chris Roth: \$ 187,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 375,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 875,000. [Number of Jurors that agree 11]
- e. Defendant Freedom Man Press LLC caused compensatory damages in the amount of:**
- i. To Plaintiff Chris Roth: \$ 150,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 500,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 500,000. [Number of Jurors that agree 11]
- f. Defendant Freedom Man PAC caused compensatory damages in the amount of:**
- i. To Plaintiff Chris Roth: \$ 37,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 125,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 125,000. [Number of Jurors that agree 11]

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: \$ 187,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 300,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 150,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff Chris Roth: \$ 150,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 200,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 200,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff Chris Roth: \$ 37,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 100,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 50,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff Chris Roth: \$ 187,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 150,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 350,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff Chris Roth: \$ 150,000. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 200,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 200,000. [Number of Jurors that agree 11]

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

- i. To Plaintiff Chris Roth: \$ 37,500. [Number of Jurors that agree 11]
- ii. To Plaintiff Natasha Erickson: \$ 50,000. [Number of Jurors that agree 11]
- iii. To Plaintiff Tracy Jungman: \$ 50,000. [Number of Jurors that agree 11]

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 Defendants Bundy and Rodriguez below.

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

- i. To St. Luke's: \$ 0 [Number of Jurors that agree 9]

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

- i. To St. Luke's: \$ 0 [Number of Jurors that agree 9]

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 Defendant Bundy.

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

- i. To St. Luke's: \$ 0 [Number of Jurors that agree 9]

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 injury or harm as a result of the violation?

a. Defendant Diego Rodriguez's violation caused injury or harm to:

- i. St. Luke's Yes No [Number of Jurors that agree 12]
- ii. Chris Roth Yes No [Number of Jurors that agree 12]
- iii. Natasha Erickson Yes No [Number of Jurors that agree 12]
- iv. Tracy Jungman Yes No [Number of Jurors that agree 12]

b. Defendant Freedom Man Press LLC's violation caused injury or harm to:

- i. St. Luke's Yes No [Number of Jurors that agree 12]
- ii. Chris Roth Yes No [Number of Jurors that agree 12]
- iii. Natasha Erickson Yes No [Number of Jurors that agree 12]
- iv. Tracy Jungman Yes No [Number of Jurors that agree 12]

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 by the Defendants violation of the Idaho Charitable Solicitation Act, if any.

- a. Defendant Diego Rodriguez: \$250,000. [Number of Jurors that agree 11]
- b. Defendant Freedom Man Press LLC: \$250,000. [Number of Jurors that agree 11]

Question 8: Punitive Damages (Part 1). If you have awarded compensatory damages under Questions 1-5 and/or 7 above, please indicate the amount of punitive damages, if any, to be awarded to a Plaintiff against each Defendant. If you find a Defendant's conduct as to a Plaintiff was malicious, fraudulent, oppressive, or outrageous you may award punitive damages.

a. Defendant Ammon Bundy:

- i. St. Luke's \$ 1,250,000. [Number of Jurors that agree 9]
- ii. Chris Roth \$ 1,750,000. [Number of Jurors that agree 9]
- iii. Natasha Erickson \$ 2,100,000. [Number of Jurors that agree 9]
- iv. Tracy Jungman \$ 1,050,000. [Number of Jurors that agree 9]

b. Defendant People's Rights Network:

- i. St. Luke's \$ 1,000,000. [Number of Jurors that agree 9]
- ii. Chris Roth \$ 1,400,000. [Number of Jurors that agree 9]
- iii. Natasha Erickson \$ 1,400,000. [Number of Jurors that agree 9]
- iv. Tracy Jungman \$ 1,400,000. [Number of Jurors that agree 9]

c. Defendant Ammon Bundy for Governor:

- i. St. Luke's \$ 250,000. [Number of Jurors that agree 9]
- ii. Chris Roth \$ 350,000. [Number of Jurors that agree 9]
- iii. Natasha Erickson \$ 700,000. [Number of Jurors that agree 9]
- iv. Tracy Jungman \$ 350,000. [Number of Jurors that agree 9]

d. Defendant Diego Rodriguez:

- i. St. Luke's \$ 1,250,000. [Number of Jurors that agree 9]
- ii. Chris Roth \$ 1,750,000. [Number of Jurors that agree 9]
- iii. Natasha Erickson \$ 1,050,000. [Number of Jurors that agree 9]
- iv. Tracy Jungman \$ 2,450,000. [Number of Jurors that agree 9]

e. Defendant Freedom Man Press LLC:

- i. St. Luke's \$ 1,000,000. [Number of Jurors that agree 9]

- ii. Chris Roth \$ 1,400,000. [Number of Jurors that agree 9]
- iii. Natasha Erickson \$ 1,400,000. [Number of Jurors that agree 9]
- iv. Tracy Jungman \$ 1,400,000. [Number of Jurors that agree 9]

f. Defendant Freedom Man PAC:

- i. St. Luke's \$ 250,000. [Number of Jurors that agree 9]
- ii. Chris Roth \$ 350,000. [Number of Jurors that agree 9]
- iii. Natasha Erickson \$ 350,000. [Number of Jurors that agree 9]
- iv. Tracy Jungman \$ 350,000. [Number of Jurors that agree 9]

Question 9: Punitive Damages (Part 2). Did the conduct underlying each claim for which you awarded compensatory damages independently support the amount of punitive damages?

- a. Ammon Bundy Yes No [Number of Jurors that agree 12]
- b. People's Rights Network Yes No [Number of Jurors that agree 12]
- c. Ammon Bundy for Governor Yes No [Number of Jurors that agree 12]
- d. Diego Rodriguez Yes No [Number of Jurors that agree 12]
- e. Freedom Man Press LLC Yes No [Number of Jurors that agree 12]
- f. Freedom Man PAC Yes No [Number of Jurors that agree 12]

If you answered "Yes" as to all Defendants in Question 9, please skip Question 10. If you answered "No" as to any Defendant in Question 9, please proceed to Question 10.

Question 10: Punitive Damages (Part 3). As to any Defendant for which you answered “No” for Question 9, please write down the Count(s) and the corresponding Plaintiff(s) for which the conduct does NOT support your punitive damages award:

a. Ammon Bundy:

Count(s)	Plaintiff(s)
_____	_____
_____	_____
_____	_____
_____	_____

b. People’s Rights Network:

Count(s)	Plaintiff(s)
_____	_____
_____	_____
_____	_____
_____	_____

c. Ammon Bundy for Governor:

Count(s)	Plaintiff(s)
_____	_____
_____	_____
_____	_____
_____	_____

d. Diego Rodriguez :

Count(s)	Plaintiff(s)
_____	_____
_____	_____
_____	_____
_____	_____

e. Freedom Man Press LLC:

Count(s)	Plaintiff(s)
_____	_____
_____	_____
_____	_____
_____	_____

f. Freedom Man PAC :

Count(s)	Plaintiff(s)
_____	_____
_____	_____
_____	_____
_____	_____

Once you have completed your answers to each of the questions, have your foreperson sign the verdict form and notify the Bailiff you have reached a verdict.

Dated: 7/24/2023

Foreperson