

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

**NOTICE OF COUNTS OF CONTEMPT
AGAINST AMMON BUNDY AND
PEOPLE'S RIGHTS NETWORK**

At the contempt arraignment hearing on August 29, 2023, the Court requested Plaintiffs file a statement listing the counts of contempt set forth in the Affidavit of Jennifer M. Jensen in Support of the Renewed Motion for Contempt, filed March 30, 2023 (“Jensen Affidavit”). Plaintiffs thus provide the following list of the counts of contempt against Ammon Bundy which identifies the witness and related information contained in the Jensen Affidavit:

Counts of Contempt Against Ammon Bundy:

Count 1: Chris Roth. Violation of the preliminary injunction order for failure to timely remove webpage found at Jensen Affidavit Exhibit F pp. 1-15.

Count 2: Natasha Erickson. Violation of the protective order for failure to timely remove webpage found at Jensen Affidavit Exhibit F pp. 1-15.

Count 3: Judge Laurie Fortier. Violation of the protective order for failure to timely remove webpage found at Jensen Affidavit Exhibit F pp. 1-15.

Count 4: Nice Loufoua. Violation of the protective order for failure to timely remove webpage found at Jensen Affidavit Exhibit F pp. 1-15.

Count 5: Steve Hansen. Violation of the protective order for failure to timely remove webpage found at Jensen Affidavit Exhibit F pp. 1-15.

Count 6: Jeff Fuller. Violation of the protective order for failure to timely remove webpage found at Jensen Affidavit Exhibit F pp. 1-15.

Count 7: Steve Hansen. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 16-17.

Count 8: Jeff Fuller. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 16-17.

Count 9: Nice Loufoua. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 16-17.

Count 10: Sean King. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 20-21.

Count 11: Chris Roth. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 22-27.

Count 12: Judge Annie McDevitt. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 22-27.

Count 13: Judge Laurie Fortier. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F pp. 22-27.

Count 14: Chris Roth. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F. pp. 32-33.

Count 15: Judge Annie McDevitt. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F. pp. 34-47.

Count 16: Chris Roth. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit F. pp. 34-47.

Count 17: Chris Roth. Violation of the protective order for creating and posting the video found at Jensen Affidavit Exhibit I.

Count 18: Natasha Erickson. Violation of the protective order for creating and posting the video found at Jensen Affidavit Exhibit I.

Count 19: Natasha Erickson. Violation of the protective order for creating and posting the video found at Jensen Affidavit Exhibit K.

Count 20: Natasha Erickson. Violation of the protective order for creating and posting the video found at Jensen Affidavit Exhibit M.

Count 21: Chris Roth. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit S.

Count 22: Judge Annie McDevitt. Violation of the protective order for failure to remove webpage found at Jensen Affidavit Exhibit S.

DATED: September 5, 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 5th day of September, 2023, I caused to be filed via iCourt a true and correct copy of the foregoing. Service was made by the method and date 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 on 9/6/23
- Hand Delivered
- Overnight Mail
- Email on 9/5/23: aebundy@bundyfarms.com

Ammon Bundy
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail on 9/6/23
- Hand Delivered
- Overnight Mail
- Email on 9/5/23: aebundy@bundyfarms.com

Freedom Man PAC
Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail on 9/6/23
- 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 on 9/5/23:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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