

Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
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](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto: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 INTENT TO SERVE  
SUBPOENA DUCES TECUM TO  
CLARITY CREDIT UNION.**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena Duces Tecum substantially in the form attached hereto as "**Exhibit A**" on **Clarity Credit Union**. Plaintiffs intend to serve the Subpoena Duces Tecum on **October 27, 2023**, or as soon thereafter as service may be effectuated.

DATED this 19th day of October, 2023.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

Erik F. Stidham

Robert A. Faucher

Jennifer M. Jensen

Alexandra S. Grande

Zachery J. McCraney

Anne E. Henderson

Attorneys for Plaintiffs

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2023, I caused the foregoing to be served 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> <a href="mailto:aebundy@bundyfarms.com">aebundy@bundyfarms.com</a>
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Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/iCourt/eServe: <a href="mailto:freedommanpress@protonmail.com">freedommanpress@protonmail.com</a>
---	--

Lisa Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

*/s/ Robert A. Faucher*

\_\_\_\_\_  
Robert A. Faucher  
of Holland & Hart LLP

# **EXHIBIT A**

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Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
Alexandra S. Grande (ISB #9566)  
Zachery J. McCraney (ISB #11552)  
Anne E. Henderson (ISB #10412)  
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E-mail: [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto: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

**SUBPOENA DUCES TECUM TO  
CLARITY CREDIT UNION**

**STATE OF IDAHO TO:** Clarity Credit Union  
c/o Wendy Edwards, its Registered Agent  
18880 S. Cobalt Point Way  
100  
Clarity Credit Union – Admin  
Meridian, ID 83642

**YOU ARE COMMANDED:**

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

**PLACE:**

**DATE/TIME:**

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

**See Exhibit A.**

**PLACE:** Holland & Hart LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702

**DATE/TIME:** On or before November 28, 2023, at 5:00 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: October 27, 2023.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

Erik F. Stidham  
Robert A. Faucher  
Alexandra S. Grande  
*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of October, 2023, I caused to be 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](mailto:freedommanpress@protonmail.com)

Lisa Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

*/s/ Robert A. Faucher*

\_\_\_\_\_  
Erik F. Stidham  
OF HOLLAND & HART LLP

## EXHIBIT A

1. All records of any kind in your possession pertaining to defendant-judgment debtor Ammon Bundy generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.
2. All records of any kind in your possession pertaining to defendant-judgment debtor Ammon Bundy for Governor generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.
3. All records of any kind in your possession pertaining to defendant-judgment debtor Diego Rodriguez generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.
4. All records of any kind in your possession pertaining to defendant-judgment debtor Freedom Man Press LLC generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.
5. All records of any kind in your possession pertaining to defendant-judgment debtor Freedom Man PAC generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.
6. All records of any kind in your possession pertaining to defendant-judgment debtor People's Rights Network generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.
7. All records of any kind in your possession pertaining to Lisa Bundy, whose community property assets are subject to the judgments obtained by the Plaintiffs identified above generated on and after January 1, 2018 including without limitation signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence, paid items, returned items, cancelled items, loan agreements, and security agreements.

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