

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
jmjensen@hollandhart.com
asgrande@hollandhart.com
zmccraney@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 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 31, 2023**, or as soon thereafter as service may be effectuated.

DATED this 23rd 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 23rd 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> aebundy@bundyfarms.com
--	---

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:
---	--

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: freedommanpress@protonmail.com
---	--

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

30741701_v1

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)
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
zmccraney@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

**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 30, 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 31, 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 31st 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

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.

30741705_v1