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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

**JUDGMENT CREDITORS'
APPLICATION FOR WRITS OF
EXECUTION AS TO LISA BUNDY (ADA
COUNTY AND GEM COUNTY)**

The above-captioned Plaintiffs (collectively, the “Judgment Creditors”), by and through their attorneys, Holland & Hart LLP, respectfully represent as follows for this, their Application for Writs of Execution as to Lisa Bundy.

1. This Application is supported by the Declaration of Robert A. Faucher (“Faucher Declr.”) filed herewith.

2. On August 29, 2023, this Court entered a Default Judgment in favor of the Judgment Creditors and against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network (collectively, the “Judgment Debtors”).

3. Among other things, the Default Judgment contained a money judgment in favor of the Judgment Creditors and against the Judgment Debtors jointly and severally in the amount of **\$51,875,000**, broken down as follows:¹

Judgment Creditor	Judgment Debtors	Amount
St. Luke’s Health System, Ltd. and St. Luke’s Regional Medical Center, Ltd.	Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network	\$19,125,000
Chris Roth	Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man	\$8,500,000

¹ The Default Judgment also awarded St. Luke’s Health System, Ltd. and St. Luke’s Regional Medical Center, Ltd. \$13,443.21 for attorney fees and costs against Ammon Bundy that had been previously awarded but that remained unpaid by Ammon Bundy as of the date of the Default Judgment. The Judgment Creditors do not seek a writ of execution on that part of the judgment at this time, but they reserve all of their rights. Similarly, the Judgment Creditors do not seek to recover post-judgment interest at this time, but they reserve all of their rights.

	PAC, and People’s Rights Network	
Natasha Erickson	Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network	\$12,125,000
Tracy Jungman	Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network	\$12,125,000

4. All Judgment Debtors are jointly and severally liable for the Default Judgment. The Judgment Creditors “are entitled to have all damages owed to them to be collected jointly and severally from all Defendants.” August 29, 2023, Order on Verdict and Default Judgment.

5. The Judgment Debtors have paid nothing toward the Default Judgment as of the date hereof.

6. No stay of execution exists. The Judgment Creditors intend to collect the Default Judgment in their favor against Ammon Bundy to the extent possible.

7. The Judgment Creditors are entitled to recover their judgment against the community property assets of Lisa Bundy, who is the spouse of Judgment Debtor Ammon Bundy. Ammon and Bundy and Lisa Bundy have been married for 22 years. Faucher Declr., ¶ 9, Ex. C.

8. Regardless of whether the Default Judgment against Ammon Bundy constitutes his separate debt or a community debt, all of the community property of the marital community is liable for the Default Judgment.

9. Of course, it is axiomatic that if the Default Judgment constitutes a community debt, the community debt is subject to the Default Judgment.

10. The same is true, however, even if the Default Judgment constitutes a separate debt of Ammon Bundy. The Idaho Supreme Court “has long held that the separate debts of either spouse may be paid from community property.” *Credit Bureau of E. Idaho, Inc. v. Lecheminant*, 149 Idaho 468, 472, 235 P.3d 1188, 1193 (2010) (citations omitted).

11. Community property may be under the management or control of either spouse. See Idaho Code § 32-912 (both spouses have the right to manage and control community property). Accordingly, community property of the Bundy marital community may be under the management or control of Lisa Bundy. The community property managed by, or in the name of, Lisa Bundy is subject to the Default Judgment. For this reason, the Judgment Creditors are entitled to the issuance of a writ of execution against Lisa Bundy.

12. The Judgment Creditors hereby apply for the issuance of two writs of execution under Rule 69 of the Idaho Rules of Civil Procedure, Idaho Code §§ 11-101 to 11-107, Idaho Code § 8-507, and other applicable law against Lisa Bundy. Two proposed writs of execution as to Lisa Bundy are submitted herewith. One writ is directed to the Sheriff of Ada County and one writ is directed to the Sheriff of Gem County—each to collect the judgment in the amount identified in ¶ 3 above.

WHEREFORE, Judgment Creditors apply for the issuance of a writ of execution in the form submitted herewith.

DATED: October 29, 2023.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

Erik F. Stidham

Robert A. Faucher

Jennifer M. Jensen

Zachery J. McCraney

Anne E. Henderson

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of October, 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:

Ammon Bundy
4615 Harvest Ln.
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- U.S. Mail
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- Email/iCourt/eServe: aebundy@msn.com
aebundy@bundyfarms.com

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

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

Diego Rodriguez
1317 Edgewater Dr., #5077
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- U.S. Mail
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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

Robert A. Faucher
for HOLLAND & HART LLP