

Erik F. Stidham (ISB #5483)
Robert A. Faucher (ISB #4745)
Jennifer M. Jensen (ISB #9275)
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
rfaucher@hollandhart.com
jmjensen@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

**DECLARATION OF ROBERT A.
FAUCHER IN SUPPORT OF
JUDGMENT CREDITORS'
APPLICATIONS FOR WRITS OF
EXECUTION**

1. I, Robert A. Faucher, being first duly sworn on oath, and upon personal knowledge of the facts and circumstances recited herein, depose and state as follows:

2. I am a partner in the Boise office of the law firm of Holland & Hart LLP and am licensed to practice law in the State of Idaho. Along with my colleagues identified above, I am counsel for Plaintiffs St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, the "Judgment Creditors"). I make this Declaration on behalf of the Judgment Creditors for the purpose of obtaining the issuance of writs of execution as to all of the above-captioned defendants to the Gem County Sheriff and the Ada County Sheriff in the above-entitled matter.

3. On August 29, 2023, this Court entered a Default Judgment in favor of 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"). A true and correct copy of the Default Judgment is attached hereto as **Exhibit A**.

4. 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 **\$51,875,000.00**, broken down as follows:

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 PAC, and People’s Rights Network	\$8,500,000
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

5. The Default Judgment states that the Judgment Debtors are jointly and severally liable for the judgment. In addition, on August 29, 2023—the same day the Default Judgment was entered—this Court issued an Order on Verdict and Default Judgment. In that paper, the Court wrote that the Judgment Creditors “are entitled to have all damages owed to them to be collected jointly and severally from all Defendants.” A true and correct copy of the Order on Verdict and Default Judgment is attached hereto as **Exhibit B**.

6. As of the date of this Declaration, the Judgment Debtors have paid nothing toward the Default Judgment. Post-judgment interest has accrued on the judgment under Idaho Code § 28-22-104(2). Judgment Creditors reserve the right to recover post-judgment interest. Each of the Judgment Debtors owes more than **\$51,875,000** in respect of the Default Judgment as of the date hereof.

7. The Default Judgment and the Order on Verdict and Default Judgment have been served on the Judgment Debtors as reflected therein.

8. No stay of execution exists. Although Diego Rodriguez filed a notice of appeal, the stay that arose under Idaho Appellate Rule 13(a) in respect of that notice of appeal has

expired. The Judgment Creditors intend to collect the Default Judgment in their favor against Judgment Debtors.

9. Attached hereto as **Exhibit C** is a true and complete copy of a Response to Plaintiffs' Complaint Paragraph by Paragraph dated October 24, 2023 by Ammon Bundy and served on me that same day. In paragraph 28 of that paper, Ammon Bundy declares that he and Lisa Bundy have been married for 22 years.

10. Judgment Creditors believe the Judgment Debtors may have assets in each of Ada County and Gem County, and for that reason are seeking writs to the Sheriffs of both counties.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

DATED this 29th day of October, 2023.

/s/Robert A. Faucher

Robert A. Faucher

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.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- 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
- 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

Robert A. Faucher
OF HOLLAND & HART LLP

EXHIBIT A

**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

DEFAULT JUDGMENT

JUDGMENT IS ENTERED AS FOLLOWS:

1. Judgment is entered in favor of Plaintiffs St. Luke’s Health System, Ltd.; St. Luke’s Regional Medical Center, Ltd.; Chris Roth, Natasha D. Erickson, M.D.; and Tracy W. Jungman, N.P. against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

2. St. Luke's Health System, Ltd.'s and St. Luke's Regional Medical Center, Ltd.'s damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Nineteen Million One Hundred Twenty-Five Thousand Dollars [Fourteen Million One Hundred Twenty-Five Thousand (\$14,125,000)** in compensatory damages and **Five Million Dollars (\$5,000,000)** in punitive damages].

3. Previously Court-ordered and unpaid attorneys' fees and costs of St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. are awarded against:

- a. Defendant Ammon Bundy in the amount of **Thirteen Thousand Four Hundred Forty-Three Dollars and Twenty-One Cents (\$13,443.21)**;
- b. Defendant Ammon Bundy for Governor in the amount of **Six Thousand Eight Hundred Ninety-Five Dollars and Eighty-Six Cents (\$6,895.86)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. Defendant Freedom Man Press LLC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**;
- e. Defendant Freedom Man PAC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**; and
- f. Defendant People's Rights Network in the amount of **Eight Thousand Three Hundred Thirty-One Dollars and Ninety-Six Cents (\$8,331.96)**.

4. Chris Roth's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Eight Million Five Hundred Thousand Dollars (\$8,500,000)** [Two Million One Hundred Twenty-Five Thousand Dollars

(\$2,125,000) in compensatory damages and **Six Million Three Hundred Seventy-Five Dollars (\$6,375,000)** in punitive damages].

5. Natasha Erickson's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

6. Tracy Jungman's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

7. Interest shall accrue on all awarded damages bearing the statutory rate of 10.250% per annum until paid in full.

8. Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
 - i. The Infant was perfectly healthy when taken by Child Protective Services.
 - ii. St. Luke's made the Infant sick and infected the Infant with disease.

- iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
- iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- viii. St. Luke's reported the parents to Child Protective Services.
- ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
- x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- xi. The family was discriminated against because the Infant was not vaccinated.
 - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
 - xiii. The parents did not consent to the medical treatment provided to the Infant.
 - xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
- c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:
- <https://www.peoplesrights.org>, <https://www.votebundy.com>,
- <https://www.freedomman.org>, <https://stlukesexposed.com>,
- <https://www.facebook.com/SaveBabyCyrus/>,
- <https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>
- (handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.

e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:

<https://www.peoplesrights.org>, <https://www.votebundy.com>,

<https://www.freedomman.org>, <https://stlukeseExposed.com>,

<https://www.facebook.com/SaveBabyCyrus/>,

<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>

(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

IT IS SO ORDERED.

DATED: 8/29/2023


NANCY A. BASKIN
District Court Judge

CERTIFICATE OF SERVICE

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following persons:

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:

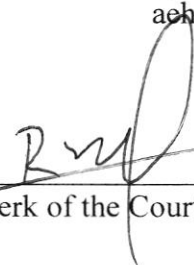
Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Erik F. Stidham
Jennifer M. Jensen
Alexandra S. Grande
Zachery J. McCraney
Anne E. Henderson
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
efstidham@hollandhart.com
jmjensen@hollandhart.com
asgrande@hollandhart.com
zmccraney@hollandhart.com
aehenderson@hollandhart.com

DATED: 8/29/23



Clerk of the Court

EXHIBIT B

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

ORDER ON VERDICT AND DEFAULT
JUDGMENT

On July 24, 2023, the jury returned a verdict on this case which was accepted by the Court and filed in this matter. The Court issued its ruling on the request for permanent injunctive relief on August 25, 2023. The Court now issues this Order to modify the jury's verdict based on Idaho Code section 6-1504(3) which limits punitive damages to the greater of \$250,000 or three times the amount of compensatory damages awarded. The Court finds based on the statute, the punitive damages to be awarded to Mr. Chris Roth must be reduced from Seven Million Dollars

Dollars (\$7,000,000) to Six Million Three Hundred and Seventy-Five Thousand Dollars (\$6,375,000). The punitive damages awarded to all other Plaintiffs are within the statutory cap and need no adjustment by the Court.

As to the liability of the individual Defendants for the damages, the Court finds based on the facts deemed admitted under the Fourth Amended Complaint due to default being entered against all Defendants and the evidence presented at trial that the Defendants conspired through agreement to together to commit: defamation against all Plaintiffs; invasion of privacy by portraying Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman in a false light; intentional infliction of emotional distress as to Mr. Roth, Dr. Erickson and NP Jungman; trespass against St. Luke's at the Boise and Meridian Hospitals; and wrongful Charitable Solicitations causing injury to each Plaintiff that Count VIII Civil Conspiracy to Commit these underlying torts has been established by a preponderance of the evidence. The jury did not have any damages to award under Count VIII so it was not submitted for their consideration on the Verdict. By virtue by the formation and operation of the conspiracy established on Count VIII in this case, the Court now finds the Plaintiffs are entitled to have all damages owed to them to be collected jointly and severally from all Defendants. The Default Judgment will reflect this finding and conclusion of law.

IT IS SO ORDERED.

DATED: 8/29/23.



NANCY A. BASKIN
District Judge

CERTIFICATE OF SERVICE

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **ORDER ON VERDICT AND DEFAULT JUDGMENT** to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following person(s):

Erik F. Stidham (X) Email
Jennifer M. Jensen
Zachery J. McCraney
Alexandra S. Grande
efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
aehenderson@hollandhart.com
Attorney for Plaintiff(s)

Diego Rodriguez (X) Email
freedommanpress@protonmail.com
Pro Se Defendant

Ammon Bundy, Ammon Bundy for Governor, (X) Mail
and People’s Rights Network
c/o Ammon Bundy
4615 Harvest Lane
Emmett ID 83617-3601
Pro Se Defendant

Ammon Bundy for Governor (X) Mail
And People’s Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett ID 83617
Pro Se Defendant

Freedom Man Press LLC and Freedom Man PAC (X) Mail
c/o Diego Rodriguez
1317 Edgewater DR #5077
Orlando, FL 32804
Pro Se Defendant

Trent Tripple
Clerk of the District Court

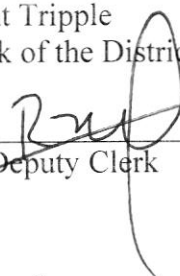
By  Deputy Clerk

EXHIBIT C

Ammon Bundy
4615 Harvest Lane xp
Emmett, Idaho 83617
208-986-6001
aebundy@msn.com

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,
Natasha Erickson, MD, Tracy Jungman,
Plaintiffs,

CASE NO. CV23-23-0551

vs.

RESPONSE TO PLAINTIFFS' COMPLAINT
PARAGRAPH BY PARAGRAPH

Ammon Bundy, Ammon Bundy,
For Governor, People's Rights, Network,
Lisa Bundy, White, Barn Enterprises, LLC,
Defendants.

Comes now Ammon Bundy responding to Plaintiffs complaint paragraph by paragraph,
complies with Idaho Civil Procedure, Rule 10.1. Response was not electronically filed, Rule
11(a). Rule 3(d)(1) does not apply as defendant did not start the civil case.

RESPONSES

Paragraph 1- Defendants Ammon Bundy, the People's Right's Network (PRN), and the Bundy for Governor Campaign are NOT morally liable for a \$52,000,000 judgment. The jury, who determined the punitive damages were lied to many times by St. Luke's witness, prompted primarily by Erik Stidham, St. Luke's lead council. Erik Stidham's proffers to the jury include; Ammon Bundy and Diego Rodriguez being "white nationalist" who desire to execute the St. Luke's Plaintiff for being "*traitors to the white race*". However, Diego Rodriguez is of Hispanic descent and his grandson Cyrus (in which the controversy was over) is also of Hispanic descent with racially mixed parents. Why would Ammon Bundy become associated and stand up for people of Hispanic and mixed-race descent if he was a "white nationalist"? Attorney, Erik Stidham, possesses the knowledge of Mr. Bundy and Cyrus family being good friends. However, he proffered these lies to the jury and the court to unethically win a judgment. Many other lies were told to the jury, lies like; Dr. Natasha Erickson did not threaten the family with CPS if they disobeyed her medical advice, or that Ammon Bundy was in a "*gun fight with law enforcement*". The jury and the court were also deceived with an audio recording of Mr. Bundy that were intentionally spliced to misrepresent his words. Many other misrepresentations were presented to the jury. This judgment will never be just.

Paragraph 2- Ammon Bundy knew the Anderson family before Baby Cyrus was born. He held Cyrus when he was only a few days old. He cares for Cyrus and his family very much. He knew of Cyrus' newly formed condition when eating solid foods. He was aware of all the efforts that his parents were making to find a good solution to his food sensitivity. Therefore, when the Meridian Police Officer ripped Cyrus from his mother's arms, Ammon Bundy knew that CPS and the Meridian Police were in the wrong and that Cyrus should not be taken from his parents. Ammon Bundy also knew that Cyrus was breastfeeding and beyond the food allergies, breastmilk was the food source that Cyrus could rely on. He was concerned for Cyrus' wellbeing when he was separated from his mother. It made no sense that Meridian Police (who claimed they were taking Cyrus for his wellbeing) would forcefully separate him from his primary source of nutrition, his mother. Also, Bundy, as a father of 6 children and 1 grandchild, is vehemently opposed to the state taking children from any loving and caring parent. If the police were really concerned for Cyrus' wellbeing, they would have kept his mother with him. It is a systematical, arrogant indoctrination that causes a person to believe the state can care for a child better than his loving parents. Only an institutionalized stooge would believe such a thing. Stooges like the people we read about in Nazi Germany. Ammon Bundy did not come to the defense of the Anderson family to "gain money" or to gain "publicity for himself". He came to the defense of the family to get Cyrus out of the hand of institutionalized stooges and back to his loving and caring parents.

Paragraph 3- St. Luke's Plaintiff, manipulated by lead Holland & Hart attorney Erik Stidham, have defamed Mr. Bundy numerous times by claiming that he accused them of "*widespread kidnapping, trafficking, sexual abuse and killing of Idaho Children*". Defendant Bundy denies ever saying such things. Bundy has challenged the Plaintiffs and other to produce evidence that he has said such thing. No evidence has been produced to this date. Diego Rodriguez has made similar claims, but Ammon Bundy has not made claims that the St. Luke's parties have engages in "*widespread kidnapping, trafficking, sexual abuse and killing of Idaho Children*". Bundy has pointed out many times that the Idaho Department of Health and Welfare receives massive federal funds when they take a child from his or her parents. Also, that St. Luke's Health System billed the state and federal governments at least \$30,000 for the 5 days of "care" they gave Cyrus. Bundy has made issue of institutions like IDHW (CPS) and St. Luke's Health System being financially motivated to take children into their "care". However, Bundy has never said or claimed that the Plaintiffs are "*engaging in widespread kidnapping, trafficking, sexual abuse, and killing of Idaho children*". These lies against Bundy have been told by St. Luke's attorneys to sway the public and the jury against him. It is a lie that the Plaintiffs continue to this day. Beyond the taking of Baby Cyrus, a few other reported incidences of St. Luke's participation in taking children from loving parents, and St. Luke's participation in sex change surgeries on children, Ammon Bundy does not have evidence of the Plaintiff engaged in the widespread harming of children.

Paragraph 4- Because Ammon Bundy & Diego Rodriguez publicly spoke out about Cyrus being taken from his parents, including St. Luke's involvement. St. Luke's parties sued them. This type of lawsuit is illegal in most states. SLAPP suites are intended to censor, intimidate, and silence

critics by burdening them with the cost of a legal defense until they abandon their criticism or opposition. The Idaho courts have allowed this lawsuit to continue, to the detriment of free speech in Idaho. The Idaho legislature has stood by as silent witnesses to this lawsuit and the chilling effect it is having on the freedom of speech. The people of Idaho should be protected when they speak out against large institutions like St. Luke's Health System.

Paragraph 5- From the beginning of this litigation Mr. Bundy considered the enormous burden that fighting this case would put on his family & finances. He deliberately decided not to appear, requiring Judge Lynn Norton to default him under the Idaho Rules of Civil Procedure, Rule 55 (a)(1). At the start of the case St. Luke's Executives were only suing for \$50,000. Therefore, rather than hiring attorneys and spending years in litigation, Bundy believed defaulting would be the least time consuming and least expensive way to mitigate the lawsuit. However, Judge Norton intentionally did not promptly default Bundy as required by the law (I.R.C.P, 55 (a)(1)). Instead, she kept the case open for nearly a year, leaving the door open wide for St. Luke's attorneys to amend the complaint 4 times, rack up around a \$700,000 legal bill, increase the punitive damages to \$52 million, and then she issued a civil warrant for Bundy's arrest. Judge Norton put a protective order on the case after St. Luke's counsel convinced her that Bundy speaking publicly about the case was somehow "threatening witnesses". Never has Bundy threatened anyone in this case. Mr. Bundy believes he has a right to freely speak about the case and about those who took part in taking the Anderson's baby. Furthermore, shortly before Judge Norton recused herself, just days after she entered the default, Bundy appeared for the first time in the case, Motioning the court to "Set Aside the Default". Judge Norton ignored his motion and moved forward with determining damages anyway.

Paragraph 6- Idaho Rules of Civil Procedure 55 (a)(1) Reads: *"When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the court MUST order entry of the party's default."* (Emphasis added) Bundy understood early in the litigation the design of the St. Luke's lawsuit, that it was not designed to win but instead to burdening him with massive legal defense costs until he abandoned his criticism or opposition of them. The fact that St. Luke's originally sued the defendant for only \$50,000 but immediately buried Bundy & Rodriguez with tens of thousands of documents, indicates that the St. Luke's Plaintiffs did not care to win, but instead intended to censor Bundy & Rodriguez by overburdening them with legal proceeding and paperwork. Bundy choose to not participant in the proceeding. He was entitled to a prompt default, a legal entitlement that was denied him by the Idaho Court in Ada County.

Paragraph 7-8- Bundy affirms the right he has to protect his asset from thieves who may or may not use the law to steal. Asset protection is a viable part of the United States economy and is a protected action that millions of U.S Citizens participate in each year. Bundy is unfamiliar with the Plaintiffs term "extremist podcasters" and therefore cannot responsibly respond to Plaintiffs complaints using that or similar terms. *Article 1, Section 1 of the Idaho State Constitution reads: INALIENABLE RIGHTS OF MAN. All men are by nature free and equal, and have certain inalienable rights, among which are enjoying and defending life and liberty;*

acquiring, possessing and protecting property; pursuing happiness and securing safety.
(Emphasis added)

Paragraph 9- Idaho law does not require a person to have permission from the state or anyone else to purchase, option, exchange or sale any interest in real property, or business opportunity for a person's own account or use. Nor does it require permission for acquisition, exchange or other disposition of any interest in real property or business opportunity by its owner or a regular employee of the owner, acting within the scope of his or her employment. IC 54-2003

Paragraph 10- (See Response 5 & 6)

Paragraph 11- (See Response 1)

Paragraph 12- Bundy has never used any service provided by St. Luke's Health System or the other Plaintiffs. He has never knowingly entered any St. Luke's building. He has never contracted with the St. Luke's Parties. Bundy assert that he owes St. Luke's nothing. Let God be the judge. (Also See Response 5)

Paragraph 13- Ammon Bundy is not an agent of the People Rights Network (PRN) and does not control any assets of the PRN. The Ammon Bundy for Governor Campaign has been terminated with Idaho Secretary of State since December of 2022 and therefore does not exist. (Also See Response 7-8)

Paragraph 14- Although Ammon Bundy did donate significantly to help start the People Rights Network (PRN), never has he *"concealed or benefited from donations intended for the PRN"*. This accusation is indicative to the narrative that Bundy is personally gaining from "defaming St. Luke's Parties". Other than getting baby Cyrus back to his parents, Bundy has not gained any temporal benefit from exposing St. Luke's participation in taking and harming baby Cyrus and his family.

Paragraph 15- (See Response 7-8)

Paragraph 16-20- St. Luke's Health System claims to be "non-profit" while they consistently overpay their top executives. For example, the CEO of St. Luke's Health System, Chris Roth, makes over \$100,000 per month for a 40-hour work week. Also, St. Luke's Executives and Board of Directors have authorized unlimited "non-profit" funds to hire teams of high paid attorney to financially destroy Ammon Bundy & Diego Rodriguez. St. Luke's, as a "not-for profit corporation" is paying all of the legal expenses for Chris Roth, Natasha Erickson and Tracy Jungman who are personally benefiting from suing Bundy & Rodriguez.

Paragraph 21- Mr. Bundy has no information on these claims.

Paragraph 22- Mr. Bundy started a fleet maintenance company when he was 21 years old by the name of Valet Fleet Service, LLC. He built that company to be one of the largest private fleet

maintenance services in Arizona, employing hundreds of people and caring for thousands of commercial vehicles. Mr. Bundy also developed a fleet maintenance software for the commercial fleet industry that is now one of the leading fleet maintenance software in North America. After moving to Idaho, Mr. Bundy sold both of these businesses and invested in commercial property. He also started and sold a transport company along with developing two additional software.

-As for Mr. Bundy's beliefs, he believes that Jesus Christ is the creator of the universe and that he created all men equally. That all men are endowed by their creator with certain rights that should not be infringed upon. Among these rights are life, liberty and the pursuit of happiness, including the right to own and control property.

-He believes that governments were instituted by men for the purpose of securing the rights their Creator has equally given them; and that God, their Creator, holds men accountable for their acts in government, both in making laws and administering them.

-Mr. Bundy believes that no government can exist in peace except laws are framed and upheld as to secure to each individual the free exercise of conscience, the right and control of property, and the protection of life.

-He believes that all men are subject to the laws of nature and the supreme laws of their Creator, and that their actions, good or evil, will be awarded or punished by that same Creator.

-He believes a man should be free to do all things as his conscience will allow, unless his actions infringe upon the rights and liberties of another person.

-Mr. Bundy does not believe that human law has a right to interfere in prescribing rules of worship to bind the consciences of men; that the civil magistrate should restrain crime, but never control conscience; should punish guilt, but never suppress freedom.

-He believes in the necessity of laws being in place for the protection of the innocent and the punishment of the guilty (those who infringe upon rights); and to those constitutional laws supporting the principles of freedom maintaining the rights belonging to all mankind, all men owe respect and deference, as without them peace and harmony would be supplanted.

-He believes that crime (the infringement of rights) should be punished according to the nature of the offense; that murder, treason, robbery, theft in all respects, should be punished according to their criminality and their tendency to evil among men, by the laws of that government in which the offense is committed.

-Mr. Bundy believes that men should appeal to the civil law for redress of wrongs and grievances, where personal abuse is inflicted or the right of property infringed, but he believes that all men are justified in defending themselves, their families, their friends, and property,

from the unlawful assaults and encroachments of all persons, including those who act in the color of law.

He believes that whenever any form of government becomes destructive to the life, liberty and property of men, it is the right of the people to alter or to abolish that government, and to institute new government, organizing its powers as to most likely effect the safety of the rights given to them by their Creator.

Mr. Bundy believes that when a long train of abuses and usurpations are pursued by those in government as a design to reduce the people under absolute despotism, it is the right of the people, it is their duty, to separate from such government, and to provide new guards for their future security.

Paragraph 23- Ammon Bundy has never generated any personal revenue from Dono Custos, PRN or the Ammon Bundy for Governor Campaign. The Ammon Bundy for Governor Campaign leased space and software services from Abish-husbondi Inc. All transaction between Abish-husbondi, Inc. and the Ammon Bundy for Governor Campaign were reported to the Idaho Secretary of State as required by law. The Idaho Secretary of State's Office has certified all the financial reports submitted by the Ammon Bundy for Governor Campaign. (See also Response 13)

Paragraph 24- Donos Costos Inc, Abish-husbondi Inc. and Ammon & Lisa Bundy maintain separated bank accounts and separate books. Donos Costos Inc, Abish-husbondi Inc serve two separate and respective purposes that do not benefit each other.

Paragraph 25- (See Response 13 & 23)

Paragraph 26- (See response 13)

Paragraph 27- Ammon Bundy has no direct control over what is posted or what is not posted on the People Right Network website outside of Idaho. The Peoples Rights Network (PRN) is not a hierarchy with one head or ruling body, it is a decentralized network of people communicating in independent autonomous geographical areas. The People Rights Network uses guidelines to help people know what the People's Rights system should be used for; What to do when someone needs assistance in defending their rights, and; What people in an area should be doing. Beyond these guidelines, that were collective created and agreed upon by people in the network, there are no rules or governing bodies. The People Rights Network has been explained as a "neighborhood watch on steroids". A person of any race, religion, gender, nationality, age, wealth, etc. can join the People Rights Network. A general belief among the network is that those governments are becoming more and more corrupted and are failing to protect the individual rights of the people. Therefore, the People's Rights Network is designed to help people communicate and at times come together to defend the equal rights of each other when needed. For example; when the state takes a baby from loving and caring parents.

Paragraph 27(a)- Ada County Judge, Lynn Norton, continually allowed the Plaintiffs to sue the Peoples Rights Network as if the network is Ammon Bundy. She intentionally avoided the obvious questions of what the People's Rights Network is legally and if the state court has jurisdiction. This essentially has put Ammon Bundy in double jeopardy. The court on record has not in any form held a hearing or otherwise sought to identify what the People's Rights Network legally is. Giving the Plaintiffs further advantage to infringe upon Mr. Bundy's rights to Life, Liberty and the Pursuit of Happiness.

Paragraph 28- Mr. Bundy loves his wife of 22 years, Lisa Marie Bundy. He maintains that she is a very intelligent, valiant, loyal and tenacious companion and that he cannot see living through eternity without.

Paragraph 29- Mr. Bundy is unaware of the corporate structure of White Barn Enterprises.

Paragraph 30-33- Mr. Bundy has no information on these claims.

Paragraph 34- It appears that Erik Stidham the Plaintiffs lead council, believes that truth is whatever he can deceive a jury or a judge into believing. There are very few factual allegations set out in the Fourth Amended Complaint in the 2022 Bundy lawsuit.

Paragraph 35- (See Response 1)

Paragraph 36- Ammon Bundy does not owe \$52,498,000 in damages to the St. Luke's Parties. The outcome of this lawsuit is an embarrassment to the Idaho Courts and undermines the Courts purpose and once good reputation to administer justice.

Paragraph 37-40- Mr. Bundy has no comment on these claims.

Paragraph 41- After considering the enormous burden that fighting this case would put on his family & finances, Ammon Bundy decided not to appear, seeking & requiring Judge Norton to default him under I.R.C.P Rule 55 (a)(1). At the beginning of the case Plaintiffs council served Bundy with thousands of courts documents multiple times a week, but only sought \$50,000 from Mr. Bundy in punitive damages. Therefore, rather than going into debt to hire expensive attorneys and spending years in litigation, Mr. Bundy believed defaulting would be the least time consuming, most peaceful and least expensive way to mitigate the lawsuit against an army of attorneys holding a blank check from a multi-billion-dollar empire. However, Judge Lynn Norton did not promptly default Bundy as required by law. Instead, she left the case open for nearly an entire year, prompting St. Luke's to amend the complaint 4 times, increase the punitive damages to \$7.5 million dollars, racking up over a \$700,000 legal bill and then issued a civil warrant for Petitioner Bundy's arrest and eventually causing a \$52 million judgment against Mr. Bundy. Judge Norton placed a gag order on Bundy's free speech. St. Luke's counsel convinced Judge Norton that Bundy's general public comments (related or unrelated to the case) were "threatening" to St. Luke's and Holland & Hart potential witnesses. Only after Petitioner Bundy was put in extreme jeopardy of losing all his property and his liberty did Judge

Norton enter default, giving St. Luke's open sights to everything Bundy owns. Shortly after entering the default agents Bundy, she recused herself from the case.

Paragraph 42- (See Response 6 & 42)

Paragraph 43-120- Ammon Bundy affirms that he sold the 4615 Property to White Barn Enterprises in good faith, well within his right to do so. Mr. Bundy finds it absurd that the Plaintiffs are claiming that; *"As a result of the actions of Ammon Bundy, the Bundy Campaign, and PRN, the St. Luke's Parties have been damaged in an amount exceeding \$100,000,000."* Especially in relation to the \$50,000 that the Plaintiffs sued for at the beginning of the 2022 lawsuit. (Complaint 111)

CONCLUSION

Defendant Bundy requests a jury trial as soon as possible.

DATED THIS DAY, the 24th of October, 2023.



Ammon Bundy,

CERTIFICATE OF SERVICE

I certify that on this day I served a copy of the attached to:

Erik F. Stidham	efstidham@hollandhart.com	<input checked="" type="checkbox"/>	EMAIL
Whitebarn Enterprises LLC	Aaron@asi247.com	<input checked="" type="checkbox"/>	EMAIL
Ada County Clerk		<input checked="" type="checkbox"/>	IN PERSON

DATED THIS DAY, the 24th of October, 2023.



Ammon Bundy