THIRD DISTRICT COURT

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Attorneys for Plaintiffs and Judgment Creditors

## IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

ST. LUKE'S HEALTH SYSTEM, LTD.
ST. LUKE'S REGIONAL MEDICAL
CENTER, LTD.,
CHRIS ROTH,
NATASHA ERICKSON, M.D., and
TRACY JUNGMAN, N.P.,

Plaintiffs,

v.

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.

NOTICE OF FILING OF CERTIFIED, EXEMPLIFIED COPY OF DEFAULT JUDGMENT ENTERED IN THE FOURTH JUDICIAL DISTRICT COURT, STATE OF IDAHO, COUNTY OF ADA

Case No. 23-6933088

PLEASE TAKE NOTICE that a Certified, Exemplified Copy of the Default Judgment dated August 29, 2023 of St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D. and Tracy Jungman, N.P. against Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network filed in the Fourth Judicial District Court, State of Idaho, County of Ada, Case No. CV01-22-06789 (the "Idaho Court"), has been filed in the THIRD JUDICIAL DISTRICT COURT OF UTAH, SALT LAKE COUNTY, under the provisions of the Utah Foreign Judgment Act (Utah Code § 78B-5-303). Under this Act, THIS JUDGMENT HAS THE SAME LEGAL FORCE AND EFFECT AS A JUDGMENT RENDERED BY THE UTAH STATE COURT.

A certified, exemplified copy of the judgment entered in the Idaho Court is attached hereto as **Exhibit 1**. There is no present stay of the judgment. *See* Declaration of Robert Faucher ("**Faucher Declaration**"), ¶ 4, attached as **Exhibit 2**. The last known addresses of the judgment debtors, as required by § 70B-5-303(1), are included in the Faucher Declaration. The address of the judgment creditor is:

St. Luke's Health System, Ltd. St. Luke's Regional Medical Center, Ltd. c/o Erik F. Stidham P.O. Box 2527 Boise, ID 83701

See Faucher Decl. ¶ 5.

Dated this 13th day of October, 2023.

HOLLAND & HART LLP

/s/ Engels Tejeda
Engels Tejeda
Attorneys for Plaintiffs and Judgment Creditors

### **CERTIFICATE OF SERVICE BY MAILING**

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COUNTY OF	SE	TT	LF	KE
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, being first duly sworn, upon oath states that he/she has mailed a copy of the Notice of Filing of Certified, Exemplified Copy of Default Judgment in the Fourth Judicial District Court, State of Idaho, County of Ada, to the judgment debtors at:

Ammon Bundy 4615 Harvest Lane Emmett, ID 83617

Ammon Bundy for Governor 4615 Harvest Lane Emmett, ID 83617

Diego Rodriguez 1317 Edgewater Drive #5077 Orlando, FL 32804

Freedom Man Press LLC 1317 Edgewater Drive #5077 Orlando, FL 32804

Freedom Man PAC Attn: Levi Anderson 3400 E. River Valley St. Meridian, ID 83646

People's Rights Network 4615 Harvest Lane Emmett, ID 83617

this  $\frac{h}{h}$  day of \_\_\_\_\_\_ 2023.

# EXHIBIT 1

### **CLERK'S CERTIFICATE OF ATTESTATION AND TRUE COPY**

St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman Plaintiff,				
vs. Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man PAC, Peoples Rights Network, Freedom Man Press LLC Defendant.	Case Number: CV01-22-06789			
Delendant				
I, Theresa Fuze, Deputy Clerk of the District Court of County of Ada, do hereby certify that the annexed copies of tLTD, St Lukes Regional Medical Center LTD, Chris Roth, Armon Bundy for Governor, Diego Rodriguez, Freedom Mahave been by me compared with the originals, and that these whole of such original records as the same appear on file and IN WITNESS WHEREOF, I have hereunto set my hand and as	Natasha Erickson, MD, Tracy Jungman vs Ammon Bundy, an PAC, Peoples Rights Network, Freedom Man Press LLC, are a correct transcript and true copies there from and of the of record in my office and in my obstody.			
THE WITHESS WHEREOF, Thave hereunto set my hand and a				
	Tripple Court of the Fourth I for the County of Ada 1			
Deput	Clock			
y Jopan,	FOR ADA COUNTRAL			
CERTIFICATE C	OF PRESIDING JUDGE			
hereby certify that Trent Tripple, and his/her deputy who signed time of signing and sealing of the same, the duly elected, of Judicial District of the State of Idaho, in and for the County of said Court; that his/her signature as it appears signed to the said certificate is the seal of said Court; and that the attestation IN WITNESS WHEREOF, I have hereunto set my hand on	qualified and acting Clerk of the District Court of the Fourth Ada; that he/she is the legal keeper of the records and seal of raid certificate of attestation is genuine; that the seal affixed to n is in due form and by the proper officer.  9/18/2023 7:03:03 PM  OF THE STATE  OF -  Baskin  IDAHO			
CERTIFICATE C	OF THE CLERK			
I, Theresa Fuze, Deputy Clerk of the District Court of the County of Ada, do hereby certify that Nancy Baskin, who signs signing of the same, the presiding Magistrate or District Judge Court of record; and that the signature of said presiding Magis is his/her genuine signature.	the Fourth Judicial District of the State of Idaho, in and for the ed the foregoing certificate, now is, and was at the time of the of said Court, duly elected and qualified; that said Court is a			
IN WITNESS WHEREOF, I have hereunto set my hand on	9/18/2023 - OF THE STATE			
Trent T Clerk of the District Judicial District, in and	Court of the Fourth ( IDAHO )			
There Tage FOR ADA COUNTRIES				
Departure Perk				

Filed: 08/29/2023 09:37:22 Fourth Judicial District, Ada County Trent Tripple, Clerk of the Court By: Deputy Clerk - Nelson, Ric

## 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].
- 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):
  - Defendant Diego Rodriguez in the amount of Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77);
  - 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:
  - Defendants must cease posting and disseminating defamatory statements
     against all Plaintiffs. Defamatory statements include:
    - 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.frcedomman.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\_medi um=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.votebundv.com.

https://www.freedomman.org. https://stlukesexposed.com,

https://www.facebook.com/SaveBabyCyrus/.

https://www.youtube.com/@RealAmmonBundv. https://twitter.com (handle @RealABundy), https://x.com (handle @RealABundy), https://www.givesendgo.com/GAZAG?utm\_source=sharelink&utm\_mcdi um=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:

STATE OF IDAHO

District Court Judge

### CERTIFICATE OF SERVICE

	1				
I, the undersigned, certify that on	8/2	9/23. I caused a true and correct			
copy of the foregoing <b>Default Judgment</b> to be forwarded with all requires charges prepaid, by					
the method(s) indicated below, in accordan	nce 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					
Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601					
Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804					
Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804		U.S. Mail Hand Delivered Overnight Mail Email/iCourt/eServe: dommanpress@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  DATED: 8/29/23	Perk of	U.S. Mail Hand Delivered Overnight Mail Email/iCourt/eServe:    efstidham@hollandhart.com    jmjensen@hollandhart.com    asgrande@hollandhart.com    zjmccraney@hollandhart.com    ashenderson@hollandhart.com			

# EXHIBIT 2

Doyle S. Byers (11440)
Engels Tejeda (11427)
HOLLAND & HART LLP
222 S. Main St., Suite 2200
Salt Lake City, Utah 84101
Telephone: (801) 799-5800
Facsimile: (801) 799-5700
dsbyers@hollandhart.com
ejtejeda@hollandhart.com

Attorneys for Plaintiffs and Judgment Creditors St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd.

### IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

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.,

Plaintiffs,

v.

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.

DECLARATION IN SUPPORT OF NOTICE OF FILING OF FOREIGN JUDGMENT

Case No. 23-6933088

- I, Robert Faucher, pursuant to Utah Code § 78B-18a-106, declare as follows:
- 1. I am an attorney with the law firm of Holland & Hart LLP, a member in good standing of the bar of the State of Idaho, admitted to practice before all federal and state courts in Idaho, and over the age of 21.
- 2. Holland & Hart represents the Judgment Creditors 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. for the purpose of filing a Judgment from the Fourth Judicial District
  Court of the State of Idaho, County of Ada, Case No. CV01-22-06789, in favor of St. Luke's
  Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. against Ammon Bundy,
  Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC,
  and People's Rights Network.
  - 3. This Declaration is made to satisfy the requirement of Utah Code §78B-5-303.
  - 4. There is no present stay of the Idaho judgment.
  - 5. The names and address of the Judgment Creditors are:

St. Luke's Health System, Ltd. St. Luke's Regional Medical Center, Ltd. c/o Erik F. Stidham P.O. Box 2527 Boise, ID 83701

6. The last known address of the Judgment Debtors are:

Ammon Bundy 4615 Harvest Lane Emmett, ID 83617

Ammon Bundy for Governor 4615 Harvest Lane Emmett, ID 83617 Diego Rodriguez 1317 Edgewater Drive #5077 Orlando, FL 32804

Freedom Man Press LLC 1317 Edgewater Drive #5077 Orlando, FL 32804

Freedom Man PAC 1317 Edgewater Drive #5077 Orlando, FL 32804

People's Rights Network 4615 Harvest Lane Emmett, ID 83617

I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on September 29, 2023.

/s/ Robert Faucher
Robert Faucher

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