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Robert A. Faucher (ISB #4745)  
Jennifer M. Jensen (ISB #9275)  
Alexandra S. Grande (ISB #9566)  
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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

**NOTICE OF INTENT TO SERVE  
SUBPOENA DUCES TECUM TO  
WELLS FARGO BANK,  
NATIONAL ASSOCIATION**

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 in the form attached hereto as "**Exhibit A**" on **Wells Fargo Bank, National Association**. Plaintiffs intend to serve the Subpoena Duces Tecum on **November 21, 2023**, or as soon thereafter as service may be effectuated.

DATED this 13th day of November, 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  
*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: [aebundy@bundyfarms.com](mailto:aebundy@bundyfarms.com)

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)

*/s/ Robert A. Faucher*

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

# **EXHIBIT A**

Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
Jennifer M. Jensen (ISB #9275)  
Alexandra S. Grande (ISB #9566)  
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[rfaucher@hollandhart.com](mailto:rfaucher@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 WELLS  
FARGO BANK, NATIONAL  
ASSOCIATION**

**STATE OF IDAHO TO:** Wells Fargo Bank, National Association  
c/o Corporation Service Company  
1305 12th Avenue Road  
Nampa, ID 83686

**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 December 20, 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: November 21, 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  
*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of November, 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	<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:
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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"/> <u>Email/iCourt/eServe:</u> <a href="mailto:freedommanpress@protonmail.com">freedommanpress@protonmail.com</a>
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*/s/ Robert A. Faucher*

\_\_\_\_\_  
Robert A. Faucher  
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.