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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

**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 27th 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

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

/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.