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*Attorneys for Plaintiffs and Judgment Creditors*

**IN THE THIRD JUDICIAL DISTRICT  
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, NP,

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.

**NOTICE OF INTENT TO SERVE  
SUBPOENA FOR VIDEOTAPED  
DEPOSITION DUCES TECUM OF  
WENDY K. LEATHAM**

Case No. 236933088

Judge William K. Kendall

(Tier Exempt)

PLEASE TAKE NOTICE that Plaintiffs, by and through their undersigned counsel, will issue a subpoena for a videotaped deposition duces tecum to Wendy K. Leatham.

A copy of the subpoena is attached hereto. The subpoena will be issued and served after the filing of this notice.

Dated this 31st day of January, 2024.

HOLLAND & HART LLP

By: /s/ Doyle S. Byers

Doyle S. Byers

Engels J. Tejada

*Attorneys for Plaintiffs and Judgment  
Creditors*

## CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2024, I electronically filed the foregoing **NOTICE OF INTENT TO SERVE SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM OF WENDY K. LEATHAM** with the Clerk of Court using the GreenFiling system, and served a copy of the same in the manner indicated 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/eServe</u> : aebundy@bundyfarms.com
Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Lane 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:
Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Drive, #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:
Diego Rodriguez 1317 Edgewater Drive, #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/eServe: freedommanpress@protonmail.com

*/s/ Doyle S. Byers* \_\_\_\_\_

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Doyle S. Byers (11440)  
HOLLAND & HART LLP  
222 S. Main Street, Suite 2200  
Salt Lake City, Utah 84101  
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dsbyers@hollandhart.com  
ejtejeda@hollandhart.com

*Attorneys for Plaintiffs and Judgment Creditors*

**IN THE THIRD JUDICIAL DISTRICT  
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ST. LUKE'S HEALTH SYSTEM, LTD.;  
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and PEOPLE'S RIGHTS NETWORK, a  
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association,

Defendants.

**SUBPOENA FOR VIDEOTAPED  
DEPOSITION DUCES TECUM OF  
WENDY K. LEATHAM**

Case No. 236933088

Judge William K. Kendall

(Tier Exempt)

**STATE OF UTAH TO:** Wendy K. Leatham  
10374 North 6530 West  
Highland, UT 84003-6705

**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:** JD Legal Support  
2901 W. Bluegrass Boulevard  
Lehi, UT 84043

**DATE/TIME:** On Tuesday, February 27, 2024, at 9:30 a.m.

- 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 for a statement of the documents and objects to be produced.

**PLACE:** JD Legal Support  
2901 W. Bluegrass Boulevard  
Lehi, UT 84043

**DATE/TIME:** On or before February 20, 2024, at 5:00 p.m. You may produce the documents electronically to [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com).

- to permit inspection of the following premises at the date and time specified below.

Attached as **Exhibit B** is a Notice to Persons Served with a Subpoena.

DATED: January 31, 2024.

HOLLAND & HART LLP

By: /s/ Doyle S. Byers

Doyle S. Byers  
Engels J. Tejada  
*Attorneys for Plaintiffs and Judgment  
Creditors*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2024, I served a copy of the foregoing **SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM OF WENDY K. LEATHAM** in the manner indicated 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/eServe</u> : aebundy@bundyfarms.com
Ammon Bundy Ammon Bundy for Governor People’s Rights Network c/o Ammon Bundy 4615 Harvest Lane 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:
Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Drive, #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:
Diego Rodriguez 1317 Edgewater Drive, #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/eServe: freedommanpress@protonmail.com

*/s/ Doyle S. Byers* \_\_\_\_\_

# EXHIBIT A

## Definitions

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

“Campaign” means Ammon Bundy for Governor, an incorporated association that is one of the Defendants and the campaign of Ammon Bundy for Governor more generally.

“Cash” means that U.S. currency that came into Bundy’s possession on or about the following dates in or about the following amounts:

August 14, 2020	\$69,000.00
August 19, 2020	\$26,600.00
December 14, 2020	\$50,000.00
February 26, 2021	\$49,800.00
May 17, 2021	\$40,000.00
August 10, 2021	\$ 9,980.00
August 18, 2021	\$59,800.00
September 17, 2021	\$50,000.00

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, texts, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, communications, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone

conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

The word “person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

“Related Parties” means any entity owned or controlled by any Defendant and includes without limitation Abish-husband Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, and Power Marketing Agency, LLC regardless of if you believe such entity is owned or controlled by any Defendant.

“Related Party” means any one of the Related Parties.

The words “relate to” or “relating to” mean concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

The word “you,” “your,” or “yours,” shall mean Wendy K. Leatham, and any person acting or purporting to act on her behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.



## Document Requests

1. Please produce all documents and communications that relate to the webpage <https://www.givesendgo.com/GAZAG>.
2. To the extent not produced in response to the foregoing request, please produce all documents and communications that relate to: (1) the name(s) of individuals or organizations who created or set up the page <https://www.givesendgo.com/GAZAG>; (2) the name(s) and contact information of individuals or organizations who received funds from the page <https://www.givesendgo.com/GAZAG>; (3) the distribution of monies donated or paid into the funds associated with <https://www.givesendgo.com/GAZAG>; and (4) the purposes that you intend the funds associated with <https://www.givesendgo.com/GAZAG> to be used for.
3. To the extent not produced in response to the foregoing request, please produce all documents and communications that relate to the disbursement of the funds associated with the page <https://www.givesendgo.com/GAZAG>, including, but not limited to, disbursement of the funds to any Defendant or to any Related Entity.
4. Please produce all documents and communications that relate to the assets of any Defendant or any Related Entity. This request includes, but is not limited to, all documents or communications relating to bank accounts, credit union accounts, securities accounts, other financial accounts, cash, cryptocurrency, precious metals, vehicles, stocks, bonds, securities, mutual funds, jewelry, patents, intellectual property, certificates of deposit, promissory notes, buildings, machinery, furniture or other goods, and real property.
5. Please produce all documents and communications that relate to the finances of any Defendant or of any Related Entity. This request includes, but not limited to, all documents or communications relating to bank accounts, credit union accounts, securities accounts, cash, other financial accounts, cryptocurrency wallets, checks, bills, invoices, expenses, payments, distributions, donations, or monetary transfers of any kind for any Defendant or Related Entity.
6. Please produce all documents and communications that relate to any payments, services, goods, or other benefit you have made or provided to any Defendant or to any Related Entity.
7. Please produce all documents and communications that relate to payments, services, goods, or other benefits you have received from any Defendant or from any Related Entity.
8. To the extent not produced in response to the foregoing requests, please produce all documents and communications that relate to any transfer of money made by any Defendant or Related Entity.
9. Please produce all documents and communications that relate to your roles with the Campaign from March 1, 2022, to present.

10. Please produce all documents and communications that relate to the Campaign's finances, including, but not limited to, all receipts and disbursements, including all documents and communications relating to all receipts and disbursements involving a Defendant or a Related Entity.
11. To the extent not produced in response to the foregoing requests, please produce all documents and communications that reflect the name(s) of individuals or organizations who donated to the Campaign.
12. To the extent not produced in response to the foregoing requests, please produce all documents and communications that reflect the name(s) of individuals or organizations who received funds from the Ammon Bundy for Governor campaign.
13. To the extent not produced in response to the foregoing requests, please produce all documents and communications that reflect the amount of funds that any Defendant or any Related Party donated to or received from the Campaign.
14. To the extent not produced in response to the foregoing requests, please produce all documents and communications that relate to Ammon Bundy's personal use or retention of Campaign funds or donations.
15. Please produce all documents and communications that relate to your role(s) in the People's Rights Network, including, but not limited to, your duties, responsibilities, and authorities with the People's Rights Network.
16. Please produce all documents and communications that relate to the membership of People's Rights Network, including, but not limited to, membership lists, member email addresses, member phone numbers, and member mailing addresses.
17. Please produce all documents and communications relating to the transfer of the Cash to Bundy.

## EXHIBIT B

### Notice to Persons Served with a Subpoena

A subpoena may require you to copy and mail documents, produce documents or tangible things, appear at a hearing, trial, or deposition, or allow inspection of a location.

A subpoena can be issued by the court clerk or by a licensed attorney. You must do what it says or file an objection. If you don't comply, you can be fined or go to jail.

You can find more information about subpoenas and forms you may need at:  
[www.utcourts.gov/resources/forms/subpoena/](http://www.utcourts.gov/resources/forms/subpoena/)

1. If the subpoena requires you to **appear to at a trial, hearing, deposition, or for inspection of a place**, you must appear at the date, time, and place designated in the subpoena. You will be required to either answer questions under oath or allow inspection of a place.

For a deposition or inspection of premises, you can be commanded to appear in only the following counties:

- If you are a resident of Utah:
  - where you reside;
  - where you are employed;
  - where you transact business in person; or
  - where the court orders.
- If you are not a resident of Utah:
  - where you are served with the subpoena; or
  - where the court orders.

2. If the subpoena requires you to **copy documents or electronically stored information**, you must:
  - organize the copies as you keep them in the ordinary course of business or organize and label them to correspond with the categories in the subpoena; and
  - mail or deliver the copies and the Declaration of Compliance with the Subpoena to the attorney or party requesting the documents. You may need to modify the Declaration to fit your circumstances.

The party who requested the documents must pay the reasonable cost of copying the documents.

3. If the subpoena requires you to **produce documents or tangible things**, you must appear in person with the documents or tangible things so that they may be tested, copied, sampled, or inspected. You must:

- produce the documents or tangible things as you keep them in the ordinary course of business or organize and label them to correspond with the categories in the subpoena; and
- mail or deliver the Declaration of Compliance with the Subpoena to the requesting attorney or party.

The subpoena may require you to produce the documents at the trial, hearing, or deposition or to mail them to the issuing party or attorney.

The subpoena must be served on you at least 14 days before the date designated for compliance.

The party issuing the subpoena must pay the reasonable cost of copying and producing the documents or tangible things.

4. **Witness fee.** If the subpoena requires you to appear, a one-day witness fee must be served with the subpoena. A one-day witness fee is \$18.50 plus mileage. The witness fee for each subsequent day is \$49.00 plus mileage. Mileage is \$1.00 for each 4 miles you have to travel over 50 miles (one direction).

A subpoena issued on behalf of the United States or Utah does not have to include a witness fee and mileage.

5. **Objection to a subpoena.** You may object to all or part of the subpoena if :

- it does not give you a reasonable amount of time to comply.
- it creates an undue burden for you.
- it requires you to disclose privileged or other protected matter and no exception or waiver applies.
- it requires you to disclose a trade secret or other confidential research, development, or commercial information.
- it requires you to disclose an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study that was not made at the request of a party.
- you are a Utah resident and it requires you to appear at a deposition or to produce documents, electronic records or tangible things or to permit inspection of premises in a county:
  - in which you do not reside,
  - are not employed, or
  - do not transact business in person,
 unless the judge orders otherwise.
- you are not a Utah resident and it requires you to appear at a deposition or to produce documents, electronic records or tangible things or to permit inspection of

premises in a county other than the county in which you were served, unless the judge orders otherwise.

You must comply with those parts of the subpoena to which you do not object.

6. **How to object.** To object to the subpoena, complete and serve the Objection to Subpoena on the party or attorney issuing the subpoena before the compliance date.

Once you have filed the objection, you do not have to comply with the subpoena unless ordered to do so by the court.

7. **Motion to compel.** If you serve an Objection to Subpoena on the party or attorney issuing the subpoena, they may file a motion asking the court to make you comply with the subpoena. They may also ask for a hearing on the motion.

If you do not agree with the motion, you can file a Memorandum Opposing the Motion. See the court's Motions web page for information and forms:  
[www.utcourts.gov/howto/filing/motions/](http://www.utcourts.gov/howto/filing/motions/).

It is possible to ask the judge to order conditions for complying with the subpoena. Consider talking to an attorney to go over your options. See the Finding Legal Help web page for information about free and low cost ways to get legal help:  
[www.utcourts.gov/howto/legalassist/](http://www.utcourts.gov/howto/legalassist/).

8. **Organizations.** If the subpoena orders a corporation, partnership, association or governmental agency that is not a party to the suit to appear at a deposition, they must designate one or more persons to answer questions on their behalf. (Utah Rule of Civil Procedure 30).

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Name

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Address

---

City, State, Zip

---

Phone

---

Email

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

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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,

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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.

**OBJECTION TO SUBPOENA**

Case No. 236933088

I have been served with a subpoena in this case, and I object because the subpoena:

1.  Does not give me a reasonable amount of time to comply (Explain).

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2.  Creates an undue burden for me (Explain. Attach additional pages if needed).

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3.  Requires me to disclose privileged or other protected matter and no exception or waiver applies. (Describe the document or thing. Be specific.)

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4.  Requires me to disclose a trade secret or other confidential research, development, or commercial information. (Describe the document or thing. Be specific.)

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5.  Requires me to disclose an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study that was not made at the request of a party.

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6.  Requires me, a resident of Utah, to:

- appear at a deposition;
- produce documents, electronic records or tangible things; or
- permit inspection of a premises

in a county in which I do not reside, am not employed, and do not transact business in person.

7.  Requires me, a non-resident of Utah, to:

- appear at a deposition;
- produce documents, electronic records or tangible things; or
- permit inspection of a premises

in a county other than the county in which I was served.

8. [ ] Other.

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**Person subject to subpoena**

I declare under criminal penalty under the law of Utah that everything stated in this document is true.

Signed at \_\_\_\_\_ (city, and state or country).

_____	Signature ►	_____
Date	Printed Name	_____

**Attorney or Licensed Paralegal Practitioner of record** (if applicable)

_____	Signature ►	_____
Date	Printed Name	_____



### Certificate of Service

I certify that I filed with the court and am serving a copy of this Objection to Subpoena on the following people.

Person's Name	Service Method	Service Address	Service Date
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		

\_\_\_\_\_ Signature ► \_\_\_\_\_  
 Date Printed Name \_\_\_\_\_

31265966\_v1