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WY Laramie County
District Court 1st JD
Feb 09 2024 04:30PM
2023-CV-0201894
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FILED

ATTORNEY 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

STATE OF WYOMING)
) ss
COUNTY OF LARAMIE) IN THE DISTRICT COURT
FIRST JUDICIAL DISTRICT

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,

Civil Action No. 2023-CV-0201894

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.

APPLICATION FOR WRIT OF EXECUTION
AS TO AMMON BUNDY

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 (the "Judgment Creditors"), by and through their attorneys of record, Holland & Hart LLP, hereby move and apply to this Court for a Writ of Execution as to Ammon Bundy.

1. This application is supported by the Declaration of Robert A. Faucher ("Faucher Decl.") filed herewith.

2. On August 29, 2023, the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, entered a Default Judgment in favor of the 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").

3. Among other things, the Default Judgment contained a money judgment in favor of the Judgment Creditors and against the Judgment Debtors in the amount of **\$51,875,000**, broken down as follows:¹

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
Tracy Jungman	Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network	\$12,125,000

4. All Judgment Debtors are jointly and severally liable pursuant to the terms of the August 29, 2023, Default Judgment. The Judgment Creditors “are entitled to have all damages owed to them to be collected jointly and severally from all Defendants.” *See* Faucher Decl., ¶ 4.

5. The Judgment Debtors have paid nothing toward the Default Judgment as of the date hereof and the Judgment Creditors have recovered nothing except as provided in footnote 2 below. The Default Judgment's current balance is approximately **\$51,875,000**, exclusive of post-judgment interest.²

¹ The Default Judgment also awarded St. Luke’s Health System, Ltd. and St. Luke’s Regional Medical Center, Ltd. \$13,443.21 for attorney fees and costs against Ammon Bundy that had been previously awarded but that remained unpaid by Ammon Bundy as of the date of the Default Judgment. The Judgment Creditors do not seek a writ of execution on that part of the judgment at this time, but they reserve all of their rights. Similarly, the Judgment Creditors do not seek to recover post-judgment interest at this time, but they reserve all of their rights.

² One of the Judgment Creditors does now own a residence formerly belonging to Judgment Debtor Ammon Bundy. However, no application of the value of that residence to the judgment has yet taken place. Accordingly, the amount stated in ¶ 5 above does not give the Judgment Debtors a credit for the value of the residence.

6. No stay of execution exists. The Judgment Creditors intend to collect the Default Judgment in their favor against Ammon Bundy to the extent possible.

7. The Judgment Creditors domesticated the Default Judgment with this Court on November 15, 2023. The Judgment Creditors mailed notice of the filing of the foreign judgment to the Judgment Debtors on November 16, 2023. The Judgment Creditors filed the Notice of Filing of Foreign Judgment on November 16, 2023, evidencing proof of mailing on the Certificate of Service.

8. Judgment Creditors believe that the Judgment Debtors, or some of them, may have assets in Laramie County, Wyoming.

9. The Judgment Creditors hereby apply for and request the issuance of a writ of execution under Rule 69 of the Wyoming Rules of Civil Procedure, Wyo. Stat. Ann. §§ 1-17-308 to 1-17-313, §§ 1-19-101 to 1-19-108, and other applicable law against Judgment Debtor Ammon Bundy. A proposed writ of execution against Ammon Bundy is submitted herewith. In light of the issues addressed in footnotes 1 and 2 and in the Faucher Declaration, the proposed writ of attachment identifies the amount of the outstanding judgment liability in the amount of \$50,000,000.00 (Fifty Million Dollars). While the Judgment Debtors' liability is in excess of that amount, that figure gives Ammon Bundy protection should the value of the residence at some point be applied to his judgment liability.

WHEREFORE, Judgment Creditors apply for the issuance of a writ of execution in the form submitted herewith.

DATED: February 9, 2024.

/s/ Janae E. Ruppert

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TRACY W. JUNGMAN, NP

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of February, 2024, I 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

/s/ Janae E. Ruppert

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