

Janae E. Ruppert (Wyo. State Bar # 7-4717)  
HOLLAND & HART LLP  
2020 Carey Avenue, Suite 800  
P.O. Box 1347  
Cheyenne, WY 82003-1347  
Telephone: (307) 778-4200  
Facsimile: (307) 778-8175  
JERuppert@hollandhart.com

WY Laramie County  
District Court 1st JD  
Feb 09 2024 04:30PM  
2023-CV-0201894  
72011097

**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,

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.

Civil Action No. 2023-CV-0201894

**DECLARATION<sup>1</sup> OF ROBERT A. FAUCHER IN SUPPORT OF APPLICATION FOR  
WRIT OF EXECUTION TO AMMON BUNDY**

I, Robert A. Faucher, being first duly sworn on oath, and upon personal knowledge of the facts and circumstances recited herein, depose and state as follows:

1. I am a partner in the Boise office of the law firm of Holland & Hart LLP and I am licensed to practice law in the State of Idaho. Along with my colleague identified above, I am counsel 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 (collectively, the "Judgment Creditors"). I make this Declaration on behalf of the Judgment Creditors for the purpose of

<sup>1</sup> This document is being submitted as a sworn declaration in lieu of an affidavit pursuant to Wyo. Stat. Ann. § 1-2-104.

obtaining the issuance of a writ of execution to the Sheriff of Laramie County in the above-entitled matter.

2. On August 29, 2023, the Judgment Creditors received a judgment in the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, CV01-22-06789, 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”), jointly and severally, for \$51,875,000 and accruing costs and interest. A true and correct copy of the Default Judgment was attached as an exhibit to the Application for Foreign Judgment filed in this proceeding on November 15, 2023.

3. Among other things, the Default Judgment contained a money judgment in favor of the Judgment Creditors and against the Judgment Debtors jointly and severally in the amount of **\$51,875,000**.

4. The Default Judgment states that the Judgment Debtors are jointly and severally liable for the judgment. In addition, on August 29, 2023—the same day the Default Judgment was entered—this Court issued an Order on Verdict and Default Judgment. In that paper, the Court wrote that the Judgment Creditors “are entitled to have all damages owed to them to be collected jointly and severally from all Defendants.” A true and correct copy of the Order on Verdict and Default Judgment is attached hereto as **Exhibit A**.

5. As of the date of this Declaration, the Judgment Debtors have paid nothing toward the Default Judgment. Nor have the Judgment Creditors executed on any property to recover the Default Judgment. Nor have the Judgment Creditors recovered any money by means of a garnishment. However, the Judgment Creditor St. Luke’s Health System, Ltd. did obtain ownership of a home formerly owned by judgment debtor Ammon Bundy and his spouse. St. Luke’s Health System, Ltd. obtained the home by means of a deed voluntarily granted by a transferee of Ammon Bundy and his spouse, a transfer the Judgment Creditors had challenged as a fraudulent conveyance. The house is by any measure worth less than \$1.5 million. It has not yet been determined how, if at all, the house will or should be credited against the Judgment Debtors’ liability. Regardless, the writ of attachment that Judgment Creditors seek in this Wyoming action is in the amount of \$50 million so that the Judgment Debtors’ interest in their Wyoming assets is not prejudiced regardless of how the house is (or is not) eventually applied to Judgment Debtors’ liability.

6. The Default Judgment and the Order on Verdict and Default Judgment have been served on the Judgment Debtors as reflected therein.

7. No stay of execution exists.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

DATED this 9th day of February, 2024.

*/s/Robert A. Faucher*

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

ATTORNEY FOR PLAINTIFFS

PLACE OF EXECUTION: BOISE, IDAHO

DATE OF EXECUTION: FEBRUARY 9, 2023

**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*

---

Janae E. Ruppert

# **EXHIBIT A**

**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

I, Theresa Fuze, Deputy Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, do hereby certify that the annexed copies of the Default Judgment, in the case of St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman vs Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man PAC, Peoples Rights Network, Freedom Man Press LLC, have been by me compared with the originals, and that these are a correct transcript and true copies there from and of the whole of such original records as the same appear on file and of record in my office and in my custody.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said Court on 9/15/2023 8:28:37 AM

Trent Tripple  
Clerk of the District Court of the Fourth  
Judicial District, in and for the County of Ada

Theresa Fuze  
Deputy Clerk

**CERTIFICATE OF PRESIDING JUDGE**

I, Nancy Baskin, presiding ~~Magistrate~~ or District Judge of the Fourth Judicial District of the State of Idaho, do hereby certify that Trent Tripple, and his/her deputy who signed the foregoing certificate of attestation is now and was at the time of signing and sealing of the same, the duly elected, qualified and acting Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada; that he/she is the legal keeper of the records and seal of said Court; that his/her signature as it appears signed to the said certificate of attestation is genuine; that the seal affixed to said certificate is the seal of said Court; and that the attestation is in due form and by the proper officer.

IN WITNESS WHEREOF, I have hereunto set my hand on 9/18/2023 7:03:03 PM

Nancy A. Baskin  
Judge Nancy Baskin

**CERTIFICATE OF THE CLERK**

I, Theresa Fuze, Deputy Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, do hereby certify that Nancy Baskin, who signed the foregoing certificate, now is, and was at the time of the signing of the same, the presiding Magistrate or District Judge of said Court, duly elected and qualified; that said Court is a Court of record; and that the signature of said presiding Magistrate or District Judge, as it appears signed to said certificate is his/her genuine signature.

IN WITNESS WHEREOF, I have hereunto set my hand on 9/18/2023

Trent Tripple  
Clerk of the District Court of the Fourth  
Judicial District, in and for the County of Ada

Theresa Fuze  
Deputy Clerk

**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].

3. 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)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. 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:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. 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.freedomman.org>, <https://stlukeseExposed.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\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=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.votebundy.com>,

<https://www.freedomman.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\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=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: 8/29/2023

STATE OF IDAHO }  
COUNTY OF ADA }

I, Trent Tripple, Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, do hereby certify that the foregoing is a true and correct copy of the original on file in this office. In witness whereof, I have hereunto set my hand and affixed my official seal this 29 day of September, 2023.  
TRENT TRIPPLE

By:  Deputy

  
NANCY A. BASKIN  
District Court Judge

CERTIFICATE OF SERVICE

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance 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

- 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:

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:

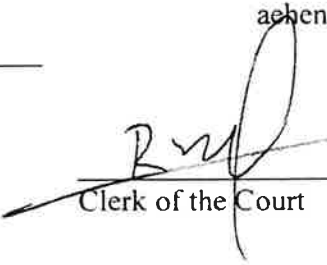
Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
freedommanpress@protonmail.com

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
efstidham@hollandhart.com  
jmjensen@hollandhart.com  
asgrande@hollandhart.com  
zjmccraney@hollandhart.com  
aehenderson@hollandhart.com

DATED: 8/29/23

  
\_\_\_\_\_  
Clerk of the Court