

Erik F. Stidham (ISB #5483)
Robert A. Faucher (ISB #4745)
Jennifer M. Jensen (ISB #9275)
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Anne Henderson Haws (ISB #10412)
HOLLAND & HART LLP
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rafaucher@hollandhart.com
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zmccraney@hollandhart.com
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

**NOTICE OF INTENT TO SERVE
SUBPOENA FOR DEPOSITION DUCES
TECUM TO CLARITY CREDIT UNION**

PLEASE TAKE NOTICE pursuant to Rule 45(c) of the Idaho Rules of Civil Procedure, that 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 for Deposition Duces Tecum in the form attached hereto as "Exhibit A" on **Clarity Credit Union**. Plaintiffs intend to serve the Deposition Subpoena Duces Tecum on March 4, 2023 or as soon thereafter as service may be effectuated.

DATED: February 23, 2024.

HOLLAND & HART LLP

By: /s/Robert A. Faucher

Erik F. Stidham
Robert A. Faucher
Jennifer M. Jensen
Zachery J. McCraney
Anne Henderson Haws

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2024, I caused to be filed via iCourt and 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:

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

Lisa Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

/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)
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jmjensen@hollandhart.com
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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 FOR DEPOSITION DUCES
TECUM TO CLARITY CREDIT UNION**

STATE OF IDAHO TO: Clarity Credit Union
c/o Wendy Edwards, its Registered Agent
18880 S. Cobalt Point Way
100
Clarity Credit Union – Admin
Meridian, ID 83642

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.

Pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, Clarity Credit Union must produce for its deposition, one or more officers, directors, or managing agents, or other persons who are qualified to testify on its behalf as to each matter identified in **Exhibit A, Topics for the Deposition**.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: Thursday, April 4, 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, Documents to Be Produced.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: Wednesday, April 3, 2024 at 9:30 a.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: February 23, 2024.

HOLLAND & HART LLP

By: *s/ Robert A. Faucher*

Erik F. Stidham

Robert A. Faucher

Jennifer M. Jensen

Zack J. McCraney

Anne Henderson Haws

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2024, 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
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Ammon Bundy
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
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Emmett, ID 83617-3601

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- Email/iCourt/eServe:
freedommanpress@protonmail.com

Lisa Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

/s/ Robert A. Faucher

Erik F. Stidham
OF HOLLAND & HART LLP

EXHIBIT A

Documents to be Produced

All of the following documents, to the extent not already produced by you in your prior document production to Plaintiffs on or about (1) November 20, 2023 and (2) November 27, 2023.

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.

8. All records of any kind in your possession pertaining to Dono Custos, Inc., a Wyoming corporation, 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, deposited items, loan agreements, and security agreements.
9. All records of any kind in your possession pertaining to Abish-husbandi Inc., a dissolved Wyoming corporation, 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, deposited items, loan agreements, and security agreements.
10. All records of any kind in your possession pertaining to Freedom Tabernacle Incorporated, an Idaho corporation, 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, deposited items, loan agreements, and security agreements.
11. All records of any kind in your possession pertaining to Power Marketing Agency, LLC, an Idaho limited liability company, 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, deposited items, loan agreements, and security agreements.
12. All records of any kind in your possession pertaining to Power Marketing Consultants LLC, a dissolved Idaho limited liability company, 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, deposited items, loan agreements, and security agreements.

Topics for the Deposition

1. The Currency Transaction Reports submitted by Idaho Central Credit Union with respect to Abish-husbandi Inc. on or about December 23, 2020, March 1, 2021, June 2, 2021, and September 24, 2021 (collectively, the “Currency Transaction Reports”).
2. The currency transactions that are the subject of the Currency Transaction Reports.
3. The documents produced by you on or about November 20, 2023, on or about November 27, 2023, and in response to this subpoena (the “Documents”).
4. The transactions reflected in the Documents as follows: “Internet From- ; Src: 1-00 Dst: 1612161-SD-00.”
5. The transactions reflected in the Documents (the “Transactions”), including without limitation all oral representations from any member regarding the Transactions.
6. Any meetings between Ammon Bundy and any employee of Clarity Credit Union.
7. Any meetings between any representative of Bundy for Governor campaign and any employee of Clarity Credit Union, including without limitation any meeting involving the use of Account No. 1612161 by the Bundy for Governor campaign.

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