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Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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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

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

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, 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 **Idaho Central Credit Union**. Plaintiffs intend to serve the Subpoena Duces Tecum on **March 4, 2023**, or as soon thereafter as service may be effectuated.

DATED this 23rd day of February, 2024.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

Erik F. Stidham

Robert A. Faucher

Zachery J. McCraney

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2024, I caused the foregoing to be served 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> aebundy@bundyfarms.com
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Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. 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 Dr., #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 Dr., #5077 Orlando, FL 32804	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/iCourt/eServe: freedommanpress@protonmail.com
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Power Marketing Consultants LLC Attn: Diego Rodriguez, Registered Agent 1317 Edgewater Dr., #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/iCourt/eServe: freedommanpress@protonmail.com
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Power Marketing Consultants LLC Attn: Diego Rodriguez, Registered Agent 1876 E. Adelaide Drive Meridian, ID 83641-9219	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/iCourt/eServe: freedommanpress@protonmail.com
--	---

Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered
Agent
9169 W. State St., Ste 3177
Boise, ID 83714

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

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered
Agent
1876 E. Adelaide Drive
Meridian, ID 83642-9219

- 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

Erik F. Stidham (ISB #5483)
Robert A. Faucher (ISB #4745)
Zachery J. McCraney (ISB #11552)
Anne E. Henderson (ISB #10412)
HOLLAND & HART LLP
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jmjensen@hollandhart.com
zjmccraney@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

**SUBPOENA FOR DEPOSITION DUCES
TECUM TO IDAHO CENTRAL CREDIT
UNION**

STATE OF IDAHO TO: Idaho Central Credit Union
4400 Central Way
Chubbuck, ID 83202

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 deposition in the above case. A court reporter will be present to transcribe the testimony. The deposition may also be videotaped.

Pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, Idaho Central Credit Union must produce for its deposition, one or more officers, directors, or managing agents, or other persons who consent 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: Friday, April 5, 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.

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

Zack J. McCraney

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
- 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

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
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Orlando, FL 32804

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Boise, ID 83714

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Freedom Tabernacle Incorporated
c/o Diego Rodriguez, Registered Agent
9169 W. State Street
#3177
Boise, ID 83714

- 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

Documents

1. All records of any kind in your possession pertaining to Diego Rodriguez, an individual, 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 (including e-mail and text correspondence), paid items, returned items, cancelled items, deposited items, loan agreements, loan applications, membership applications, credit reports, financial statements, promissory notes, membership agreements, security agreements, appraisals and motor vehicle titles.
2. All records of any kind in your possession pertaining to Freedom Tabernacle Incorporated, an Idaho corporation, generated on and after January 1, 2018 including signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence (including e-mail and text correspondence), paid items, returned items, cancelled items, deposited items, loan agreements, loan applications, membership applications, credit reports, financial statements, promissory notes, membership agreements, appraisals and security agreements.
3. 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 signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence (including e-mail and text correspondence), paid items, returned items, cancelled items, deposited items, loan agreements, loan applications, membership applications, credit reports, financial statements, promissory notes, membership agreements, appraisals and security agreements.
4. All records of any kind in your possession pertaining to Power Marketing Consultants, LLC, an Idaho limited liability company, generated on and after January 1, 2018 including signature cards, savings account statements (and enclosures), checking account statements (and enclosures), certificates of deposit, account agreements, correspondence (including e-mail and text correspondence), paid items, returned items, cancelled items, deposited items, loan agreements, loan applications, membership applications, credit reports, financial statements, promissory notes, membership agreements, appraisals and security agreements.

Topics for the Deposition

1. The documents that have been produced.
2. All correspondence, transactions and interactions with or pertaining to Diego Rodriguez, Freedom Tabernacle Incorporated, and Power Marketing Agency, LLC and Power Marketing Consultants, LLC.

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