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Robert A. Faucher (ISB #4745)
Jennifer M. Jensen (ISB #9275)
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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

**NOTICE OF INTENT TO SERVE
SUBPOENA FOR VIDEOTAPED
DEPOSITION DUCES TECUM OF
TOM BRANSON**

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 Videotaped Deposition Duces Tecum in the form attached hereto as "**Exhibit A**" on Tom Branson. Plaintiffs intend to serve the Subpoena for Videotaped Deposition Duces Tecum on March 12, 2024, or as soon thereafter as service may be effectuated.

DATED this 4th day of March, 2024.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

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

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 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:
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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:
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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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Freedom Tabernacle, Incorporated Attn: Diego Rodriguez, Registered Agent 1876 E. Adelaide Drive Meridian, ID 83642-9219	<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
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/s/Erik F. Stidham

Erik F. Stidham
of Holland & Hart LLP

EXHIBIT A

Erik F. Stidham (ISB #5483)
Robert A. Faucher (ISB #4745)
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Zachery J. McCraney (ISB #11552)
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E-mail: efstidham@hollandhart.com
rafaucher@hollandhart.com
jmjensen@hollandhart.com
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

**SUBPOENA FOR VIDEOTAPED
DEPOSITION DUCES TECUM TO TOM
BRANSON**

STATE OF IDAHO TO: Tom Branson
1121 N. 800 West
Preston, Idaho 83263

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 in-person at the following location and date and time.

PLACE: Fuller & Fuller, PLLC
24 N. State Street
Preston, Idaho 83263

DATE/TIME: April 15, 2024 at 9:00 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: On or before April 8, 2024, at 5:00 p.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: March 4, 2024

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham
Jennifer M. Jensen
Alexandra S. Grande
Zachery J. McCraney
Anne E. Henderson
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 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:

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/Erik F. Stidham

Erik F. Stidham
For HOLLAND & HART LLP

EXHIBIT A

Definitions

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

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

“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.

“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.

“Related Parties” shall mean any entity owned or controlled by any Defendant and includes without limitation Abish-husbondi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, and Power Marketing Agency, LLC, Power Marketing Consultants Agency, LLC, and Infinite Power, LLC.

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

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, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, 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 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 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 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.

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.

“Asset” or “Assets” is anything that has current or future economic value, including, but not limited to money, securities, real property, promissory notes, contracts, accounts receivable, cryptocurrency, patents, trademarks, or precious metals.

Documents Requested

1. Please produce all communications with Ammon Bundy between 2021 and present.
2. Please produce all documents relating to any transaction that you have been involved in with Ammon Bundy.
3. Please produce all documents relating to any transaction involving Global Trading & Investments Inc. and Ammon Bundy, Lisa Bundy, or any entity owned or controlled by Ammon Bundy or Lisa Bundy.
4. Please produce all documents relating to any Assets owned by Ammon Bundy, Lisa Bundy, or any entity owned or controlled by Ammon Bundy or Lisa Bundy.

5. Please produce all documents and communications relating to Abish-husbandi Inc.
6. Please produce all documents and communications relating to your ownership interest, if any, in Abish-husbandi Inc.
7. Please produce all documents and communications relating to any payment made by you to any Defendant or Related Party, including but not limited to, Ammon Bundy. This includes, but is not limited to, any payment of money, securities, real property, cryptocurrency, intellectual property, precious metals, or other things of value.
8. Please produce all documents and communications relating to any payment made to you by any Defendant or Related Party. This includes, but is not limited to, any payment of money, securities, real property, cryptocurrency, intellectual property, precious metals, or other things of value.
9. Please produce all documents and communications relating to any transaction involving you and any Defendant or Related Party. This includes, but is not limited to, any payment of money, securities, real property, cryptocurrency, intellectual property, precious metals, or other things of value.
10. Please produce all documents and communications relating to the following transactions:
 - a. December 12, 2022, check, Check No. 117, from you to Abish-husbandi Inc., in the amount of \$5,000. **Exhibit 1.**
 - b. December 16, 2022, check, Check No. 000101, from Global Trading & Investments Inc. to Abish-husbandi Inc. in the amount of \$6,000. **Exhibit 2.**
 - c. December 20, 2022, check, Check No. 000102, from Global Trading & Investments Inc. to Abish-husbandi Inc., in the amount of \$10,000. **Exhibit 3.**
 - d. January 15, 2023, check, Check No. 122, from you to Abish-husbandi Inc., in the amount of \$5,000. **Exhibit 4.**
 - e. February 13, 2023, check, Check No. 000104, from Global Trading & Investments Inc. to Abish-husbandi Inc., in the amount of \$5,465.84. **Exhibit 5.**
 - f. February 16, 2023, check, Check No. 127, from you to Abish-husbandi Inc., in the amount of \$5,000. **Exhibit 6.**

- g. March 8, 2023, check, Check No. 000200, from Global Trading & Investments Inc. to Abish-husbandi Inc., in the amount of \$4,135.42. **Exhibit 7.**
 - h. April 5, 2023, check, Check No. 000203, from Global Trading & Investments Inc. to Abish-husbandi Inc., in the amount of \$4,145.42. **Exhibit 8.**
 - i. July 5, 2023, check, Check No. 000202, from Global Trading & Investments Inc. to Abish-husbandi Inc., in the amount of \$4,180. **Exhibit 9.**
11. Please produce all documents and communications relating to all donations you made or caused to be made to the Campaign, including the \$880 you donated to the Campaign between July 2021 and November 2022 and the \$72 Rebecca Branson donated to the Campaign between August 2022 and September 2022. **Exhibit 10.**
 12. Please produce all documents and communications relating to all payments you received from the Campaign, including the \$15,000 you received from the Campaign on or around November 28, 2022. **Exhibit 11.**
 13. Please produce all documents and communications relating to the Campaign.
 14. Please produce all documents and communications relating to your involvement with the Campaign. This includes, but is not limited to, all documents and communications relating to any good or service you provided to or performed on behalf of the Campaign.
 15. Please produce all documents and communications with any Defendant or Related Party relating to Ammon Bundy, the Campaign, Abish-husbandi, or People's Rights Network between January 1, 2021, to present.
 16. Please produce all documents and communications that relate to your personal use or retention of Campaign funds or donations.
 17. Please produce all documents and communications that relate to Ammon Bundy's personal use or retention of Campaign funds or donations.
 18. Please produce Abish-husbandi Inc.'s organizational documents, including but not limited to its Articles of Incorporation and any amendments, Bylaws and any amendments, and any Operating Agreement(s).
 19. Please produce all documents and communications relating to Abish-husbandi Inc.'s ownership, including but not limited to all documents showing the number

of shares its issued, who it issued shares to, the value of its shares, whether there are any share certificates pertaining to its shares, and all shareholder agreements.

20. Please produce documents evidencing the number of shares you hold or have at any time held in Abish-husbondi Inc., Dono Custos, Inc., or any other Related Party.
21. Please produce all documents and communications relating to offers to sell or purchase Abish-husbondi Inc.'s shares.
22. Please produce all documents and communications relating to the sales, transfers, or buybacks of Abish-husbondi Inc.'s shares of stock.
23. Please produce all documents and communications relating to the operations of Abish-husbondi Inc. This includes, but is not limited to, all documents and communications relating to the routine tasks and processes Abish-husbondi Inc. performs to generate revenue.
24. Please produce all documents and communications relating to the management of Abish-husbondi Inc. This includes, but is not limited to, all documents and communications relating to the name of every person or entity who manages Abish-husbondi Inc.'s business affairs and Assets or who has managed its business affairs and Assets in the past.
25. Please produce all documents and communications relating to your roles in Abish-husbondi Inc., the Campaign, and People's Rights Network from March 1, 2022, to present. This includes, but not limited to, your duties, responsibilities, and authorities within those organizations.
26. Please produce all documents and communications showing (a) the name of each person or entity who is a director of Abish-husbondi Inc., (b) the name of each person or entity who is an officer of Abish-husbondi Inc., and (c) the name of the person who is assigned the task of preparing minutes of the directors' and shareholders' meetings and for maintaining and authenticating records of Abish-husbondi Inc.
27. Please produce all Minutes of all Directors' and Shareholders' meetings since Abish-husbondi Inc.'s formation in July 2019 to present.
28. Please produce all tax returns for Abish-husbondi Inc. for the years 2019 to present.
29. Please produce all documents and communications relating to every bank account held by Abish-husbondi Inc., including but not limited to copies of all bank account records or statements since its formation in July 2019 to present.

30. Please produce all corporate financial documents, including but not limited to balance sheets, income statements, monthly or annual cash flow statements, or other documents reflecting Abish-husbandi Inc.'s monthly or annual cash balance generated since its formation in July 2019 to present.
31. Please produce all accounting and bookkeeping records for Abish-husbandi Inc., including but not limited to financial statements, compiled financial statements, reviewed financial statements, and audited financial statements, since its formation in July 2019 to present.
32. Please produce all documents evidencing Abish-husbandi Inc.'s capitalization (including subsequent capitalization) since its formation in July 2019 to present.
33. Please produce all corporate books and records not encompassed in the foregoing relating to Abish-husbandi Inc.
34. Please produce all documents and communications relating to loans to Abish-husbandi Inc.
35. Please produce all documents and communications evidencing or relating to Abish-husbandi Inc.'s Assets.
36. Please produce all documents and communications evidencing or relating to Abish-husbandi Inc.'s real estate transactions.
37. Please produce all documents and communications relating to correspondence with tenants of any real estate Abish-husbandi Inc. owns or controls including without limitation the Campaign and Emmett Door, Inc.
38. Please produce copies of all contracts and agreements between you and any Defendant or Related Party.
39. Please produce all documents and communications that relate to the Assets of any Defendant or Related Party. 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.
40. Please produce all documents and communications that relate to the finances of any Defendant or Related Party. 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.

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