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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

**JUDGMENT CREDITORS'
APPLICATION FOR WRIT OF
EXECUTION AS TO ALL
DEFENDANTS AND LISA BUNDY
(CANYON COUNTY)**

The above-captioned Plaintiffs (collectively, the “Judgment Creditors”), by and through their attorneys, Holland & Hart LLP, respectfully represent as follows for this, their Application for a Writ of Execution as to all Defendants and Lisa Bundy (Canyon County).

1. This Application is supported by the Declaration of Robert A. Faucher filed herewith. (“Faucher Decl.”).

2. On August 29, 2023, this Court entered a Default Judgment (the “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 jointly and severally 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

¹ The Default Judgment also awarded St. Luke’s Health System, Ltd. and St. Luke’s Regional Medical Center, Ltd. money for attorney fees and costs that had been previously awarded but that remained unpaid 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.

Judgment Creditor	Judgment Debtors	Amount
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 Default Judgment. The Judgment Creditors “are entitled to have all damages owed to them to be collected jointly and severally from all Defendants.” August 29, 2023, Order on Verdict and Default Judgment.

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

6. No stay of execution exists.

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 liability has yet taken place. In addition, the Gem County Sheriff seized an RV that belonged to Judgment Debtor Diego Rodriguez, but the sheriff’s sale has not taken place yet. The Judgment Creditors directed the Ada County sheriff to garnish the tax refunds due Judgment Debtors, notice of which has been submitted to the state controller. But as of the date hereof, the Judgment Debtors’ tax refunds (if any) have not been received by Judgment Creditors. Finally, the Judgment Creditors were issued a charging order against Diego Rodriguez interests in certain limited liability companies. But nothing has yet been received by Judgment Creditors pursuant to that charging order. Accordingly, the amount stated in ¶ 5 above does not give the Judgment Debtors a credit for the value of the residence, the value of the RV, or the value of any tax refunds. *See Faucher Decl.*, ¶ 7.

Judgment Creditors Are Entitled to a Writ of Execution With Respect to Lisa Bundy

7. The Judgment Creditors are seeking the issuance of a writ to recover from not only the assets of the Judgment Debtors, but from Lisa Bundy also.

8. The Judgment Creditors are entitled to recover their judgment against the community property assets of Lisa Bundy, who is the spouse of Judgment Debtor Ammon Bundy. Ammon Bundy and Lisa Bundy have been married for 22 years. October 29, 2023 Faucher Decl., ¶ 9, Ex. C.

9. Regardless of whether the Default Judgment against Ammon Bundy constitutes his separate debt or a community debt, all of the community property of the marital community is liable for the Default Judgment.

10. Of course, it is axiomatic that if the Default Judgment constitutes a community debt, the community debt is subject to the Default Judgment.

11. The same is true, however, even if the Default Judgment constitutes a separate debt of Ammon Bundy. The Idaho Supreme Court “has long held that the separate debts of either spouse may be paid from community property.” *Credit Bureau of E. Idaho, Inc. v. Lecheminant*, 149 Idaho 468, 472, 235 P.3d 1188, 1193 (2010) (citations omitted).

12. Community property may be under the management or control of either spouse. *See* Idaho Code § 32-912 (both spouses have the right to manage and control community property). Accordingly, community property of the Bundy marital community may be under the management or control of Lisa Bundy. The community property managed by, or in the name of, Lisa Bundy is subject to the Default Judgment. For this reason, the Judgment Creditors are entitled to the issuance of a writ of execution against Lisa Bundy.

Conclusion

13. The Judgment Creditors hereby apply for the issuance of a writ of execution under Rule 69 of the Idaho Rules of Civil Procedure, Idaho Code §§ 11-101 to 11-107, Idaho Code § 8-507, and other applicable law against all Judgment Debtors and Lisa Bundy. A proposed writ of execution against Judgment Debtors and Lisa Bundy is submitted herewith. Judgment Creditors believe that the Judgment Debtors and/or Lisa Bundy may have assets in Canyon County. In light of the issues addressed in footnote 2, above, the proposed writ of execution identifies the amount of the outstanding judgment liability in the amount of \$50,000,000 (Fifty Million Dollars). While the Judgment Debtors' liability is in excess of that amount, that figure gives the Judgment Debtors protection should the value of the residence at some point be applied to their judgment liability.

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

DATED: March 22, 2024.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

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Alexandra S. Grande
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Anne Henderson Haws

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 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:

Ammon Bundy
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- U.S. Mail
- Hand Delivered
- Overnight Mail
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aebundy@bundyfarms.com

Freedom Man PAC
Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
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/s/ Robert A. Faucher

Robert A. Faucher
for HOLLAND & HART LLP