Erik F. Stidham (ISB #5483) Robert A. Faucher (ISB #4745) Jennifer M. Jensen (ISB #9275) Zachery J. McCraney (ISB #11552) Anne Henderson Haws (ISB #10412) HOLLAND & HART LLP

800 W. Main Street, Suite 1750 Boise, ID 83702-5974

Telephone: 208.342.5000 Facsimile: 208.343.8869

E-mail: efstidham@hollandhart.com

rafaucher@hollandhart.com 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

AMENDED SUBPOENA FOR VIDEOTAPED 30(b)(6) DEPOSITION DUCES TECUM OF GLOBAL TRADING & INVESTMENTS INC. **STATE OF IDAHO TO:** Global Trading & Investments Inc.

c/o Joseph Chambers

jchambers@utahlawfirm.com

#### YOU ARE COMMANDED:

			4		
	to appear in the Court at the	nlace date a	nd time specified	d helow to testit	y in the above case
$\Box$	to appear in the Court at the	prace, date, a	na mne specime	a below to testil	y in the above case

to appear at the place, date, and time specified below to testify at the taking of a <u>videotaped deposition</u> in the above case in-person at the following location and date and time. For this Rule 30(b)(6) deposition duces tecum, Global Trading & Investments Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Global Trading & Investments Inc.'s behalf regarding the topics listed below. The person or persons designated must testify about information known or reasonably available to Global Trading & Investments Inc. See Exhibit A for Topics.

**PLACE:** Harris, Preston & Chambers, LLP 31 Federal Ave

Logan, UT

DATE/TIME: April 15, 2024 at 12:00 P.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 April 12, 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 12th day of April, 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	<ul> <li>☑ U.S. Mail</li> <li>☐ Hand Delivered</li> <li>☐ Overnight Mail</li> <li>☐ Email/iCourt/eServe:</li> </ul>
Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<ul> <li>☑ U.S. Mail</li> <li>☐ Hand Delivered</li> <li>☐ Overnight Mail</li> <li>☐ Email/iCourt/eServe:</li> </ul>
Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<ul> <li>□ U.S. Mail</li> <li>□ Hand Delivered</li> <li>□ Overnight Mail</li> <li>☑ Email/iCourt/eServe:</li> <li>aebundy@msn.com</li> <li>aebundy@bundyfarms.com</li> </ul>
Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<ul> <li>□ U.S. Mail</li> <li>□ Hand Delivered</li> <li>□ Overnight Mail</li> <li>☑ Email/iCourt/eServe:</li> <li>freedommanpress@protonmail.com</li> </ul>
Erik	rik F. Stidham F. Stidham IOLLAND & HART LLP

AMENDED SUBPOENA FOR VIDEOTAPED 30(b)(6) DEPOSITION DUCES TECUM OF GLOBAL TRADING & INVESTMENTS INC. - 4

#### **EXHIBIT A**

#### **Definitions**

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

The word "you," "your," or "yours," shall mean Global Trading & Investments Inc., and any person acting or purporting to act on its 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 you 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-husbondi Inc.
- 6. Please produce all documents and communications relating to your ownership interest, if any, in Abish-husbondi 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 16, 2022, check, Check No. 000101, from you to Abishhusbondi Inc. in the amount of \$6,000. **Exhibit 1**.
  - b. December 20, 2022, check, Check No. 000102, from you to Abishhusbondi Inc. in the amount of \$10,000. Exhibit 1. **Exhibit 2**.
  - c. February 13, 2023, check, Check No. 000104, from you to Abishhusbondi Inc. in the amount of \$5,465.84. **Exhibit 3**.
  - d. March 8, 2023, check, Check No. 000200, from you to Abish-husbondi Inc. in the amount of \$4,135.42. **Exhibit 4**.
  - e. April 5, 2023, check, Check No. 000203, from you to Abish-husbondi Inc. in the amount of \$4,145.42. **Exhibit 5**.
  - f. July 5, 2023, check, Check No. 000202, from you to Abish-husbondi Inc. in the amount of \$4,180. **Exhibit 6**.

- g. December 20, 2022, wire transfer from you to Abish-husbondi Inc. in the amount of \$3,000. **Exhibit 7** at 2.
- h. February 1, 2023, wire transfer from you to Abish-husbondi Inc. in the amount of \$5,465.84. **Exhibit 7** at 3.
- i. Wire transfer on or around June 6, 2022, from Abish-husbondi Inc. to you in the amount of \$120,000. **Exhibit 8**.
- 11. Please produce all documents and communications relating to the Campaign.
- 12. 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.
- 13. Please produce all documents and communications with any Defendant or Related Party relating to the Campaign, Abish-husbondi, or People's Rights Network between January 1, 2021, to present.
- 14. Please produce all documents and communications that relate to Ammon Bundy's personal use or retention of Campaign funds or donations.
- 15. Please produce Abish-husbondi 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).
- 16. Please produce all documents and communications relating to Abish-husbondi 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.
- 17. 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.
- 18. Please produce all documents and communications relating to offers to sell or purchase Abish-husbondi Inc.'s shares.
- 19. Please produce all documents and communications relating to the sales, transfers, or buybacks of Abish-husbondi Inc.'s shares of stock.
- 20. 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.
- 21. 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.
- 22. Please produce all documents and communications relating to your role in Abishhusbondi Inc. from March 1, 2022, to present.
- 23. 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.
- 24. Please produce all Minutes of all Directors' and Shareholders' meetings since Abish-husbondi Inc.'s formation in July 2019 to present.
- 25. Please produce all tax returns for Abish-husbondi Inc. for the years 2019 to present.
- 26. 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.
- 27. 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-husbondi Inc.'s monthly or annual cash balance generated since its formation in July 2019 to present.
- 28. Please produce all accounting and bookkeeping records for Abish-husbondi 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.
- 29. Please produce all documents evidencing Abish-husbondi Inc.'s capitalization (including subsequent capitalization) since its formation in July 2019 to present.
- 30. Please produce all corporate books and records not encompassed in the foregoing relating to Abish-husbondi Inc.

- 31. Please produce all documents and communications relating to loans to Abishhusbondi Inc.
- 32. Please produce all documents and communications evidencing or relating to Abish-husbondi Inc.'s Assets.
- 33. Please produce all documents and communications evidencing or relating to Abish-husbondi Inc.'s real estate transactions.
- 34. Please produce all documents and communications relating to correspondence with tenants of any real estate Abish-husbondi Inc. owns or controls including without limitation the Campaign and Emmett Door, Inc.
- 35. Please produce copies of all contracts and agreements between you and any Defendant or Related Party.
- 36. 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.
- 37. 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.
- 38. Please produce your organizational documents, including but not limited to your Articles of Incorporation and any amendments, Bylaws and any amendments, and any Operating Agreement(s).
- 39. Please produce documents evidencing your ownership, including the name of each person or entity who owns shares in your company.
- 40. Please produce documents evidencing your management, including the name of each person who manages your operations.
- 41. Please produce documents evidencing (a) the name of each of your directors, and (b) the name of each of your officers.

#### **Topics**

- 1. The identity, including name, address, and contact information, for any and all shareholders of Abish-husbondi Inc. since its formation in July 2019.
- 2. The identity, including name, address, and contact information, for any and all officers, directors, or employees of Abish-husbondi Inc. since its formation in July 2019.
- 3. All persons authorized to make expenditures on behalf of Abish-husbondi Inc.
- 4. The ownership, management, and control of Abish-husbondi Inc. since formation in July 2019.
- 5. Abish-husbondi Inc.'s operations.
- 6. Abish-husbondi Inc.'s Assets.
- 7. Abish-husbondi Inc.'s financials, including but not limited to its revenue, income, expense, profit, and loss from the time of formation in July 2019 to present.
- 8. The background and transactions culminating in the recording of the following deeds:
  - a. Warranty Deed, Instrument # 324137 Grantor(s): Ralph E. and Gladys L. Kellogg; Grantee: Abish-husbondi Inc. **Exhibit 9**.
  - b. Special Warranty Deed, Instrument # 325467 Grantor(s): GRH Glenwood LLC and C&J Idaho LLC; Grantee: Abish-husbondi Inc. Exhibit 10.
  - c. Personal Representative's Deed, Instrument # 328516 Grantor(s): Steve Eddy, General Personal Representative of the Estate of Donald L. Eddy aka Don Eddy, deceased; Grantee: Abish-husbondi Inc. **Exhibit 11**.
- 9. All sources of income for Abish-husbondi Inc. from July 1, 2019, to present and amounts of income received from such sources.
- 10. Abish-husbondi Inc.'s cash management practices since formation in July 2019.
- 11. Abish-husbondi Inc.'s relationship and correspondence with you, Ammon Bundy, Diego Rodriguez, People's Rights Network, Tom Branson, Rebecca Branson, and all Related Parties.

- 12. The circumstances surrounding the sale or issuance of shares of Abish-husbondi Inc. to any person or entity, including the circumstances surrounding the issuance of shares to you, Tom Branson, and Rebecca Branson.
- 13. Your ownership of Abish-husbondi Inc.
- 14. The identity, including name, address, and contact information, for any and all of you shareholders.
- 15. The identity, including name, address, and contact information, for any and all o your officers, directors, or employees.
- 16. The ownership, management, and control of your company.
- 17. The relationship, contracts, agreements, and correspondence between you and any Defendant or Related Party.
- 18. Your communications and transactions with any Defendant or Related Party.
- 19. The Assets of any Defendant or Related Party.

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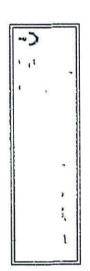
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Page: 4

Inc Abish-husbondi 1881 W. So Slope Rd Emmett, ID 83617

Redacted

12/20 Adjustment: - Wire Transfer/GLOBAL TRADING & INVESTMENTS INC/MONEY OWED

3000.00

Redacted

Wednesday, February 1, 2023 3:42 PM CT

324173422 - Clarity Credit Union

•

Reviewed By

Reviewed

Wire Status

Complete 02/01/2023 03:32 PM

Transaction #

5649

Wire Amount

\$5,465.84

W/D

Deposit

**Product Code** 

CTR

Sending FI ABA

292970825

Sending FI Name

**GLACIER BANK** 

Originator Account #

304200595

Originator Name

GLOBAL TRADING & INVESTMENTS INC.

Originator Address

1121 N 800 W

Originator Address

PRESTON ID 83263

**BNF Account #** 

324173422

**Beneficiary Name** 

CLARITY CREDIT UNION

Beneficiary Address

1822 N MIDLAND BLVD

**Beneficiary Address** 

NAMPA, ID 83651

ORG to BNF Information

FFC:ABISH-HUSBONDI INC4615 HARVEST LANEEMMETT, ID 83617ACCT # 1611572

Catalyst Corp Reference #

230201152931F200

imad #

20230201MMQFMPBM000335

omad#

20230201K1QJE01C00077502011629FT01

OFAC Check

**Not Active** 

Spor J. Ja

324173422 - Clarity Credit Union

Monday, June 6, 2022 10:34 AM CT

Reviewed By

N/A

Wire Status

In Progress

Transaction #

10134

Wire Amount

\$120,000.00

W/D

Withdrawal

Product Code

CTR

Receiver FI ABA

124301025

Receiver FI Name

Redacted

Originator Account #

Redacted

Originator Name

Abish-husbondi, Inc

Originator Address

1881 W. So Slope Rd

Originator Address

Emmett, ID 83617

BNF Account #

Redacted

Beneficiary Name

**GLOBAL TRADING** 

Beneficiary Address

17 EAST CENTER STREET

Beneficiary Address

LEWISTON, UT 84320

Beneficiary Reference #

Abish-husbondi,

Purpose of Payment

**TRANSFER** 

TranZact Initiated By

Redacted

TranZact Submitted By

Redacted

OFAC Check

Not Active

Fraud Service

Not Active

### **Instrument Detail Information**

Instrument#:	324137
Old Instrument#:	
Pages:	2
Instrument Date:	11/19/2019
Transaction Type:	180 WARRANTY DEED
Received From:	Pioneer Title Company of Gem Cou
Sec/Twn/Rng/Qtr:	5 /6N /1W /
Description:	SW CORNER SEC 5, T6N, R1W

### **Images**

Image Date	
11/19/2019	View Image

### **Grantors / Grantees**

Name	Туре
KELLOGG, RALPH E	R - Grantor
KELLOGG, GLADYS L	R - Grantor
ABISH-HUSBONDI INC	E - Grantee

#### Back to List

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### **Instrument Detail Information**



### **Images**

Image Date	
2/18/2020	View Image

### **Grantors / Grantees**

Name	Туре
GRH GLENWOOD LLC	R - Grantor
C & J IDAHO LLC	R - Grantor
ABISH-HUSBONDI INC	E - Grantee

#### Back to List

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### **Instrument Detail Information**



### **Images**

Image Date	
8/18/2020	View Image

### **Grantors / Grantees**

Name	Туре
EDDY, STEVE, PER REP	R - Grantor
EDDY, DONALD L ESTATE	R - Grantor
ABISH-HUSBONDI INC	E - Grantee

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