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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

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF JUDGMENT
CREDITORS' APPLICATION FOR
WRIT OF EXECUTION AS TO ALL
DEFENDANTS, EXCEPT AMMON
BUNDY**

I, Erik F. Stidham, declare and state as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. I am a partner in the Boise office of the law firm of Holland & Hart LLP and am licensed to practice law in the State of Idaho. Along with my colleagues identified above, I am counsel for Plaintiffs St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, the "Judgment Creditors"). I make this Declaration on behalf of the Judgment Creditors for the purpose of obtaining the issuance of writs of execution as to all of the above-captioned defendants, except Ammon Bundy, to the Ada County Sheriff, Canyon County Sheriff, and Gem County Sheriff in the above-entitled matter.

3. On August 29, 2023, this Court entered a Default Judgment in favor of 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").

4. 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:

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
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

5. The Default Judgment states that the Judgment Debtors are jointly and severally liable for the judgment. In addition, on August 29, 2023—the same day the Default Judgment was entered—this Court issued an Order on Verdict and Default Judgment. In that paper, the Court wrote that the Judgment Creditors “are entitled to have all damages owed to them to be collected jointly and severally from all Defendants.”

6. On October 29, 2023, my office filed a Declaration of Robert A. Faucher in Support of Judgment Creditor's Application for Writs of Execution (“10/29 Faucher Decl.”). Exhibit C of that declaration included a response filed by Ammon Bundy in a separate action (styled *St. Luke's Health System, Ltd., et al. v. Ammon Bundy, et al.*, Case No. CV23-23-0551, Third Judicial District

Court, State of Idaho, County of Gem) wherein Ammon Bundy declares that he and Lisa Bundy have been married for 22 years. *See* 10/29 Faucher Decl., Ex. C at ¶ 28.

7. As of the date of this Declaration, the Judgment Creditors have collected approximately \$2,002,797.55 of the Default Judgment, comprised of \$942.47 from a bank account controlled by Lisa Bundy, \$1,855.08 from a bank account controlled by Diego Rodriguez, and \$2 million that was credit bid at a sheriff's sale for stock in Ammon Bundy's former companies, Abish-husbondi Inc. and Dono Custos, Inc.

8. In addition, the Gem County Sheriff seized an RV that belonged to Judgment Debtor Diego Rodriguez. Judgment Creditors are working to resolve a third-party financing claim as to the RV, then the RV is expected to be sold. 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, no tax refunds have been received by Judgment Creditors. Finally, an Order was issued charging the individual interests of Judgment Debtor Diego Rodriguez in Power Marketing Agency, LLC and Power Marketing Consultants LLC ("Power Marketing LLCs") with the payment of the Default Judgment debt. While that Order directs the Power Marketing LLCs to pay to Judgment Creditors all present and future shares of income, profit, distribution, payments, revenues, and any other money or property that would, but for the Order, be paid to Judgment Debtor Diego Rodriguez, nothing has yet been paid to Judgment Creditors. Regardless, the writ of execution that Judgment Creditors seek in this action is in the amount of \$49 million so that the Judgment Debtors' interest in their assets is not prejudiced regardless of how the RV, the charging order lien, and any potential tax refund garnishments are (or are not) eventually applied to Judgment Debtors' liability.

9. The Default Judgment and the Order on Verdict and Default Judgment have been served on the Judgment Debtors as reflected therein.

10. No stay of execution exists as to any Judgment Debtor other than Ammon Bundy. A stay exists as to Ammon Bundy owing to the filing of a bankruptcy petition in the case *In re Ammon Edward Bundy*, Case No. 24-23530, United States Bankruptcy Court, District of Utah.

11. Judgment Creditors believe the Judgment Debtors may have assets in Ada County, Idaho, Canyon County, Idaho, and Gem County, Idaho.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

DATED this 16th day of June, 2025.

/s/Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June, 2025, 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
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
P.O. Box 1062
Cedar City, Utah 84712

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☒ Email/iCourt/eServe:
aebundy@bundyfarms.com

Ammon Bundy
896 E 400 S
New Harmony, UT 84757

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail - UPS
- ☐ 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

/s/ Erik F. Stidham

Erik F. Stidham
for HOLLAND & HART LLP