

Erik F. Stidham (ISB #5483)
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
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
ahhaws@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

**JUDGMENT CREDITORS'
APPLICATION FOR WRITS OF
EXECUTION AS TO ALL
DEFENDANTS EXCEPT AMMON
BUNDY (ADA COUNTY, CANYON
COUNTY, AND GEM 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

JUDGMENT CREDITORS' APPLICATION FOR WRITS OF EXECUTION AS TO
ALL DEFENDANTS EXCEPT AMMON BUNDY (ADA COUNTY, CANYON
COUNTY, AND GEM COUNTY) - 1

Writs of Execution as to all Defendants except Ammon Bundy (Ada County, Canyon County, and Gem County).

1. This Application is supported by the Declaration of Erik F. Stidham filed herewith (“Stidham 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 Creditors have collected approximately \$2,002,797.55 of the Default Judgment, exclusive of amounts provided in footnote 2 below, including \$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. The Default Judgment's current balance is approximately **\$49,872,202.40**, exclusive of post-judgment interest.²

² The Gem County Sheriff seized an RV that belonged to Judgment Debtor Diego Rodriguez, but the sheriff's sale has not yet taken place. The Judgment Creditors were issued a charging order against Diego Rodriguez's interests in certain limited liability companies, but nothing has yet been received by Judgment Creditors pursuant to that charging order. The amount stated in ¶ 5 above does not give the Judgment Debtors a credit for the value of the RV. *See* Stidham Decl., ¶¶ 7-8.

6. Ammon Bundy has filed a bankruptcy case: *In re Ammon Edward Bundy*, Case No. 24-23530, United States Bankruptcy Court, District of Utah. The petition date was July 17, 2024. The filing of a bankruptcy petition operates as an automatic stay under 11 U.S.C. § 362 as to Ammon Bundy. Thus, Judgment Creditors are not seeking a writ of execution as to Ammon Bundy at this time.

7. No stay exists for any Judgment Debtor other than Ammon Bundy.

Judgment Creditors Are Entitled to New Writs of Execution Notwithstanding that Prior Writs to the Same Counties Remain Outstanding

8. On April 17, 2024, Judgment Creditors filed a motion asking the Court to enter an order authorizing the Clerk to issue simultaneous writs of execution as to all Judgment Debtors and Lisa Bundy.

9. On April 19, 2024, the Court granted Judgment Creditor's motion. *See* Order Granting Motion for Order Authorizing Clerk to Issue Simultaneous Writs of Execution.

10. The Court's April 19 Order states that the "The Clerk of the Court shall issue new writs of execution to the Sheriff of Ada County and the Sheriff of Gem County should the above-captioned Plaintiffs show themselves entitled thereto in accordance with the Clerk's standard practices, notwithstanding that prior writs remain outstanding and the respective Sheriffs have not yet returned the prior writs." *Id.* at 2. Given this and the other statements herein, the Judgment Creditors are entitled to the issuance of new writs of execution, even if some remain outstanding.

Conclusion

11. The Judgment Creditors hereby apply for the issuance of three writs 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 except Ammon Bundy. Three proposed writs of execution against Judgment Debtors, other than Ammon Bundy, are submitted

JUDGMENT CREDITORS' APPLICATION FOR WRITS OF EXECUTION AS TO
ALL DEFENDANTS EXCEPT AMMON BUNDY (ADA COUNTY, CANYON
COUNTY, AND GEM COUNTY) - 4

herewith. Judgment Creditors believe that the Judgment Debtors may have assets in Ada County, Canyon County, and Gem County. In light of the issues addressed in footnote 2, above, the proposed writs of execution identify the amount of the outstanding judgment liability in the amount of **\$49,000,000** (Forty-Nine Million Dollars). While the Judgment Debtors' liability is in excess of that amount, that figure gives the Judgment Debtors protection should the value of outstanding collection activities be applied to their judgment liability.

WHEREFORE, Judgment Creditors apply for the issuance of three writs of execution in the forms submitted herewith.

DATED: June 16, 2025.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Anne Henderson Haws

Counsel for Plaintiffs

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