

Erik F. Stidham (ISB #5483)
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

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,

Defendants.

Case No. CV01-22-06789

DECLARATION OF CAMILLE LACROIX, MD, DFAPA IN SUPPORT OF MOTIONS FOR LEAVE TO AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES

I, Camille LaCroix, MD, DFAPA, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am the owner/operator of Forensic Psychiatry Services of Idaho, PLLC, in

Boise, Idaho.

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3. I am a board certified Psychiatrist and Forensic Psychiatrist licensed in the state of Idaho and in good standing.

4. I am a Distinguished Fellow of the American Psychiatric Association.

5. I am a professor of Psychiatry and have been accepted as an expert in this district court as well as many others in Idaho, as well as at the State and Federal levels.

6. I am an expert in the assessment of psychiatric issues in legal contexts, including causation and attribution of damages in tort claims.

7. I am providing this declaration regarding my opinions with a reasonable degree of medical certainty regarding the potential for emotional distress damages sustained by the plaintiffs, Ms. Tracy Jungman, NP and Dr. Natasha Erickson, MD.

8. Sources of information that I reviewed to date include the following documents and references:

- a. Amended Complaint and Demand for Jury Trial in this matter, dated 06/02/2022, including a sample of some of the many postings and statements made about St. Luke's, Dr. Erickson and Ms. Jungman.
- b. Draft Declaration of Natasha Erickson, MD and Tracy Jungman, NP in Support of Motion for Leave to Amend Complaint to Allege Punitive Damages;
- c. Counseling Records of Dr. Erickson from Julie Myers, LCPC at Boise Counseling Center, LLC, from 10/11/2022 to 10/19/2022;
- d. Interview of Tracy Jungman, NP by telephone on 11/07/2022 for 1.7 hours;
- e. Interview of Natasha Erickson, MD by telephone on 11/07/2022 for 1.12 hours;
- f. The Doxing Dilemma: seeking a remedy for the malicious publication of personal information, by Julia M. MacAllister. https://fordhamlawreview.org/wp-content/uploads/2017/03/MacAllister_April.pdf;
- g. Cyberstalking---what's the big deal? (From Controversies in Victimology, Second Edition, p 103-113, 2008, Laura J. Moriarty). <https://www.ojp.gov/ncjrs/virtual-library/abstracts/cyberstalking-whats-big-deal-controversies-victimology-second>
- h. U.S. Department of Justice Office of Justice Programs publication on Internet Safety: Cyberbullying and Cyberstalking Publications & Multimedia. Section on "Technology Safety & Privacy: A Toolkit for Survivors." <https://www.ojp.gov/feature/internet-safety/cyberbullying-and-cyberstalking>

- i. Centers for Disease Control Violence Prevention, Fast Facts: Preventing Stalking. <https://www.cdc.gov/violenceprevention/intimatepartnerviolence/stalking/fastfact.html>

9. I have also reviewed provided statements by Mr. Rodriguez that the intent of the protests and actions against the plaintiffs was to shame and hold the targets up to public scorn.

10. I have also been informed that the People's Rights Network is a network comprised of tens of thousands in number with a strong presence online and in Idaho.

11. Ammon Bundy is a high-profile figure who appears to have thousands of followers and has come to attention in Idaho for various acts including militant occupation of a federal wildlife habitat in Oregon, anti-masking campaigns and protests in Idaho, right to bear arms in schools and public places protests, and now the events listed here in this matter. He is also running for governor of Idaho with campaign signs and information posted publicly.

12. Dr. Erickson and Ms. Jungman were targeted by the defendants by Cyber Harassment (including Doxing), as well as Cyberstalking. They alleged that St. Luke's and these medical providers committed unspeakable and horrific crimes against children including kidnapping, child sexual trafficking, pedophilia, and even murder.

13. The actions of the defendants in this case included deliberate public release of the health care providers' private information to followers, which resulted in significant fear and emotional distress to the victims. Both victims reported needing to obtain private security systems for their homes, experiencing fear of verbal and/or physical assault in their workplaces and homes, and negative impact to their professional reputations.

14. The actions of the defendants are a version of stalking, which has well known and documented consequences including severe emotional distress. Per the Department of Justice, stalking is defined as "engaging in a course of conduct directed at a specific person that would

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cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress.” Cyberstalking is a version of stalking accomplished via technology.

15. The effects of Cyberstalking are outlined in the book chapter by Moriarty as follows: “the effects of cyberstalking can be as detrimental to the victim as those of traditional stalking. According to the National Center for Victims of Crime (2007), cyberstalking may result in changes in sleeping and eating patterns, nightmares, hyper-vigilance, anxiety, fear for personal safety, and a sense of helplessness.”

16. Per my review of the available information in this case, the nature of the threats to Dr. Erickson and Ms. Jungman were egregious and did in fact result in severe emotional distress.

17. Emotional distress can impact the person significantly; it is a real harm. Ironically, in the US OJP document regarding Cyberbullying and Cyberstalking, the “Survivor Toolkit” is noted to be for types of victims that the defendants are falsely accusing Dr. Erickson and Ms. Jungman to be, and reads: “This toolkit contains safety tips, information, and privacy strategies for *survivors of domestic violence, sexual assault, stalking, and trafficking related to the use of technology.*”

18. Emotional distress can have lasting impacts. In this case, the victims have not only personal safety concerns for themselves and family members but also professional implications that can last a lifetime. Professional licensing boards, future employers and potential patients “Googling” their new health care provider could all see these allegations on the internet for perpetuity.

19. Further, the actions of the defendants in this matter were to intimidate not only with their own words, but also the potential actions of others incited by their words on the internet, which could be acted upon at any time by any number of unknown and unnamed

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individuals that follow the defendants. This type of terror via the anonymity provided by Cyberstalking has no ending and the ongoing and indefinite potential to last a lifetime.

20. Examples of the significant impact to Dr. Erickson include that she “doesn’t park in the same place two days in a row” when going to work as a pediatric hospitalist at St. Luke’s hospital. She often works evenings and now must engage in the ritual of texting her husband that she has “arrived safely” at work and requests hospital security escorts to her car after work. She also reported scanning her environment constantly, avoiding large public gatherings for fear of being recognized by a PRN follower, nightmares and having to enter counseling. She scans the internet and websites where she has been targeted by the defendants regularly, most recently two days ago, and fears what the future holds professionally as a result of these patently false allegations and the doxing. Her husband and children have been impacted in various ways as well. Dr. Erickson also notes that “Bundy for Governor” campaign signs have been very distressing to her and her family and serve as a daily reminder of these events.

21. Examples of the significant impact to Ms. Jungman include that she has also worries about her personal safety and that of her family. She had her home address released by the defendants on the internet and has had significant distress and hypervigilance as a result. She described the distress of monitoring her home safety while also navigating her family coming and going, and this has been very distressing and confusing for her children. She also reports constantly scanning her new video surveillance to ensure “every inch of the house is covered.” She reports receiving treatment for depression as a result and is on antidepressant. She also reports avoiding crowds due to fear. She also stated that she now takes her hospital ID badge off as soon as she leaves the hospital or clinic to avoid any PRN followers recognizing her and attacking her. She stated she fears for future patients that may not get help due to the false

allegations about St. Luke's, the IDHW as well as the CARES program--all of which work to protect children from harm. She also notes that passing Bundy campaign signs daily while commuting to and from work is an extremely distressing reminder of her ordeal. Ms. Jungman also noted that one of the safety assessors that was also Cyberstalked and Doxed has left the hospital and moved out of state due to these events.

22. These threats against healthcare workers at any time would be terrifying and traumatic. However, these threats to a hospital system and dedicated champions of children who just came through the gauntlet of the COVID pandemic is particularly disturbing and disheartening.

23. Unfortunately, stalking is a public health epidemic of its own and affects millions of Americans. Research has shown that not only are there psychological effects but potential for victims of stalking to experience physical consequences including pain, poor health, injury, and chronic disease in the future.

These are my opinions based upon the information I have reviewed to date. I reserve the right to amend and update these opinions should additional information be provided. I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 7th day of November, 2022.



Camille LaCroix, MD, DFAPA

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Ammon Bundy for Governor
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:

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:

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:

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:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

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

- U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

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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
OF HOLLAND & HART LLP

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