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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**

<p>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,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p><b>SECOND AMENDED SUBPOENA FOR DEPOSITION DUCES TECUM TO CLARITY CREDIT UNION</b></p>
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**STATE OF IDAHO TO:** Clarity Credit Union  
c/o Wendy Edwards, its Registered Agent  
18880 S. Cobalt Point Way  
100  
Clarity Credit Union – Admin  
Meridian, ID 83642

**YOU ARE COMMANDED:**

- ☐ to appear in the Court at the place, date, and time specified below to testify in the above case.
- ☒ to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

Pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, Clarity Credit Union must produce for its deposition, one or more officers, directors, or managing agents, or other persons who are qualified to testify on its behalf as to each matter identified in **Exhibit A, Topics for the Deposition**.

**PLACE:** Holland & Hart LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702

**DATE/TIME:** Thursday, April 18, 2024 at 9:30 a.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.
- ☐ 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 9, 2024.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

Erik F. Stidham

Robert A. Faucher

Jennifer M. Jensen

Anne Henderson Haws

Zack J. McCraney

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 9th 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

- ☒ 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:

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](mailto:freedommanpress@protonmail.com)

Lisa Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

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

/s/ Robert A. Faucher

Erik F. Stidham  
OF HOLLAND & HART LLP

## EXHIBIT A

### Topics for the Deposition

1. The Currency Transaction Reports submitted by Clarity Credit Union with respect to Abish-husband Inc. on or about December 23, 2020, March 1, 2021, June 2, 2021, and September 24, 2021 (collectively, the “Currency Transaction Reports”).
2. The currency transactions that are the subject of the Currency Transaction Reports.
3. The documents produced by you on or about November 20, 2023, and on or about November 27, 2023, in response to a prior subpoena from the above-captioned Plaintiffs-Judgment Creditors (the “Documents”).
4. The transactions reflected in the Documents as follows: “Internet From- ; Src: 1-00 Dst: 1612161-SD-00.”
5. The transactions reflected in the Documents (the “Transactions”), including without limitation all oral representations from any member regarding the Transactions.
6. Any meetings between Ammon Bundy and any employee of Clarity Credit Union.
7. Any meetings between any representative of Bundy for Governor campaign and any employee of Clarity Credit Union, including without limitation any meeting involving the use of Account No. 1612161 by the Bundy for Governor campaign.

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