

Erik F. Stidham (ISB #5483)
Robert A. Faucher (ISB #4745)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
Anne E. Henderson (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
rfaucher@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

**DECLARATION OF ROBERT A.
FAUCHER IN SUPPORT OF
JUDGMENT CREDITORS' MOTION
FOR ORDER AUTHORIZING CLERK
TO ISSUE SIMULTANEOUS WRITS OF
EXECUTION AS TO ALL
DEFENDANTS AND LISA BUNDY
(ADA COUNTY AND GEM COUNTY)**

I, Robert A. Faucher, declare and state as follows:

1. 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 am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. I make this Declaration on behalf of the Judgment Creditors for the purpose of obtaining the issuance of simultaneous writs of execution as to all of the above-captioned defendants to the Gem County Sheriff and the Ada 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") that, among other things, 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**.

4. As of the date of this Declaration, the amount owing under the judgment is still in excess of **\$50,000,000**.

5. Writs of execution were issued to the Sheriffs of Ada County and Gem County on or about November 28, 2023 (the "Original Writs").

6. Pursuant to the Ada County Original Writ, the Ada County Sheriff levied on tax returns owing by the State of Idaho to Judgment Debtors. The Ada County Sheriff takes the position that (1) the levy on the tax refund remains enforceable under the Original Writ, (2) he

cannot engage in new collection activities under the Original Writ, and (3) were he to return the Original Writ now, he would lose the levy on the tax refunds.

7. Pursuant to the Gem County Original Writ, the Gem County Sheriff levied on, and took possession of, a motor vehicle of Judgment Debtor Diego Rodriguez. No Sheriff's sale has yet taken place because Idaho Central Credit Union ("ICCU") holds a perfected security interest in the motor vehicle. Judgment Creditors and ICCU are negotiating toward a resolution that would permit the Sheriff's sale to go forward. In the meantime, the Gem County Sheriff takes the position that (1) he can conduct the Sheriff's sale of the RV under the Original Writ, (2) he cannot engage in new collection activities under the Original Writ, and (3) were he to return the Original Writ, he would lose the levy on the motor vehicle.

8. Judgment Creditors do not want the Sheriffs to return the Original Writs now because Judgment Creditors will have lost the benefit of the levies without the property at issue being applied to reduce Judgment Debtors' liability. Essentially, Judgment Creditors would be starting over, and they would risk losing the assets forever.

9. Judgment Creditors believe Judgment Debtors may have assets in Ada County and Gem County.

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

DATED this 17th day of April, 2024.

/s/ Robert A. Faucher

Robert A. Faucher

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of April, 2024, 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 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:
<mailto:aebundy@bundyfarms.com>

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:

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

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

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

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

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

Ada County Sheriff
Civil Division
7180 Barrister Drive
Boise, ID 83704

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:
ascocivildivision@adacounty.id.gov

Gem County Sheriff
Civil Division
410 E. 1st Street
Emmett, ID 83617

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:
civil@co.gem.id.us

/s/ Robert A. Faucher

Robert A. Faucher
of HOLLAND & HART LLP

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