

# EXHIBIT D1



### Save Baby Cyrus

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#### Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](https://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

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**Save Baby Cyrus**  
January 2 · 🌐

Wishing you all an amazing 2024, filled with Gods favor and blessings!  
"Seek the Lord and his strength, seek his face continually, Remember his marvellous works that he hath done, his wonders, and the judgments of his mouth;"  
1 Chronicles 16:11-12



255 10 comments 5 shares

Like Comment Share

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**Sandra Kenslow**  
❤️  
11w Like Reply

Write a comment...

**Save Baby Cyrus**  
November 14, 2023 · 🌐

From Baby Cyrus' mom:

At the beginning of this year, we did a public records request for the Idaho Department of Health and Welfare (IDHW) records for Cyrus' records which we have the right to as his parents. Their response was that it would take too many hours of legal review to provide them for free, so we had to pay for the legal review. We tried to go back and forth on it, and Levi ended up paying the \$530 that they requested for legal review. They cashed the check and sent an email saying that they needed more than 10 business days to complete the legal review and that they'd have it ready by 11/9. IDHW records requests are not supposed to take more than 3 business days to be released, so that's why they had to send me a written notice that they would need longer (10 days).

11/9 comes and they have not sent the records, so I emailed them on 11/12 telling them that I haven't received the records yet. There was no response, so I call yesterday and talked to a lady at IDHW that says, "Sorry, they're not ready." I pushed her to check on the status, and she said she'd call me back the next day (today). I also followed up that call with another email. She did not call me back today, so I call again and the same lady says that the office has all come down with something and they've been slow. So, I asked for a new deadline, and she said she couldn't give me a new deadline or even a time estimate because it's "just a lot of documents."

It was left open ended, and they gave me no guarantee on when we will get these records. I suspect these records could have some important evidence that they don't want us to see, and they may be trying to cover it up or wait us out. They did this before when Levi tried to get the medical records from St. Luke's, and they wouldn't give the records over until he persisted in person and waited in the Saint Luke's waiting room for hours.

I'm afraid that if we don't aggressively follow up or make it public, that we may never get those records, or it may be a very long time from now.

I will keep calling in to demand the records, but I would truly appreciate it if some of my friends could also call Idaho Department of Health and Welfare and ask them to release the medical records of Cyrus Anderson to his parents who paid for them already. You can request to speak with the supervisor as well.

I believe IDHW has several different numbers you can call, but I called (208) 334-5700.

Thank you for helping!

68 16 comments 10 shares

Like Comment Share

View more comments

**Cynthia Ann**  
 There should be NO review. You have the right to those records, unredacted and in its entirety. Medical kidnapping is real. I pray you find strength and sue the hospital, idhw, and doctors who put you through this nightmare. Take a page from Maya. More... See more

18w Like Reply 15

**Leticia Mounir**  
 Cynthia Annthought of that movie on Netflix. Boy that family went thru 🙏!!!!

15w Like Reply 2

Write a comment...

**Save Baby Cyrus**  
 Reels · Oct 29 · 🌐



Cyrus lets very few people hold or hug him, but after seeing Stew Peters again after a year and a half, Cyrus immediately reached for him, hugging him... See more

by Newman · You've Go

Give!  
 128  
 10  
 4

**Save Baby Cyrus**  
 July 10, 2023 · 🌐

Prayers are needed right now.



**Ryan Bundy**  
 July 10, 2023 · 🌐

This is my little nephew, Woodrow. He's been on his death bed for the past two days. Our family has been blest by many miracles through the years and we are no... See more

👍❤️👍 240 52 comments

Like Comment Share

View more comments

**Sherry Redmon Mason**  
 🙏🙏🙏

25w Like Reply

Write a comment...

**Save Baby Cyrus** updated their profile picture.  
 July 13, 2023 · 🌐



138 7 comments

Like Comment Share

View more comments

Jackie Hunt  
Beautiful family...  
35w Like Reply

Write a comment...

Save Baby Cyrus updated their cover photo.  
July 13, 2023



18

Like Comment Share

Write a comment...

Save Baby Cyrus  
May 15, 2023

Cyrus is enjoying the cowboy boots his auntie Miranda got him for his birthday. He wears them all around the house and even tries to wear them to bed. He looks just like his daddy now! So cute!



313 26 comments 9 shares

Like Comment Share

View more comments

Oralla Orozco  
Precious little bundle of joy! Love and hugs to you kiddo  
45w Like Reply

Write a comment...

Save Baby Cyrus  
May 10, 2023

For everyone who has followed the Baby Cyrus case (and even those who are just learning about it), this is a very important virtual town hall to attend this evening.





**Ammon Bundy**  
May 10, 2023 · 🌐

You won't want to miss this!  
🔴 Happening TODAY — May 10th!  
👉👉👉

If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th.

Government Subsidized Child Trafficking  
Wednesday May 10th, 2023 9:00 PM Eastern Time  
Wednesday May 10th, 2023 8:00 PM Central Time  
Wednesday May 10th, 2023 7:00 PM Mountain Time  
Wednesday May 10th, 2023 6:00 PM Pacific Time

Join Zoom Meeting  
<https://us02web.zoom.us/j/82888844718...>  
Meeting ID: 828 8884 4718  
Passcode: 914511

👍❤️👤 106 11 comments 12 shares

👍 Like    💬 Comment    ➦ Share

View more comments



**Kristin White**  
I don't know you but my parents had me taken away when I was young also saying I was underweight. My parents did get me back but I was put in the hospital where they found out I was JUST a small child. I gained a whole three pounds. I'm sorry you are going through this

41w · Like Reply



Write a comment...



**Save Baby Cyrus**  
May 4, 2023 · 🌐

A year ago today! 🎉



**Save Baby Cyrus**  
May 4, 2023 · 🌐

👉 UPDATE!!! CASE DISMISSED!! 🎉  
Judge Fortier DISMISSED the case today and Baby Cyrus is finally free!! 🎉🎉🎉

No more court! No more CPS!! 🎉

The family says, "We have no words to express our heartfelt THANKS and GRATITUDE for everyone involved who has supported our family!" 🎉🎉🎉

Today is a glorious day! 🎉  
More info in this article and more to come!

[https://freedomman.org/\\_/arc\\_/baby-cyrus-case-dismissed/](https://freedomman.org/_/arc_/baby-cyrus-case-dismissed/)  
#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

👍❤️👤 247 18 comments 3 shares

👍 Like    💬 Comment    ➦ Share

View more comments

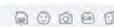


**Matt Lyrek**  
My wife and five children were kidnapped by the fraudulent government. CPS kidnapped my three step-children on January 6th 2023. I wouldn't comply with their unlawful demands so they succeeded in turning the wife against me and she was moving out.

On... See more  
46w · Like Reply



Write a comment...



**Save Baby Cyrus**  
May 1, 2023 · 🌐

Happy Birthday Cyrus!



**Marissa Anderson**  
May 1, 2023 · 🌐

Happy Birthday to our sweet little Cyrus! 🥳🥳🥳 His first birthday was spent still in the custody of the state, so this is such a blessing to celebrate our little guy in peace this year! Lots of reasons to give thanks today! We are so blessed!

We had a beautiful day spent as a family and I made Cyrus a special paleo chocolate cake. He was very excited about that! 🍰

We're so honored to be your parents, and I can't wait to see how God uses your life to glorify Him!

"Thus saith the LORD to his anointed, to Cyrus, whose right hand I have holden, to subdue nations before him; and I will loose the loins of kings...I will go before thee, and make the crooked places straight...that thou mayest know that I, the LORD, which call thee by thy name, am the God of Israel."  
Isaiah 45:1-3

👍❤️🎁 204 36 comments 3 shares

Like Comment Share

View more comments

**Kay Way**  
Happy Birthday, Cyrus !!! I hope You had A LOT OF FUN !!! ... God's Blessings for Your Health and Strength and for All Your Family and All of Ammon Bundy's Family to Prevail and to Prosper !!!

47w Like Reply

Write a comment...

**Save Baby Cyrus**  
April 9, 2023 · 🌐

Happy happy boy! 🥳🥳



👍❤️🎁 294 13 comments 3 shares

Like Comment Share

View more comments

**CaseyMargie Baker**  
Praise God for saving him!!! 🙏🙏🙏

50w Like Reply

Write a comment...

**Save Baby Cyrus**  
March 21, 2023 · 🌐

So serious 🤔



👍❤️🎁 398 53 comments 3 shares

Like Comment Share

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**Dominic Lets Go Brandon**  
Look how healthy he is with loving family around him.

1y Like Reply

Write a comment...

**Save Baby Cyrus**  
March 11, 2023 · 🌐

**This content isn't available right now**  
When this happens, it's usually because the owner only shared it with a small group of people, changed who can see it or it's been deleted.

👍❤️ 48 9 comments 6 shares

👍 Like    💬 Comment    ➦ Share

View more comments

**Pa-Ola Ola**  
you had never explained why the police claimed mom ,dad and aunt endangered a child . What they saw ? I don't get it

👍 Like    🗨️ Reply

Write a comment...

**Save Baby Cyrus**  
January 13, 2023 · 🌐

After ten months of fighting to get the cases dropped against Marissa, Levi, and Miranda it has finally happened! This new chapter is justice for Baby Cyrus, starting our lawsuits against the City of Meridian, The Idaho PD, Idaho Department Of Health and Welfare, and more. The Rodriguez's and Anderson's are moving forward in every way possible to make sure these systems are held accountable for the sake of our family and every families' rights.

🌐 <https://www.givesendgo.com/babycyruslegal...>

#justiceforbabycyrus  
#SaveBabyCyrus



GIVESENDGO.COM

**Click here to Give now to Lawsuits Connected to Baby Cyrus by Risa Rodriguez**  
Since the kidnapping of Baby Cyrus March 11, 2022, the Rodriguez-Anderson family has fought...

👍❤️ 167 19 comments 6 shares

👍 Like    💬 Comment    ➦ Share

View more comments

**Jean Slocum**  
GO Cyrus!!! Make em think twice before attacking another sick baby!!!!

👍 Like    🗨️ Reply

Write a comment...

**Save Baby Cyrus**  
December 19, 2022 · 🌐

Selfie game on point! 🤳👍



👍❤️ 368 23 comments

👍 Like    💬 Comment    ➦ Share

View more comments

**Bryan Brodeur**  
Who were the Evie cops who kidnapped your child? Are they in jail yet?

👍 Like    🗨️ Reply

Write a comment...

**Save Baby Cyrus**  
December 13, 2022 · 🌐

God is so good!

# CASE DISMISSED!



Marissa Anderson is with Levi Anderson and Sam Bishop.

December 18, 2022 · 🌐

CASE DISMISSED for Marissa Anderson.

After 9 long months, my criminal charges of "Resisting and Obstructing" have been dropped! That means all 3 cases in my... See more

Maura Woods and 770 others

53 comments · 19 shares

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Comment

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Leslie Rankin

Praise the Lord!

1y Like Reply

Write a comment...

🗨️ 😊 📷 📧 🗑️

Save Baby Cyrus

October 13, 2022 · 🌐

🌟🌟 The whole Baby Lily story: 🌟🌟

<https://miste4liberty.com/index.html>

Please share!! #BringBabyLilyHome

#ExposeCPS #Kids4Cash 🙏🙏

#Exp... See more

i

MISTE4LIBERTY.COM

[miste4liberty.com](https://miste4liberty.com)

Serra J. Frank Fight for Lilly Consulting & Advocacy

🗨️ 🗨️

1 comment · 5 shares

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Comment

Share

Kathy McKinney

Please Donate and Share to Any Friends And Family Who May Be Able To Help A Desperate Mentally Disabled Child Who has to Suffer Every Day. Please pray For Nathen Because His Life Will Be Very Difficult. We Apologize For Any Inconvenience! Please Help ... See more



GOFUNDME.COM

Nathen's Journey, organized by Kathy J McKinney

1y Like Reply

Write a comment...

🗨️ 😊 📷 📧 🗑️

Save Baby Cyrus

October 2, 2022 · 🌐

Health update from Baby Cyrus' mom...



Marissa Anderson is with Levi Anderson.

October 2, 2022 · 🌐

Baby Cyrus Health Update:

Baby Cyrus is making some progress this month! He is going 1-2 days longer in between his episodes which has helped him put on some more weight—huge win for him!

Although Cyrus still has C. DIFF, we had an amazing check up appointment with his pediatrician who went over all of Cyrus' lab reports from a stool and urine test and said basically just what our holistic doctor said. His test results show that his gut is in terrible condition and his C. DIFF just makes it worse.

She put him on an 8 step plan that takes 4-5 months and it's to eradicate C. Diff, heal the gut, and bring it into balance. We'll take all the tests again in 6 months to make sure he's fully healed.

No antibiotics needed. She said that one strain of antibiotics could take him up to 2 years to fix his gut from, so we're going the natural route.

I asked if we can do anything else about the vomiting for now, and she said that anyone who has a gut in this condition would be vomiting too. She said that his vomiting isn't a mystery to her, and it makes sense with how bad his gut is. But she thinks it'll all go away.

She said his weight looked amazing, he gained a perfect amount since his last visit, he grew a perfect amount in length, and she said his muscle tone was perfect. arm strength was perfect, and balance was perfect. She listened to his heart, checked his ears and his mouth, and said it was all PERFECT. She kept using the word perfect. She said, "He's doing great. He's absolutely a perfect boy. Follow the treatment plan and just enjoy him." 🥰🥰🥰

We're so glad it went so well and that she was very impressed with his weight gain!

She agreed with our holistic doctor's assessment, added a few more supplements, and will have us just watch him closely as he goes through the healing process.

We're still waiting on more genetic testing to see what else there could be as a root cause. It's always a waiting game with the genetics testing because they have us do one test at a time, then wait 6-8 weeks for results and order the next test and wait another 6-8 weeks. The good news is that his first test results came back normal, so the next test they ordered is a lot more extensive, and we're still waiting on that.

But for now, we're just going to enjoy Cyrus and his "perfection."

We feel SOOOOO good and encouraged that his appointment went so well! Thank you Jesus! We're so grateful! 💜💜💜

We will keep everyone updated. Thank you SO MUCH for your prayers and love!

P.S. Our family is safe from Hurricane Ian and are so grateful to have had little to no damage on our homes. Thank you all for checking in on us and praying for us! 🙏

P.P.S. Here is a cute video of Cyrus enjoying a walk on a beautiful sunny day after the storm!

👍👍👍 176 21 comments 10 shares

Like Comment Share

View more comments

**Ceil Hernandez**  
That's great news! Hope you all the best! He is such a cute little guy! Glad he is doing better!

Like Reply

Write a comment...

**Save Baby Cyrus**  
September 25, 2022



**Bring baby Lily home.**

September 23, 2022

Baby Lily was supposed to be adopted by her mother's cousins, Rachel & Trevor Templeton. THAT was the plan...

When she was born, in December 2021, she was remov... See more

👍👍👍 78 10 comments 13 shares

Like Comment Share

View more comments

**Andraea Thorn**  
#DefundASFA #ABOLISHCPS

Like Reply

Write a comment...

**Save Baby Cyrus**  
September 19, 2022



**Bring baby Lily home.**

September 19, 2022

#BringBabyLilyHome

#CyrusCPS #LilyCPS

#ExposeForcedAdoption  
#KootenaiCounty #Idaho

23

3 shares

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Write a comment...

Save Baby Cyrus

September 18, 2022



Free Robert Jones updated their cover photo.

September 18, 2022

[www.facebook.com/FreeRobertJones](https://www.facebook.com/FreeRobertJones)  
#FreeRobertJones

6

1 comment 1 share

Like

Comment

Share

Jason L Sawin

No of your posts came up, I just decided to look at the Save Baby Cyrus page to see how you are doing in FL. We have a lot of work to do.

1y Like Reply

Write a comment...

Save Baby Cyrus

September 16, 2022



Bring baby Lily home.

September 16, 2022

Baby Lily was supposed to be adopted by her mother's cousins, Rachel & Trevor Templeton. THAT was the plan...

When she was born, in December 2021, she was remov... See more

139

14 comments 24 shares

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Comment

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Mary Ann

Cps is all about child trafficking and money. Cps should honor the birth mothers wishes. They should not be involved. There is something cps is not disclosing. They need to have cps removed through the courts. This gave needs her family.

1y Like Reply

Write a comment...

Save Baby Cyrus

September 12, 2022





IDAHOSTATSMAN.COM

### Parents in child welfare case seek \$100,000 from Meridian for unlawful police treatment

414 50 comments 33 shares

Like Comment Share

View more comments

**Nelisa Carleton**  
\$8 million minimum. \$1 million everyday the parents were separated from their son!  
Like Reply

Write a comment...

**Save Baby Cyrus**  
August 21, 2022

Update from Baby Cyrus' mom...



**Marissa Anderson**  
August 21, 2022

August update on Baby Cyrus!

This last month has mainly just consisted of running tests on Cyrus. One of the test results showed that he tested positive for C. DIFF. (basically a bacteria infection in the colon). We can't know for sure how he got it, but his current doctor thinks it's possible that he picked up the infection during one of his hospital stays at St. Luke's. (Hospitals are one of the most common places where C. DIFF. is contracted.)

Most specifically, we were originally concerned when Baby Cyrus forced NG tube (that St. Luke's forced in him) fell out, and according to the "safety plan" that the Idaho Department of Health and Welfare (IDHW) made us agree to in order to get Baby Cyrus back, we had to return to the IDHW for them to put the NG tube back in. The nurse, Tracy Jungman, literally just grabbed the tube, which had been flopping around touching things and getting dirty, and shoved it back into this nose and down into his stomach. She didn't wear gloves, she didn't sanitize the tube, and she didn't switch the tube out for a new one, or anything that would seem obvious for sanitary purposes. We expressed our concern and she just played it off as if it was nothing. According to the American Association of Pediatrics, prolonged use of an NG tube is a common cause of C.DIFF. infection.

We have started some natural treatments for C. DIFF. and have a follow-up appointment this upcoming week to see if the treatment is working. Although we don't know if or how it is related to his Cyclic Vomiting Syndrome, we know it most certainly does not help to have this infection on top of everything he's dealing with health-wise.

We also finally got in with a geneticist, ran the first tests, and are waiting for results there. We're hopeful to find more answers.

Last month, Cyrus' doctor put him on a combination of supplements—CoQ10 and L carnitine, and his vomiting episodes were less severe but happening at the same frequency.

We took him off of the supplements for a few days while we were doing some of his tests, and he had one of his worst episodes in the last couple of months. We immediately put him back on the supplements, and his doctor added Riboflavin, which he thought would help (from what he could see on the latest test results) and Cyrus was doing much better. He went the longest he's ever gone in between episodes, the severity is down, and he's doing really well with weight gain this last month.

It seems that his vomiting is being spaced out more. We're very encouraged and hopeful to find more answers as we continue with testing, and his current primary doctor here in Florida has been absolutely amazing to work with. He seems to be taking us on the right path to find answers. We are grateful for him and for all the doctors and health specialists who have helped us along this journey.

This month has given us more hope, and we're so grateful to have Cyrus in our custody and be able to choose a more natural approach to his healing, which is proving to be a much better option for him. Without your help, support, love and concern, we never would have got Cyrus back in the first place. As we have learned, and as has been masterfully described in Stew Peter's documentary, "These Little Ones," our system in America is not designed to protect children nor to restore family unity. It does just the opposite.

Thank you to everyone for your care and concern for Cyrus, for reaching out to check up on him, and for your continued prayers, which have helped tremendously. We're so grateful for each and everyone one of you, and your messages absolutely mean the world to us!

Marissa Chavoys  
(Baby Cyrus's mom)

P.S. My court date for my criminal trial, where I am being criminally charged for "resisting and obstructing an officer," because I wouldn't give Baby Cyrus to Officer Steve Hansen who wanted to forcefully kidnap him from my hands, is still being actively fought. The next hearing has been delayed until October 6th. Please pray for our legal team that they can help us get this case rightfully dismissed. Imagine being charged criminally for not complying with someone who is illegally kidnapping your child! That is what is happening in this case. And I was always told that America was the "Land of the Free."

213 26 comments 14 shares

Like Comment Share

View more comments

**Sasha Mack Rodriguez**  
That's great that you are finding things that help him! And that you have custody and are able to find natural ways to help him.  
I hope you win the court case against the officer. Many of our freedoms have been lost when it comes to our children and ... See more  
Like Reply

Write a comment...

**Save Baby Cyrus**  
July 25, 2022

Baby Cyrus loves the sand at the beach! 🏖️  
#SaveBabyCyrus #StopCPS #endchildtrafficking



631 35 comments 6 shares

Like Comment Share

View more comments

**Gloria Urwin**  
So precious! He is where he belongs with his rightful parents & family. Poor baby should never been separated from his family in the first place. That was such an awful act of child kidnapping by Government! God is good 🙏

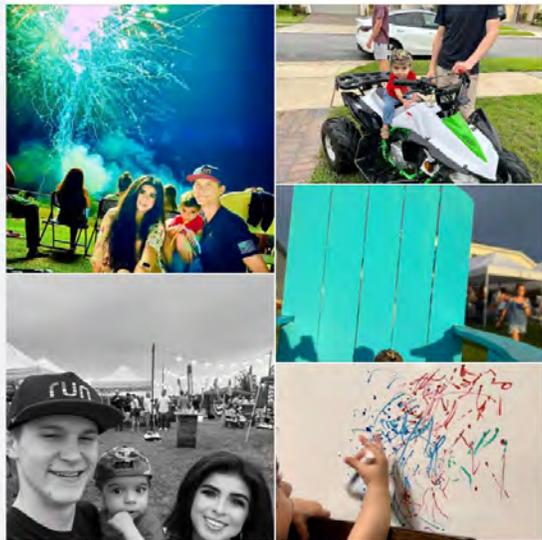
Like Reply

**Wanda Hosier**  
Gloria Urwin I totally agree!!

Like Reply

Write a comment...

**Save Baby Cyrus**  
July 4, 2022



192 8 comments 2 shares

Like Comment Share

View more comments

**Jeannette Hagar**  
Can anyone here give our family suggestions where to get help with our fight against CPS? We have been fighting for 17 months and are running out of time. 🙏

Like Reply

View all 2 replies

Write a comment...

**Save Baby Cyrus**  
June 30, 2022

Let me love you a little more before you aren't little anymore! ❤️❤️





294 9 comments 1 share

Like Comment Share

View more comments

Jaime Allison

Like Reply

Write a comment...

Save Baby Cyrus June 12, 2022



Marissa Anderson is with Levi Anderson. June 12, 2022

Health update on baby Cyrus: We've been getting a lot of messages from friends and supporters, asking for a health update on baby Cyrus, so I thought we'd update...

Maura Woods and 127 others 18 comments 6 shares

Like Comment Share

View more comments

Matt Byrd

Anything is curable. Don't believe the lie that something can't be cured. Please look in to Nutrition Response Testing. It's 100% non invasive and is 100% nutrition based. Healed my entire family of multiple "incurable" diseases. God is that good!

Like Reply

Write a comment...

Save Baby Cyrus June 12, 2022

A health update from baby Cyrus' mom....please pray for total healing!



Marissa Anderson is with Levi Anderson. June 12, 2022

Health update on baby Cyrus: We've been getting a lot of messages from friends and supporters, asking for a health update on baby Cyrus, so I thought we'd update everyone at once.

This is going to be a very raw and vulnerable post, but I feel it is important as our family can use a lot of prayer for our son.

Back in April, Cyrus was diagnosed with Cyclic Vomiting Syndrome by our family doctor and a GI doctor. Cyclic Vomiting Syndrome is a series of vomiting episodes and severe migraine that recur in a predictable pattern. Cyrus would be in an episode for several days, then he'd be 100% well for a few days, then get sick on the 4th day, lasting for several days. This repeated pattern is one that couldn't be broken even with medications that were prescribed (which made things worse), but Craniosacral therapy seemed to help shorten the days he was sick. He still got sick on every 4th day, but the Craniosacral therapy made it less severe. His doctors believed this to be a genetic issue, and something we can't cure, but only ease the symptoms and hope he grows out of it. During his CPS case, the doctors told the social workers that this was completely medical, the parents did nothing to neglect or abuse Cyrus and that there is no reason for CPS to be involved, but they continued to pursue the case—in spite of knowing that information.

Once the case was finally dismissed and our family relocated, we started researching more on Cyrus' condition, and looking for doctors who are familiar with it. We know WHAT he has, but we don't know WHY it is happening, or what the root cause is. The days that he's in his vomiting episodes are incredibly difficult and hands on for the entire family. Everyone, (many times including his grandparents, aunts and uncles), will drop everything to help care for him and make him as comfortable as we can. But during his days of being well, it's like he's never even been sick before. He gains weight so fast, eats anything he can get his hands on, has so much energy and is the happiest little baby you'll ever see.

We were referred to an amazing doctor who spotted an abnormality in his lab tests and pointed to the possibility of a Mitochondrial Disease. He believes Cyrus can have a possible mitochondrial defect, which would explain why his symptoms started so suddenly when he had zero signs of health complications from birth and in the first several months of his life.

After diving into the research on this disease, I found a study which concluded that 88% of

people with Cyclic Vomiting Syndrome have serious mitochondrial defects. The mitochondria are like little batteries for the body. They take food and oxygen and convert them into energy that the body needs to operate. When mitochondria cannot convert food and oxygen into life-sustaining energy, cell injury and even cell death follow. When this process is repeated throughout the body, organ systems begin to fail and even stop functioning.

Mitochondria exist in every cell of the body, and oftentimes when just very few mitochondria have defects, symptoms show way later in life, if at all. The earlier in life that symptoms manifest, the higher load of defected mitochondria there are. The bigger organs in the body contain more mitochondria, so often get affected first. For Cyrus, it seems to be primarily neurological and gastrointestinal.

This disease is not something widely understood by the medical field and the research on it is not as broad as most other diseases, but we have been researching everything there is to know on the matter.

Doctors have concluded that there is no cure, and in children with this disease (especially babies), they rarely survive past childhood.

We don't have an official diagnosis. Even if he is diagnosed with mitochondrial disease, maybe it will be a less severe case. Our current doctor has ordered more tests, including genetic testing to try and see exactly if and which mitochondria can be defective, and how.

We don't believe that our answers will come from traditional western medicine or the allopathic method of care. During two inpatient hospital stays at St. Luke's, that were both about 4 days long, they were never able to diagnose anything or give us any answers, but our family doctor gave him his first diagnoses of Cyclic Vomiting Syndrome on his first appointment, a diagnosis which another MD and Nurse Practitioner later agreed upon. Our new doctor was able to suggest we look further into mitochondrial defects and put him on these amazingly helpful supplements, also on the first appointment. Traditional allopathic hospitals have given us no help, only further confirming our already existing beliefs and knowledge on that. As most of you know, we had no choice on that last hospital stay for Cyrus.

Although we're glad to possibly be finding answers, learning all of this information has been incredibly disheartening. Even the slight possibility of our child having a life threatening disease with no known cure, is something you never think can happen to you. We are praying for God to lead us to the answers Cyrus needs, to know exactly what it is and to find a cure or a way to thrive with this.

We have prayed for guidance to find the right doctors and the right information during our research.

We pray often for miraculous healing. I told my husband that if a miracle is how Cyrus will receive healing, then it doesn't matter how severe or hopeless the diagnosis is, because nothing is too big for God, and nothing is out of His scope of power.

My husband anoints Cyrus with oil and we pray healing over him every night, and there is constant prayer throughout the day. Maybe God has a much bigger plan through this that we can't even see right now? Maybe this will just be a difficult journey that builds our faith and teaches us to depend on God completely. When the world tells you there is no hope, as Christian's, we know there is always hope through Christ, and it is in situations like this that we have nowhere else to turn.

God has brought us this far and we know He will never leave nor forsake us.

There is some good news and hope, though. After finding all of this information out, we prayed for direction, peace and a sign of hope. Our current doctor had Cyrus start on a combination of natural supplements that help support mitochondrial function, and after taking them for a day, he went into another episode the next day—on day 4, like he always does. We were pretty discouraged, but that evening, we saw a beautiful rainbow over our house. God's sign of hope. I remember seeing a huge rainbow the day before we got Cyrus back from CPS. We felt a boost of encouragement and that night, Cyrus' vomiting episode ended. In less than 12 hours. His shortest episode yet. Wow. This was the boost of encouragement we needed. Cyrus had so much energy and was so happy! He hasn't been on this supplement for very long, but we're hoping to see a change in his episodes moving forward! God has always given us hope right before a breaking point. He knows how much we can handle. What an amazing God we serve.

In conclusion, we are waiting to finish some more testing for Cyrus to see if there is a possible diagnosis, we will continue with the supplements he is on as we research more treatments and get connected with doctors who are experts in this area, and we are watching Cyrus gain weight very well. He is growing and enjoying his days when he is healthy and we are just spending as much time as possible with him as a family, building memories and soaking up every precious moment we have with him. Life is so precious and we want to treasure and enjoy it to the fullest. My dad always tells us that the only thing we take with us to heaven is our memories, so to invest into making good ones.

There is a lot of information we learned in the hours of research (I've been staying awake through most nights, reading through doctors studies, articles, scientific studies, reading through Cyrus' lab results and everything I can find on the matter), and it is too much to share the full explanation of his symptoms and everything we've learned, but if anyone has any experience with this diagnosis, symptoms, treatments, or know of good doctors, please let me know. We are open ears to learn everything there is to know and would appreciate any information you might have. We are willing to do anything and everything it takes to help our son. No matter the scope, no matter what it costs or what sacrifices we have to make to get him what he needs, we will do it in a heartbeat.

Thank you to everyone who took the time to read this all the way through. We have so much gratitude for all of you who have stuck with our family and continue to support us.

We ask for your prayers for our son and for our family as we navigate lots of life changes. For those who have asked what specifically they can pray for, prayers for strength, wisdom, guidance, peace, hope and emotional bandwidth are so needed and appreciated!

We love all of you as family!

\*here is a video of our family night out and Cyrus' first Hibachi experience! This was the day after he had his 12 hour episode.

145 24 comments 9 shares

Like Comment Share

View more comments

Sal Shiu  
Has he ever been treated for parasites? Myself and another mom I know have children with a similar problem and even though they tested negative for parasites, treating them for it alleviated their symptoms of constant uncontrollable vomiting. Not a sing... See more

Write a comment...

Save Baby Cyrus May 28, 2022

Baby Cyrus got invited to a fun swim day!  
He loves the water 🌊👦👧  
Thank you Lupita Martinez Espinoza for his little swim outfit!





314 16 comments 5 shares

Like Comment Share

View more comments

**Michael Griffin**  
Thank you for posting pictures of family.  
Fruit of our effort to protect and love.  
Best wishes.

Like Reply

Write a comment...

**Save Baby Cyrus**

May 29, 2022

Baby Cyrus got invited to a fun swim day!  
He loves the water! 🌊👦👶



112 6 comments 1 share

Like Comment Share

View more comments

**Deona Wittkopf**  
Looks warm where you are.

Like Reply

Write a comment...

**Save Baby Cyrus**

May 24, 2022

Just in case you need your heart melted today - rub a dub dub, Baby Cyrus in a tub! ❤️



500 31 comments 1 share

Like Comment Share

View more comments

**Deona Wittkopf**  
That's a cute tub  
Like Reply

Write a comment...

**Save Baby Cyrus**  
May 20, 2022 · 🌐

First Hair Cut! 🥰



337 31 comments 6 shares

Like Comment Share

View more comments

**Jeanie McCulley**  
Love seeing that little guy's smiling face  
Like Reply

Write a comment...

**Save Baby Cyrus**  
May 11, 2022 · 🌐

Can you say Virtue Signaling in an attempt to cover fraud? 🤔  
Donating the money to the same agency that is a part of the hospital and are the ones that really did make false statements? They lied. Now they wanna cover it up. Proof is in the medical records --> [www.fight4lilly.org/save-baby-cyrus](http://www.fight4lilly.org/save-baby-cyrus)  
#ExposeMedicalKidnap  
#SaveBabyCyrus



KT V8.COM  
**St. Luke's files lawsuit against Ammon Bundy and others, over 'intimidation, disruption'**

81 20 comments 5 shares

Like Comment Share

View more comments

**Maura Woods**  
The state paid for your bills. Why are you grifting \$100,000 from people who donated to pay the bills that were already paid?

Write a comment...

**Save Baby Cyrus**  
May 8, 2022 · 🌐



**Marissa Anderson**  
May 8, 2022 · 🌐

"A mother's love for her child is like nothing else in the world. It knows no law, no pity. It dares all things and crushes down remorselessly all that stands in its path."  
I believe motherhood is Gods greatest calling for a woman, what an honor it is to experience this blessing!  
I am so grateful to spend this Mother's Day with our son in full custody! God is so gracious!! 🙏🙏🙏  
Happy Mother's Day to all of you mama bears! To my mom—thank you for showing me a mothers love. You will never know how much I truly look up to you!!! ❤️❤️❤️❤️

360 22 comments 3 shares

Like Comment Share

View more comments

Sandra Kenslow

Like Reply

Write a comment...

Save Baby Cyrus  
May 4, 2022 · 🌐

👉 UPDATE!!! CASE DISMISSED!!! 🙌  
 Judge Fortier DISMISSED the case today and Baby Cyrus is finally free!! 🙌🙌  
 No more court! No more CPS!! 🙌  
 The family says, "We have no words to express our heartfelt THANKS and GRATITUDE for everyone involved who has supported our family!" 🙌❤️🙌  
 Today is a glorious day! 🙌  
 More info in this article and more to come!  
<https://freedomman.org/.../arc.../baby-cyrus-case-dismissed/>  
 #SaveBabyCyrus #MedicalKidnap #EXPOSECPS



1.3K 227 comments 324 shares

Like Comment Share

View more comments

Kathleen Iselin  
 Hallelujah! Praise God! This is answered prayer! NOW we need to keep praying and actively standing up for ALL babies, children, and people that are in the hands of the state, and/or are being trafficked/abused, and more. And I agree with Russan that ch... See more

Like Reply

Write a comment...



SAVE BABY CYRUS  
**#SaveBabyCyrus - Court Support**  
 This event was canceled

57 1 comment

Like Comment Share

StanleyJoni Helm  
 Praise the Lord

Like Reply

Write a comment...

Save Baby Cyrus  
May 2, 2022 · 🌐

Court is a week from TODAY... 5/9/2022  
 THIS is the evidence: [www.fight4liby.org/save-baby-cyrus](http://www.fight4liby.org/save-baby-cyrus)  
 What do you say? Nutritional neglect?  
 Or dismiss the case? 🙌🙌  
 If you choose the latter... 🙌🙌  
 Tell the judge by signing the petition - <https://www.change.org/p/dismiss-the-cyrus-anderson-case>  
 Or show up in person and make your voice heard through your presence at the courthouse - <https://fb.me/e/TRW1RZMg3>  
 Or BOTH 🙌  
 #SaveBabyCyrus #ExposeCPS #MedicalKidnap



# #SaveBabyCyrus

123 6 comments 9 shares

View more comments

Jasmine Welo Igguiden  
I have follow the case, read all about it 😭 it is never about the best for the child, but money and power. CPS dont care about the children, that is why they leave kids in horrible homes and with abusive parents, and take the kids from good homes to de... See more

Write a comment...

Save Baby Cyrus  
May 1, 2022



Marissa Anderson is with Levi Anderson.

A year ago today, a mighty warrior was born!  
Cyrus James Anderson, you were so wanted, prayed for, planned for and welcomed with so much love!  
I remember seeing those two pink lines on that pregnancy test, and as I cried on the bathroom floor with insurmountable amounts of joy, I thanked God for His answer to my prayer...for allowing me this opportunity to become a mother, my biggest dream since I was a young girl!  
Your entrance onto this earth was unforgettable, as you shot out with such force—the midwife was barely able to catch you and the heavens split open with intense thunder and lightning for a brief moment of that beautiful Spring day.  
Your name was chosen by your father, in the midst of a Bible study about King Cyrus, who's life's destiny was planned out by God himself, dad felt impressed upon him to give you that name, as he felt God had a specific plan and destiny for your life.  
"Thus saith the LORD to his anointed, to Cyrus, whose right hand I have holden, to subdue nations before him; and I will loose the loins of kings...I will go before thee, and make the crooked places straight...that thou mayest know that I, the LORD, which call thee by thy name, am the God of Israel."  
Isaiah 45:1-3  
God has a very special plan for you, son! You are loved more than any other child in this world and will continue to be loved immensely for the rest of your life.  
Thank you God for giving me the honor of being the mother to this treasure!  
Happy birthday my sweet Cyrus! You have brought so much joy to our family this last year. Your smiles, laughter and joyful spirit touch so many hearts!  
You are going to change the world! I love you more than life itself!  
"Before I formed thee in the belly I knew thee; and before thou camest forth out of the womb I sanctified thee, and I ordained thee a prophet unto the nations."  
Jeremiah 1:5 KJV  
Here is a video recap of his first year of life!

137 10 comments 6 shares

View more comments

Sandra Kenslow  
Happy birthday.

Write a comment...

Save Baby Cyrus  
May 1, 2022

Leave your birthday wishes for Cyrus on his Virtual Party event page!



SUN, MAY 1, 2022  
Baby Cyrus' 1st Birthday - Virtual Party  
Party · 147 people

7 1 comment

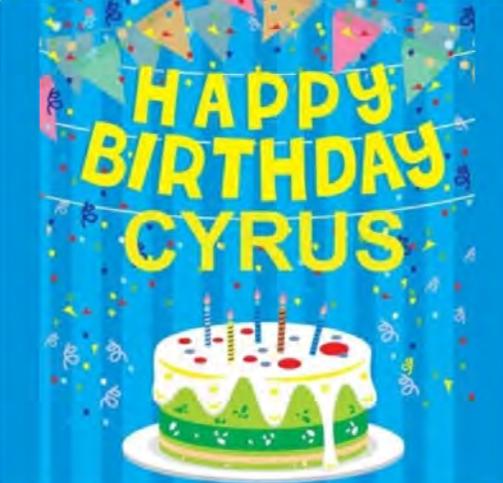
Like Comment Share

Kay Way  
HAPPY BIRTHDAY  
Dear Cyrus!!!  
HAPPY BIRTHDAY  
T... See more

1y Like Reply

Write a comment...

Save Baby Cyrus  
May 1, 2022



Serra Frank ▸ Baby Cyrus' 1st Birthday - Virtual Party  
May 1, 2022

49 2 comments

Like Comment

View more comments

Jackie Raymond



1y Like Reply

Write a comment...

Save Baby Cyrus  
May 1, 2022

Hope to see you today! ❤️



**TO BABY CYRUS  
1 YEAR BIRTHDAY PARTY**

SUN, MAY 1, 2022  
Baby Cyrus' 1st Birthday - In-person Party  
1 person went Interested

21

Like Comment Share

Write a comment...

Save Baby Cyrus  
May 1, 2022

Happy 1st Birthday to sweet Baby Cyrus!! 🥳



173 36 comments 1 share

Like Comment Share

View more comments

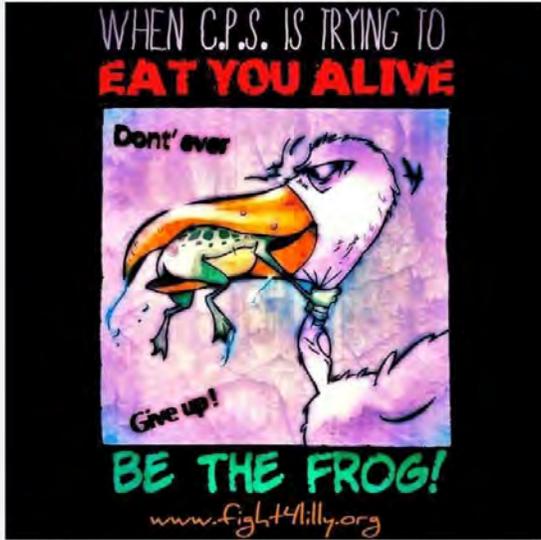
Jeannette Sv  
Happy birthday!!! ❤️❤️ I wish you all a great day ❤️

Like Reply

Write a comment...

Save Baby Cyrus  
April 30, 2022

<https://fight4lilly.org/save-baby-cyrus>  
#SAVEBABYCYRUS #MEDICALIDNAP



55 1 comment 1 share

Like Comment Share

Maria Pinero  
👍

Like Reply

Write a comment...

Save Baby Cyrus  
April 30, 2022

The family's Wish List - [https://www.amazon.com/\\_/birthday/3L7VTPZTV30ED/guest-view](https://www.amazon.com/_/birthday/3L7VTPZTV30ED/guest-view).

Save Baby Cyrus ▶ Baby Cyrus' 1st Birthday - Virtual Party  
April 24, 2022

The family's Wish List - [https://www.amazon.com/\\_/birthday/3L7VTPZTV30ED/guest-view](https://www.amazon.com/_/birthday/3L7VTPZTV30ED/guest-view).

AMAZON.COM  
Amazon Birthday Gift List  
[var r=e.createElement("script");r&&(r.type="text/javascript",r.text=a,e.body.a...),e.close(a)]

8 1 comment

Like Comment

Jackie Raymond  
Happy birthday Cyrus 🎉

Order placed, thank!

Shipping to Cyrus Anderson, 5000 Highway 66  
Mesa, AZ 85204 (default address hidden for privacy)

Saturday, May 7  
Estimated delivery

Like Reply

Write a comment...

Save Baby Cyrus  
April 29, 2022

Celebrate Baby Cyrus! 🎉



👍❤️👍 51 1 comment 2 shares  
Like Comment Share

Maria Pinero



1y Like Reply

Write a comment...

Save Baby Cyrus  
April 29, 2022

Based off of interviews with the family, and Cyrus's Complete Medical Records, family advocates at Fight for Lilly document the medical timeline that led to the wrongful kidnapping of Baby Cyrus. Judge the record for yourself...  
<https://fight4lilly.org/save-baby-cyrus>  
#MedicalKidnap #TheWorldsWatching #SaveBabyCyrus

### AN EMPIRICAL REVIEW OF A MEDICAL KIDNAPPING



SaveBabyCyrus

10 month old, Cyrus Anderson, is home with his parents, after enduring almost a week long medical kidnapping in March 2022 - at the hands of Child Protective Services and St. Luke's Children's Hospital in Boise, Idaho.

His parents, 21 year old Marissa, and 22 year old Levi, are left reeling in the aftermath of such a heart wrenching and intense battle for their baby boy.

👍❤️👍 32 1 comment 7 shares  
Like Comment Share

Odette M. Boyd

Yup, they take advantage of the vulnerable and the young parents like my nephew who was 24 and his wife 23 when their baby Cybelle was stolen by CPS in Lawton Oklahoma when she was only 9 weeks old. She is two now and although she is back with family m... See more

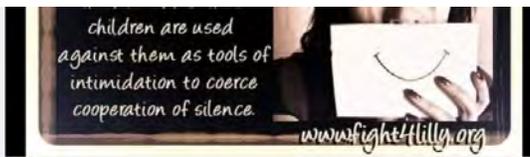
1y Like Reply

Write a comment...

Save Baby Cyrus  
April 29, 2022

Closed doors and gag orders breed Government Corruption!! #SAVEBABYCYRUS  
#MEDICALKIDNAP  
<https://fight4lilly.org/save-baby-cyrus>





20 7 shares

Like Comment Share  
Write a comment...

Save Baby Cyrus April 28, 2022

BABY CYRUS will turn 1 year old this Sunday, May 1st! We are going to have a celebration potluck at Tully Park in Meridian on Sunday, May 1st @ 5:00 pm. We will have #savebaby Cyrus t-shirts available. RSVP & Invite Your Friends - <https://fb.me/e/1MStfCEmf> If you can't make it in person, be sure to check out the virtual party - <https://facebook.com/events/3/baby-cyrus-1st-birthday-virtua/560731858728077/> Cyrus' 1st Birthday - Amazon Birthday Gift List - [https://www.amazon.com/\\_/birthday/3L7VTPZTV30ED/guest-view](https://www.amazon.com/_/birthday/3L7VTPZTV30ED/guest-view)



77 2 comments 4 shares

Like Comment Share

View more comments

Jeannette Hagar God bless you all. Sending prayers for your comfort and guidance from HIM 🙏

Write a comment...

Save Baby Cyrus April 28, 2022

Baby Cyrus belongs with his parents... Tell Judge Fortier to DISMISS THE CASE! PLEASE SIGN THE NEW PETITION & SHARE!! <https://www.change.org/DismissTheCyrusAndersonCase>



56 1 comment 5 shares

Like Comment Share

Cory Sem Signed! ✓

Write a comment...

Save Baby Cyrus  
April 28, 2022

"And you shall know the truth, and the truth shall make you free." ~ John 8:32 ~

SAVE BABY CYRUS: An Empirical Review of a Medical Kidnapping - <https://fight4lilly.org/save-baby-cyrus>  
#EXPOSECEPS #MedicalKidnap #SaveBabyCyrus



51

8 shares

Like

Comment

Share

Write a comment...

Save Baby Cyrus  
April 28, 2022

Baby Cyrus will celebrate his 1st Birthday on May 1st, 2022!! 🎂🎉🎊  
Help celebrate this special little boy by participating in this virtual Birthday Party!!  
❤️❤️❤️

Join the party - <https://www.facebook.com/events/560731858728077>



SUN, MAY 1, 2022

Baby Cyrus' 1st Birthday - Virtual Party

Interested

Party - 147 people

20

Like

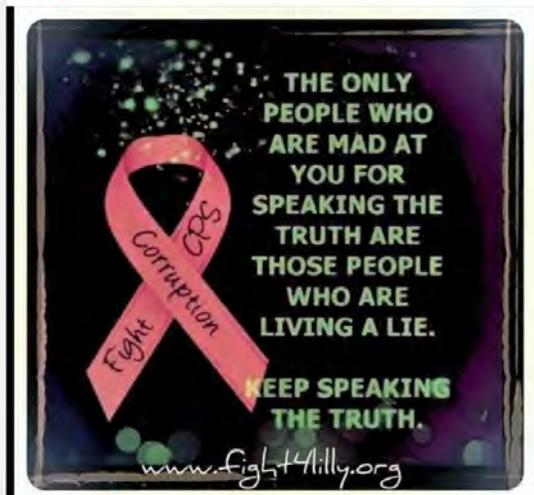
Comment

Share

Write a comment...

Save Baby Cyrus  
April 27, 2022

SAVE BABY CYRUS: An Empirical Review of a Medical Kidnapping - <https://fight4lilly.org/save-baby-cyrus>



48

1 comment 7 shares

Like

Comment

Share

Jeannette Haaz

There is a guy in Omaha who needs to read this. Derick Haynes we are going to expose you.  
1y Like Reply

Save Baby Cyrus  
April 27, 2022 · 🌐

Celebrate Baby Cyrus! 🎉  
In-person Party - <https://fb.me/e/67UCp8eFv>  
Virtual Party - <https://facebook.com/events/s/baby-cyrus-1st-birthday-virtua/560731858728077/>



👍❤️👍 130 3 comments 6 shares  
Like Comment Share

Save Baby Cyrus  
April 27, 2022 · 🌐

<https://healthfreedomidaho.com/the-corrupt-business-of-cps/>



HEALTHFREEDOMIDAHO.COM

**The Corrupt Business of CPS - Health Freedom Idaho**  
I used to believe, as most still do, that Child Protective Services only interfered in

👍👍👍 34 2 comments 2 shares  
Like Comment Share

View more comments

Roberta S. Grooms  
Major corruption!!!! We had our children taken back in '18 and neither my husband or I do drugs. They wanted us to do hair follicle tests after doing a UA. Knowing we were clean we said yes. The test results came back with extreme drugs supposedly in o... See more  
1y Like Reply

Write a comment...

Save Baby Cyrus  
April 26, 2022 · 🌐

Cyrus belongs with his parents and CPS needs to GO AWAY!! SIGN THE PETITION TO DISMISS THE CASE! 🙏🙏  
<https://www.change.org/p/dismiss-the-cyrus-anderson-case>



CHANGE.ORG

**Sign the Petition**  
Dismiss the Cyrus Anderson Case!

👍❤️👍 85 3 comments 6 shares  
Like Comment Share

View more comments

Cynthia Ann  
Signed. CPS needs to be abolished. They do far more harm than good.

1y Like Reply

Lisa Murkle Adams  
Cynthia Ann 100%

1y Like Reply

Write a comment...

Save Baby Cyrus  
April 26, 2022

What to do when CPS comes after you?  
LEARN YOUR RIGHTS & PROTECT YOUR FAMILY!

**Parental Rights**

When dealing with Child Protective Services  
**YOU HAVE RIGHTS!!**

You have the right to deny entrance into your home without a valid warrant.

You have the right to refuse to speak with anyone or allow access to your children without your attorney present.

You have the right to DUE PROCESS including a fair & impartial trial BEFORE you agree to do what they say.



**YOU HAVE THE RIGHT TO FIGHT BACK!**

150 8 comments 28 shares

Like Comment Share

View more comments

Kayla Haavisto  
And never cooperate, or sign safety plans/agreements which admit you are guilty of something!

1y Like Reply

Write a comment...

Save Baby Cyrus  
April 26, 2022

Help Celebrate Baby Cyrus' FIRST Birthday!! 🎂

Join his Virtual Birthday Party - <https://www.facebook.com/events/560731858728077>



**HAPPY BIRTHDAY**  
Cyrus

30 10 comments 2 shares

Like Comment Share

View more comments

Geraldine Blanco  
HAPPY BIRTHDAY CYRUS! HOPEFULLY YOUR FIRST PRESENT WILL BE FREEDOM FOR YOU, YOUR MOMMY AND YOUR DADDY!!! GOD BLESS YOU ALL!!! WE LOVE YOU!!!



1y Like Reply

Write a comment...

Save Baby Cyrus  
April 26, 2022

Based off of interviews with the family, and Cyrus' Complete Medical Records, family advocates at *Fight for Lilly* document the medical timeline that led to the wrongful kidnapping of Baby Cyrus.

Judge the record for yourself...

<https://fight4lilly.org/save-baby-cyrus>

# AN EMPIRICAL REVIEW OF A MEDICAL KIDNAPPING



#SaveBabyCyrus

58

1 comment 16 shares

Like

Comment

Share



Kameelah Jones

I understand what you went through. In 2018 my son was born premature due to a car accident that caused my labor.. he was born at 26 weeks in a racist hospital in Wisconsin. He had a 2 month stay in the NICU. I fought for him everyday. I went through a... See more

1y Like Reply Edited



Write a comment...



Save Baby Cyrus

April 25, 2022

Baby Cyrus belongs with his parents...

Tell Judge Fortier to DISMISS THE CASE!  
PLEASE SIGN THE NEW PETITION & SHARE!!

<https://www.change.org/DismissTheCyrusAndersonCase>



104

4 comments 17 shares

Like

Comment

Share

View more comments



Brenda Jackson  
Signed and shared

1y Like Reply



Write a comment...



Save Baby Cyrus

April 25, 2022





203 17 comments 5 shares

Like Comment Share

View more comments

Clarissa Childs Cormier So dang cute, I love it!! Praying for you all.

Geraldine Blanco Clarissa Childs Cormier-Billings PLEASE KEEP PRAYING. COURT DATE. 5/9 8:30AM IDAHO TIME. 🙏🙏🙏🙏🙏🙏

Write a comment...



427 24 comments 8 shares

Like Comment Share

View more comments

Amber Davis I just read through your story last night. It was very hard to read because my son was medically kidnapped for a week 2 years ago and they also called CPS on us. Our lawyer was able to shut them down immediately and we never had anything else happen an... See more

Write a comment...



SAVE BABY CYRUS #SaveBabyCyrus - Court Support This event was canceled

27

Like Comment Share

Write a comment...

Save Baby Cyrus April 24, 2022 Wish List for Baby Cyrus' 1st Birthday - Virtual Party Save Baby Cyrus » Baby Cyrus' 1st Birthday - Virtual Party

April 24, 2022

The family's Wish List - [https://www.amazon.com/\\_/birthday/3L7VTP2TV30ED/guest-view](https://www.amazon.com/_/birthday/3L7VTP2TV30ED/guest-view).



AMAZON.COM

### Amazon Birthday Gift List

`(function(){var r=document.createElement("script");r.type="text/javascript";r.text="a.e.body.a...";e.close(a)})(var r=document.createElement("script");r.type="text/javascript";r.text="a.e.body.a...");`

23

1 comment 1 share

Like

Comment



Brenda Morton Lochner

I am confused. If this is a wish list for Baby Cyrus, why are they requesting newborn size clothing for his 1-year-old birthday. Has someone hacked into their account?

Like Reply



Write a comment...

Write a comment...



Save Baby Cyrus

April 24, 2022

Based off of interviews with the family, and Cyrus's Complete Medical Records, family advocates at [Fight for Lilly](#) document the medical timeline that led to the wrongful kidnapping of Baby Cyrus.

Judge the record for yourself...

<https://fight4lilly.org/save-baby-cyrus>

#MedicalKidnap #TheWorldisWatching #SaveBabyCyrus

## AN EMPIRICAL REVIEW OF A MEDICAL KIDNAPPING



#SaveBabyCyrus

83

4 comments 71 shares

Like

Comment

Share

View more comments



Nancy Simmons Lucky

Prayers for all of you, heard your Dad talk last night 🙏❤️

Like Reply



Write a comment...

Write a comment...



Save Baby Cyrus

April 24, 2022

Based off of interviews with the family, and Cyrus's Complete Medical Records, family advocates at [Fight for Lilly](#) document the medical timeline that led to the wrongful kidnapping of Baby Cyrus.

Judge the record for yourself...

<https://fight4lilly.org/save-baby-cyrus>

#MedicalKidnap #TheWorldisWatching #SaveBabyCyrus

## AN EMPIRICAL REVIEW OF A MEDICAL KIDNAPPING



#SaveBabyCyrus

10 month old, Cyrus Anderson, is home with his parents; after enduring almost a week long medical kidnapping in March 2022 - at the hands of Child Protective Services and St. Luke's Children's Hospital in Boise, Idaho.

His parents, 21 year old Marissa, and 22 year old Levi, are left reeling in the aftermath of such a heart wrenching and intense battle for their baby boy.

100

21 comments 16 shares

Like Comment Share

View more comments

Author  
Save Baby Cyrus  
The link should be working now. If it's not, please let us know!  
<https://fight4lilly.org/save-baby-cyrus>

FIGHT4LILLY.ORG  
The Fight Against Corruption in Child Protective Services

Like Reply

Write a comment...

Save Baby Cyrus  
April 23, 2022

New petition to dismiss the case!  
PLEASE SIGN & SHARE!!  
<https://www.change.org/DismissTheCyrusAndersonCase>



CHANGE.ORG  
Sign the Petition  
Dismiss the Cyrus Anderson Case!

14 3 shares

Like Comment Share

Write a comment...

Save Baby Cyrus  
April 23, 2022

!! Cuteness Overload !!  
#SaveBabyCyrus



270 10 comments 2 shares

Like Comment Share

View more comments

Author  
Save Baby Cyrus  
Be sure to sign the new petition demanding Idaho close the case! Please sign & share!  
<https://www.change.org/p/dismiss-the-cyrus-anderson-case>

CHANGE.ORG  
Sign the Petition

Like Reply

Susan Maurillo Sims  
Save Baby Cyrus

Like Reply

Write a comment...

Save Baby Cyrus  
April 23, 2022

Just taking a little cruise...  
#SaveBabyCyrus





291 23 comments 14 shares  
Like Comment Share

View more comments

**Save Baby Cyrus**  
Be sure to sign the new petition demanding Idaho close the case! Please sign & share!! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



Like Reply Edited 2  
Write a comment...

**Save Baby Cyrus**  
April 23, 2022  
<https://freedomman.org/.../thank-you-message-from-levi-.../>

FREEDOMMAN.ORG  
**April 22nd - Thank You Message from Levi and Marissa | Freedom Man Press**  
Thank You Message from Levi and Marissa

76 5 comments 3 shares  
Like Comment Share

View more comments

**sharon Crockett**  
God Bless you all! 🙏

Like Reply  
Write a comment...

**Save Baby Cyrus**  
April 22, 2022

**Kidnapped by Child Protective Services: The Shocking Case of Baby Cyrus**  
A case in Idaho around baby Cyrus being taken from his family by Child Protective Services (CPS) is bringing attention to the financial incentives and extralegal powers states have when taking children from their parents.  
We spoke with the family and a lawyer involved in the state's seizure of baby Cyrus and found that in such cases, parents lose basic legal protections including the right to a jury and... See more



THEEPOCHTIMES.COM  
[Premiering 4/22, 7:30 PM ET] Kidnapped by Child Protective Services: The Case of Baby Cyrus

71 6 comments 23 shares  
Like Comment Share

View more comments

**Juan Alberto**  
ARIZONA it's the SAME, Baby Kidnapped by DCS

Like Reply  
Write a comment...

**Save Baby Cyrus**  
April 22, 2022  
Peek-A-Boo! 🙈  
#SaveBabyCyrus





327 16 comments 3 shares

Like Comment Share

View more comments

Author Save Baby Cyrus Be sure to sign the new petition demanding Idaho close the case! Please sign & share! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



1y Like Reply

Author Save Baby Cyrus Sherry Lee Bolender thank you!

1y Like Reply

View more replies

Write a comment...

Save Baby Cyrus April 21, 2022



273 22 comments 4 shares

Like Comment Share

View more comments

Author Save Baby Cyrus Be sure to sign the new petition demanding Idaho close the case! Please sign & share! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



1y Like Reply

Write a comment...

Save Baby Cyrus April 21, 2022



372 23 comments 3 shares

Like Comment Share

View more comments

Author Save Baby Cyrus Be sure to sign the new petition demanding Idaho close the case! Please sign & share! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



1y Like Reply  
Write a comment...

**Save Baby Cyrus**  
April 21, 2022

New petition to dismiss the case!  
PLEASE SIGN & SHARE!!  
<https://www.change.org/DismissTheCyrusAndersonCase>



CHANGE.ORG  
**Sign the Petition**  
Dismiss the Cyrus Anderson Case!

48 4 comments 28 shares  
Like Comment Share

View more comments

**Linda Foster**  
Signed

1y Like Reply  
Write a comment...

**Save Baby Cyrus**  
April 20, 2022

In case you need a reason for your heart to melt today... #SaveBabyCyrus



234 21 comments 1 share  
Like Comment Share

View more comments

**Wendy Liberty**  
Baby giggles are the best thing ever!!

1y Like Reply  
**Kim Seymour**  
Wendy Liberty I love their little bare feet too!

1y Like Reply  
Write a comment...

**Save Baby Cyrus**  
April 9, 2022



110 16 comments 1 share

Like Comment Share

View more comments

**Geraldine Bianco**  
PLEASE CONTINUE TO PRAY FOR THIS PRECIOUS BABY BOY & HIS FAMILY!!! IT'S NOT OVER YET! THEY POSTPONED THEIR COURT DATE from yesterday 4/8/22 to NEXT MONTH SOMETIME! CAN YOU BELIEVE THEY STILL HAVE TO GO TO COURT!!! PLEASE PRAY FOR THE FAMILY TO KEEP BAB... See more

Like Reply

Write a comment...

**Save Baby Cyrus**  
April 9, 2022 · 🌐  
#SaveBabyCyrus 🙏



He finally got his feeding tube taken out! The doctor said it wasn't doing him any good.

👍❤️🙏 990 72 comments 42 shares

Like Comment Share

View more comments

**Deborah Lynn Bonner**  
I hope y'all sue the mess out of that Dcs in civil courts. You can go after each police officer too. I'm sure you know this and I hope you do!

Like Reply

Write a comment...

**Save Baby Cyrus**  
April 6, 2022 · 🌐  
#SaveBabyCyrus #MedicalKidnap

#savebabycyrus  
freedomman.org/cyrus

👍❤️🙏 118 15 comments 53 shares

Like Comment Share

View more comments

**Mems Taylor**  
Is there not a update on yesterday court hearing?

Like Reply

Write a comment...

**Save Baby Cyrus**  
April 5, 2022 · 🌐  
#SaveBabyCyrus Show of Solidarity!  
Learn more & RSVP - <https://facebook.com/events/s/savebabycyrus-show-of-solidarity/937354060286674/>

Friday April 8, 2022 @ 2:00 pm

SHOW OF  
SOLIDARITY FOR  
BABY CYRUS

ADA COUNTY COURTHOUSE  
OUTSIDE OF JUDGE  
FORTIER'S COURTROOM



74 9 comments 12 shares

Like Comment Share

View more comments

Jeanie McCulley Prayers 🙏. God holds you in his hands. Feel His presence. Many in His army are linked arm and arm with you in this battle.

Write a comment...

Save Baby Cyrus April 5, 2022

#SaveBabyCyrus Show of Solidarity! Learn more & RSVP - https://facebook.com/events/savebaby Cyrus-show-of-solidarity/937354060286674/

121 10 comments 17 shares

Like Comment Share

View more comments

Author Save Baby Cyrus The time is at 2pm, instead of 1pm.



Write a comment...

Save Baby Cyrus April 4, 2022

Social workers are often guilty of fraud.. #SaveBabyCyrus #EXPOSECPSS



WFLA.COM Ex-Pasco County child protective investigator accused of falsifying reports A former Pasco County child protective investigator who allegedly falsified reports has been ar...

126 25 comments 26 shares

Like Comment Share

View more comments

Megan Corwin 1 in 4 children in foster care is abused. Use your platform to discuss that, most kids don't get to go home, so they go from maybe missing a meal to physical abuse with fosters.

Write a comment...

Save Baby Cyrus April 3, 2022

The PACT Rally LIVE in Nashville, Tennessee: https://www.facebook.com/rachelbrunospeaks/videos/234718392174691/





Rachel Bruno - Author & Public Speaker was live.  
April 3, 2022

31 2 shares  
Like Comment Share  
Write a comment...

Save Baby Cyrus  
April 1, 2022  
#SaveBabyCyrus #MedicalKidnap  
#EXPOSESEPS #Kids4Cash



HEALTHFREEDOMIDAHO.COM  
**The Corrupt Business of CPS - Health Freedom Idaho**  
I used to believe, as most still do, that Child Protective Services only interfered in

117 16 comments 33 shares  
Like Comment Share

View more comments  
Carol A Brown  
Would like to suggest that his neck might be out of alignment. Happened to my husband's nephew when he was a baby and he couldn't hold food down. An adjustment from their chiropractor solved the problem. Continuing to pray.  
1y Like Reply  
View all 6 replies  
Write a comment...

Save Baby Cyrus  
March 31, 2022  
Happy Baby Cyrus  
Happy with his family, right where he belongs.  
#SaveBabyCyrus



443 32 comments 20 shares  
Like Comment Share

View more comments  
Lauren Sanderson-Martinez  
If they're trying to prove he can sit up and crawl on his own, they might want to do it on the floor; a surface such as a bed completely dampens energy return.  
1y Like Reply  
Save Baby Cyrus  
Lauren Martinez they are just beautiful videos of a happy baby with his family  
1y Like Reply  
View more replies

Write a comment...

**Save Baby Cyrus**  
 March 29, 2022 · 🌐

Update #3... because yes...  
 #SaveBabyCyrus is THAT important and we will NEVER back down... THANK YOU!! ❤️  
 God Bless 🙏🏻🙏🏻🙏🏻 #CyrusArmy ❤️

**Marissa Anderson (Baby Cyrus)**  
 We are home! Thank you all so much! It brings us so much peace knowing we have an "army" out there ready to fight for baby Cyrus! God bless you greatly! 🙏🏻🙏🏻🙏🏻❤️

Now

👍❤️🙏🏻 295 11 comments 10 shares

Like Comment Share

View more comments

**Van like**  
 As a baby I had to have goats milk. I kept vomiting mothers milk and formula. My mom found a small polish grocery store that sold canned pasteurized goats milk. It was the only think that worked. When a friend had her baby, the baby kept vomiting. Dr. ... See more

1y Like Reply Edited

Write a comment...

**Save Baby Cyrus**  
 March 29, 2022 · 🌐

Double update... because Baby Cyrus is THAT special. 🙏🏻 He is home with his family where he belongs! Let's keep it that way! ❤️❤️❤️  
 #SaveBabyCyrus



👍❤️🙏🏻 350 18 comments 12 shares

Like Comment Share

View more comments

**Harlow Christine**  
 CPS is doubling down on making themselves look like the foolish tyrants they are. At this point they are just handing you the evidence you need to use against THEM.

1y Like Reply

Write a comment...

**Save Baby Cyrus is** 🙏🏻 feeling grateful in Boise.  
 March 29, 2022 · 🌐

UPDATE: Baby Cyrus has been discharged and is headed home with his parents where he belongs. Thank you so much for all of your continued support and prayers. You are very much appreciated in this fight to #SaveBabyCyrus ❤️

**Diego Rodriguez (Baby Cyrus)**  
 Baby Cyrus is out of the hospital! He's with Marissa and Levi and they are heading home!

Now

**Marissa Anderson (Baby Cyrus)**  
 One word to describe the whole thing....UNNECESSARY!

Now

👍❤️🙏🏻 528 79 comments 35 shares

Like Comment Share

View more comments

**Angela Miller Witte**  
 That social worker needs to step down a notch!

1y Like Reply

Write a comment...

**Save Baby Cyrus**  
March 29, 2022 · 🌐

Please stand by and send lots of prayers...  
❤️🙏❤️ #SaveBabyCyrus



**BE ON STANDBY! BE READY!**

**BABY CYRUS NEEDS YOUR HELP!**

CPS social worker is demanding that Levi & Marissa take Baby Cyrus back to the hospital even though his weight is above what it was when they last discharged him. It is possible this could be a trap & we ask that everyone be on high alert. We will keep everyone posted.

👍❤️🙏 573      172 comments 127 shares

Like      Comment      Share

View more comments

**Beth RiseAbove**  
Jessica Wilhelm blocked me, but I'm going to comment anyway because I don't appreciate my words being twisted. No, having a medical need is not a crime, obviously. The alleged "crime" here is the parents not addressing that medical need. Big difference... See more

👍 Like Reply

**Jenni Workman**  
Beth RiseAbove seems like it could be FPIES. We have all been following the news in my fpies support group. It's hard to get a diagnosis and it's not something many doctors or people are familiar with.

👍 Like Reply

View more replies

Write a comment...

**Save Baby Cyrus**  
March 28, 2022 · 🌐

Nashville!! ❤️

**P.A.C.T RALLY**

**People Against Child Trafficking**

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from families who have succeeded in getting their children back
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to protect your family!



Learn the details of the Baby Cyrus Medical Kidnapping Case

**Sunday, April 3rd @ 3:00pm**  
East Park Community Center (Theater)  
600 Woodland St. • Nashville, TN 37206

**babycyrus.com**

👍❤️🙏 164      9 comments 25 shares

Like      Comment      Share

View more comments

**Paula Nourse**  
Is this going to be Live Streamed for those that can't get to Tennessee?

👍 Like Reply

View all 3 replies

Write a comment...

**Save Baby Cyrus**  
March 27, 2022 · 🌐



320 6 comments 4 shares

Like Comment Share

View more comments

Jeannette Sv



1y Like Reply

Write a comment... [comment icons]

Save Baby Cyrus March 27, 2022 · [share icon]



HEALTHFREEDOMIDAHO.COM

### HB 821 Stop Medical Kidnap in Idaho - Health Freedom Idaho

Medical Kidnap is the wrongful removal of a minor or vulnerable adult from a parent

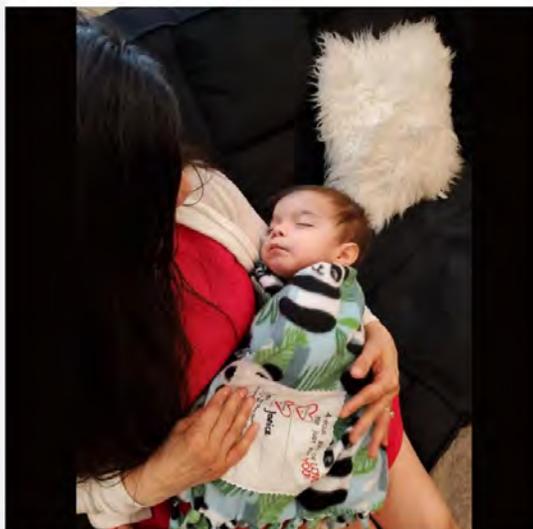
27 4 shares

Like Comment Share

Write a comment... [comment icons]

Save Baby Cyrus March 26, 2022 · [share icon]

Cyrus loves his Grandma! ❤️  
Safe & secure in the arms of his family. 🥰



451 10 comments 5 shares

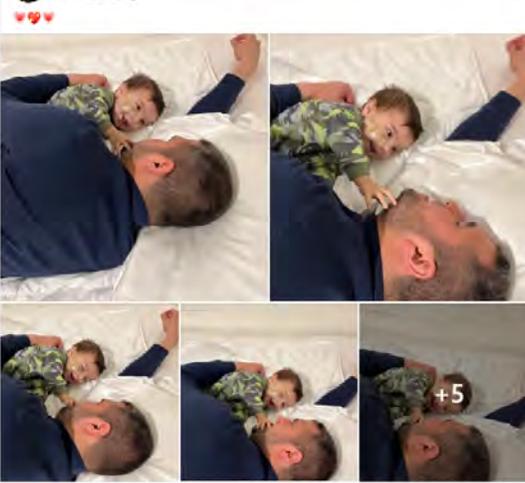
Like Comment Share

View more comments

Sisi Cotten DeAlgodon  
What a beautiful picture. I love that lady and that little boy. 🥰

2y Like Reply Write a comment...

Save Baby Cyrus March 26, 2022



305 17 comments 3 shares Like Comment Share

View more comments

Kimberly Burey Waigand I am overjoyed you got your baby back! God Bless and Protect your precious family

2y Like Reply Write a comment...

Save Baby Cyrus March 26, 2022



Marissa Anderson March 26, 2022

I've debated making this post, as the words needed to describe my feelings and gratitude are hard to find, but I will try my best. First, I want to express grat... See more

504 28 comments 49 shares Like Comment Share

View more comments

Angela Miller Witte We continue to pray for healing in Cyrus' body, and for answers to the puzzle of his digestion. May God's grace reveal in His time. We also continue to pray for the next court date. Matthew 18:10, "See that you do not despise one of these little ones.... See more

2y Like Reply Write a comment...

Save Baby Cyrus March 25, 2022 Tomorrow!

**LET'S MAKE A P.A.C.T. RALLY**

**PEOPLE AGAINST CHILD TRAFFICKING**

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from other Idaho families who have had their lives ruined and their children kidnapped by CPS
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to fight back against tyranny and protect your family!

**SATURDAY, MARCH 26TH @ 12:00 Noon**  
**800 E Locust St. • Emmett, ID 83617**  
**FreedomMan.org/cyrus**

**Save Baby Cyrus**  
March 21, 2022 · 🌐  
The address is now confirmed.  
Please share this flier and attend:  
People Against Child Trafficking (P.A.C.T.) Rally  
Saturday, March 26th @ 12:00 noon... See more

👍❤️👍 99 11 comments 17 shares  
Like Comment Share

View more comments  
Alicia Katy MagStife  
Thoughts & prayers for y'all tomorrow! #JusticeForBabyCyrus  
2y Like Reply

**Save Baby Cyrus**  
March 23, 2022 · 🌐  
Cyrus loves his Grandpa! 🥰  
So happy to be home!! 🥰



👍❤️👍 767 55 comments 10 shares  
Like Comment Share

View more comments  
Angela Miller Witte  
Remind us again of the next court date to be praying over?  
2y Like Reply  
Beth RiseAbove  
Angela Miller Witte April 8  
2y Like Reply

**Save Baby Cyrus**  
March 24, 2022 · 🌐  
Tell your legislators to vote yes on HB 821 🌟  
#StopMedicalKidnap #SaveBabyCyrus  
<https://healthfreedomidaho.com/hb-821-stop-medical-kidnap/>

#STOPMEDICALKIDNAP#SAVEBABYCYRUS

# STOP MEDICAL KIDNAP

EMAIL & CALL  
THE WAYS & MEANS COMMITTEE  
TO VOTE YES

## HB 821

HEALTH FREEDOM IDAHO  
Your Life. Your Health. Your Way.  
[healthfreedomidaho.com](http://healthfreedomidaho.com)

👍❤️👍 173 38 shares  
Like Comment Share

Save Baby Cyrus  
March 24, 2022 · 🌐

Tell your legislators to vote yes on HB 821  
#StopMedicalKidnap



HEALTHFREEDOMIDAHO.COM

**HB 821 Stop Medical Kidnap in Idaho - Health Freedom Idaho**

Medical Kidnap is the wrongful removal of a minor or vulnerable adult from a parent

👍❤️ 156 12 comments 37 shares  
Like Comment Share

View more comments

Bonnie Elizabeth Daily  
just fyi, the child prostitution services aka cps in placerville,california cant and shouldnt be trusted, they falseify and criminally make up cases and stories and slander and libel and defamation against parents to illegally and criminally sell and b... See more

2y Like Reply Edited 2  
Write a comment...

Save Baby Cyrus  
March 21, 2022 · 🌐



Fight for Lilly Consulting & Advocacy  
June 3, 2021 · 🌐

HOW TO OPEN YOUR DOOR TO CPS:  
#1: VIDEO RECORD  
#2: STATE THE FOLLOWING:  
The 4th Amendment of the United States Constitution states "the right of the people to b...  
See more

👍👍👍 52 14 comments 6 shares  
Like Comment Share

View more comments

Lynn Tere  
This happened to me 9 years ago and the CPS lady did not give me any warning that they were going to take my daughter away with a court emergency order. I did not answer my door to her at 7pm. And when she left well I went to see what she left in my do... See more

2y Like Reply 7  
Write a comment...

Save Baby Cyrus  
March 21, 2022 · 🌐

In 2008, Senator Nancy Schaefer wrote a scathing report to the Georgia State Assembly titled: The Corrupt Business of Child Protective Services

Protect your family by learning about the financial incentives the state receives through wrongfully removing loved children from good families. Learn why we need YOU to continue to help expose this issue and stand up for all children being used as currency for federal funding while in state "protective custody".

Read the report... See more



121 19 comments 55 shares

Like Comment Share

View more comments

Deborah Lynn Bonner  
Was an awesome woman ! We all know why she was killed !

Like Reply

Write a comment...

Save Baby Cyrus  
March 21, 2022

The address is now confirmed.  
Please share this flier and attend:  
People Against Child Trafficking (P.A.C.T.) Rally  
Saturday, March 26th @ 12:00 noon... See more

**LET'S MAKE A P.A.C.T. RALLY**



**PEOPLE AGAINST CHILD TRAFFICKING**

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from other Idaho families who have had their lives ruined and their children kidnapped by CPS
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to fight back against tyranny and protect your family!



Learn the details of the Baby Cyrus Medical Kidnapping Case!

**SATURDAY, MARCH 26TH @ 12:00 Noon**  
**800 E Locust St. • Emmett, ID 83617**

[FreedomMan.org/cyrus](http://FreedomMan.org/cyrus)

179 12 comments 90 shares

Like Comment Share

View more comments

Bonnie Elizabeth Daily  
just fyi, the child prostitution services aka cps in placerville,california cant and shouldnt be trusted, they falseily and criminally make up cases and stories and slander and libel and defamation against parents to illegally and criminally sell and b... See more

Like Reply

Write a comment...

Save Baby Cyrus  
March 21, 2022

#SaveBabyCyrus #medicalkidnap #EXPOSECPS #Kids4Cash

MEDICALKIDNAP.COM

**Baby Cyrus Back Home! Grandfather Announces Rally for Idaho Parents Who Lost Children to CPS - Medical Kidnap**

129 5 comments 13 shares

Like Comment Share

View more comments

Rochelle Ledbetter Robinson  
So glad he's back home where he belongs! I enjoyed your interview with Rick Green on Front Porch Live Sunday night.

Like Reply

Write a comment...

Save Baby Cyrus  
March 20, 2022

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

AFLDS.ORG

**Baby Cyrus returned to parents after Frontline News inquiry to CPS | America's Frontline Doctors**

Maura Woods and 371 others 75 comments 59 shares

Like Comment Share

View more comments

Danielle Parker  
The federal government should NOT be paying for foster care incentives to place

children in strangers homes. The feds don't do this for family placement, so why stranger? How about the feds get out of states business. Take away the incentives and watch... See more

2y Like Reply



Write a comment...



Save Baby Cyrus  
March 20, 2022 · 🌐

A thorough expose on the corruption found within Child Protective Services, written by former Texas CPS investigator/social worker - turned whistle blower - Carlos Morales. Protect your family!  
Get the book : [www.legallykidnapped.net](http://www.legallykidnapped.net)  
#ExposeCPS #medicalkidnap #Kids4Cash



VOLYTUBE.COM

Legally Kidnapped: The Case Against Child Protective Services

Legally Kidnapped: The Case Against Child Protective Services exposes the dangerous tactics a...

👍👍👍 97

18 comments 41 shares



Like



Comment



Share

View more comments



Mona Kay Blamires

Yes, this happened to my infant nephew who I fought for 18 months, had a court order to bring to Idaho from California but lost after extensive battle to foster family! It has now been 14 years and no update

2y Like Reply



↳ View all 5 replies



Write a comment...



Save Baby Cyrus  
March 20, 2022 · 🌐

#SaveBabyCyrus #medicalkidnap #EXPOSECPS

**LET'S MAKE A P.A.C.T. RALLY**



- Hear the story of Baby Cyrus's medical kidnapping
- Hear from other Idaho family's who have had their lives ruined and their children kidnapped by CPS
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to fight back against tyranny and protect your family!



Learn the details of the Baby Cyrus Medical Kidnapping Case

**SATURDAY, MARCH 26TH  
12:00 NOON - Location TBD**

[FreedomMan.org/cyrus](http://FreedomMan.org/cyrus)

👍👍👍 271

21 comments 55 shares



Like



Comment



Share

View more comments



Flower Power Following

2y Like Reply



Write a comment...



Save Baby Cyrus  
March 19, 2022 · 🌐

They said "Don't protest, it will rock the boat." The people protested anyway. And tipped the whole thing over. Thank you to everyone who took the time to protest the medical kidnapping of sweet Baby Cyrus. We couldn't have brought him home without you! ❤️



"Child of Concern Returned to Parents" from...

local.nixle.com

Full Notification

Entered By: [Meridian Police Department](#)

Entered On: Friday March 18th, 2022 :: 04:49 p.m. MDT

Advisory:

Child of Concern Returned to Parents

MERIDIAN POLICE DEPARTMENT

FOR IMMEDIATE RELEASE: March 18, 2022

CONTACT: Kelsey Johnston, Public Information Officer

Child of Concern Returned to Parents  
MERIDIAN- The baby amid the controversy over the last week due to an imminent danger declaration was returned to its parents today around noon. In these situations, the goal is to reunite the child to its parents as soon as it is healthy enough to be returned. Normally the parents agree to certain stipulations by the court. What those were or if there were stipulations is unknown.

There is no need to continue protesting or

703 173 comments 91 shares

Like Comment Share

View more comments

**Spike Cohen** Follow  
"There is no need to continue protesting"  
Not on this case, but we all just saw what happens when the people stand up against a government that went too far... See more  
2y Like Reply Edited 513  
View all 12 replies

Write a comment...

**Save Baby Cyrus** March 19, 2022



**Save Baby Cyrus** March 18, 2022  
Holding on tight to Mommy and Daddy

434 17 comments 11 shares

Like Comment Share

View more comments

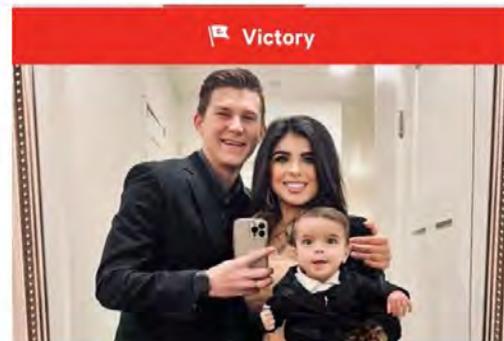
**Marcia Stott Ballard**  
Going to be in shock and processing trauma, maybe forever. You don't do this to a baby unless it's legitimately to protect him from actual abuse  
2y Like Reply 18

**Natalie Gier**  
**Marcia Stott Ballard** exactly!!! But our government is run by psychopaths circumventing the laws of the land  
2y Like Reply 3

Write a comment...

**Save Baby Cyrus** March 18, 2022

You did it! #SaveBabyCyrus is home with his family where he belongs. #MedicalKidnap Thank You!!! Please don't forget this happens. There are hundreds of thousands more children in this corrupt system that need you to remember... #EXPOSESCPS



# SEND BABY CYRUS HOME!

This petition made change with 5,333 supporters!

491 35 comments 60 shares  
Like Comment Share

View more comments

**Bridger Gaul**  
Thank you Jesus!! 🙏🙏🙏  
2y Like Reply

Write a comment...

**Save Baby Cyrus**  
March 18, 2022 · 🌐  
<https://medicalkidnap.com/.../idaho-lt-governor-calls-/>

MEDICALKIDNAP.COM  
**Idaho Lt. Governor Calls out Gov. Brad Little for Not Intervening in Baby Cyrus Medical Kidnapping Case - Medical Kidnap**

199 12 comments 20 shares  
Like Comment Share

View more comments

**Natalie Gier**  
It means he's involved!!! He's getting money to ignore the crimes!!!!  
2y Like Reply

Write a comment...

**Save Baby Cyrus**  
March 18, 2022 · 🌐



629 103 comments 34 shares  
Like Comment Share

View more comments

**Julia Swärt**  
The parents had already been taking little Cyrus for medical care & effectiveness of alternative feeding should have been the goal of doctors. Mother did recognize a problem & did everything possible in the meantime while worried for her baby. I'm worn... See more

2y Like Reply

Write a comment...

**Save Baby Cyrus** is 🥰 feeling grateful.  
March 18, 2022 · 🌐

A week after Baby Cyrus was forcibly removed from his parents by police, he has finally been returned home to his parents where he belongs!! Learn more at <https://freedomman.org/cyrus/>  
They couldn't have done it without all of you!! Thank you!! ❤️ The fight isn't over though. There is still an active CPS case, and cases in both family and criminal court. These parents still need your support. #SaveBabyCyrus... See more





Maura Woods, Kevin Stadther and 1.8K others 440 comments 686 shares

Like Comment Share

View more comments

Jennifer Wisniewski  
So excited! I know this is a tough road ahead, but with God's help and grace, you'll make it through. Praying for a complete healing in your little man and strength and wisdom for the both of you!

2y Like Reply Edited

Write a comment...



Save Baby Cyrus updated their website address. Learn more

106 14 comments 1 share

Like Comment Share

View more comments

Susan R. Mosby  
Can someone remind me the name of this doctor who reported this baby?

2y Like Reply

View all 6 replies

Write a comment...

Save Baby Cyrus  
March 17, 2022

We've reached 5,000 signatures! Haven't signed yet? Please do! And please continue to share. [www.change.org/send-baby-cyrus-home](https://www.change.org/send-baby-cyrus-home) #SaveBabyCyrus #sendbabycyrushome #medicalkidnap #EXPOSECEPS

✕ Petition · SEND BABY CYRUS HOME! · Change...  
change.org



### SEND BABY CYRUS HOME!

5,000 have signed. Let's get to 7,500!

At 7,500 signatures, this petition is more likely to get a reaction from the decision maker!

7 comments 38 shares

Like Comment Share

View more comments

Alyssa Jane  
How do I sign it? I can't find the link.

2y Like Reply

John Paul Jones  
Alyssa Jane <https://www.change.org/p/send-baby-cyrus-home>... See more



2y Like Reply

Write a comment...

Save Baby Cyrus  
March 17, 2022

Tell them what you think?

**Central District Health**  
5h · 🌐

The Panel provides an independent, citizen voice to the development and implementation of child welfare policies, procedures, and laws. The purpose of the Citizen Review Panel (CRP) is to evaluate and provide recommendations for the improvement of the child protection system.

For more information, please review the flyer and guidance document found here [www.cdh.idaho.gov/hl-d4citizen-panel.php](http://www.cdh.idaho.gov/hl-d4citizen-panel.php)

**Now Accepting!**

**Public Testimony Requests  
for the  
Region IV Citizen Review Panel**



The Panel wants to hear from Ada, Boise, Elmore and Valley County residents on their thoughts, experiences, and perspectives of the Idaho child welfare system.

The Panel is accepting written public comment. Requests to provide verbal public testimony will be reviewed.



Learn more at:  
[cdh.idaho.gov/hl-d4citizen-panel](http://cdh.idaho.gov/hl-d4citizen-panel)

👍❤️👍 90 16 comments 25 shares

👍 Like Comment ➦ Share

View more comments

**Danie Calderon**  
SPEAK UP IDAHO !!  
OR YOU WONT BE HEARD !!  
GIVE IT TO THEM STRAIT !!... See more

2y Like Reply

Write a comment... 🗨️ 📷 📹 📧 📧

**Save Baby Cyrus**  
March 17, 2022 · 🌐



**Marissa Anderson**  
March 17, 2022 · 🌐  
#SaveBabyCyrus

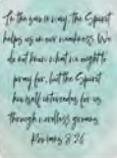
👍❤️👍 255 23 comments 11 shares

👍 Like Comment ➦ Share

View more comments

**Jennifer Lebel**  
Praying for baby Cyrus health and safety and praying for strength for mom and dad and family. Praying for light and transparency and for a righteous reunion.

2y Like Reply



2y Like Reply

Write a comment... 🗨️ 📷 📹 📧 📧

**Save Baby Cyrus**  
March 17, 2022 · 🌐





284 23 comments 20 shares

Like Comment Share

View more comments

Carol Lind  
Every child is different, this bs growth charts pediatricians use is generalized. It's all about natural inherent genes. I weighed 15 lbs at 1 year, always have had a very healthy appetite, could out eat most males and at my old age now I still eat wh...  
See more  
2y Like Reply

Save Baby Cyrus  
March 17, 2022



Miste Gardner-Karfeldt  
March 17, 2022

Here is a speech given by Sen Nancy Schaefer. This is the truth you need to know about cps. Read the comments, they will rip your heart out but you will learn ... See more

91 11 comments 16 shares

Like Comment Share

View more comments  
Jessica Stryker  
I am so very sorry that you have had to experience this system. This denial of truth and what is real is nothing short of psychological torture.  
2y Like Reply

Save Baby Cyrus  
March 17, 2022

#SaveBabyCyrus #sendbabycyruhome #medicalkidnap #EXPOSESECS  
MEDICALKIDNAP.COM  
Idaho Judge Sanctions Medical Kidnapping and Child Trafficking as Innocent Baby Suffers in State Care - Medical Kidnap

117 15 comments 60 shares

Like Comment Share

View more comments  
Pamela Aubrey Follow  
FL busted a previous judge yesterday in a huge human trafficking bust. The "Honorable" Daniel Peters of Cool County, IL. Wonder where he got his start.  
2y Like Reply

Save Baby Cyrus  
March 17, 2022





139 3 comments 3 shares

Like Comment Share

View more comments

Melody Watts  
I mean just one look and you can tell these people are amazing! Their countenance and strength is obvious. They government is being more and more exposed thru your suffering and you will win! #EXPOSECPS Governor Brad Little you need to fix this and g... See more

2y Like Reply

Write a comment...

Save Baby Cyrus  
March 17, 2022



507 54 comments 28 shares

Like Comment Share

View more comments

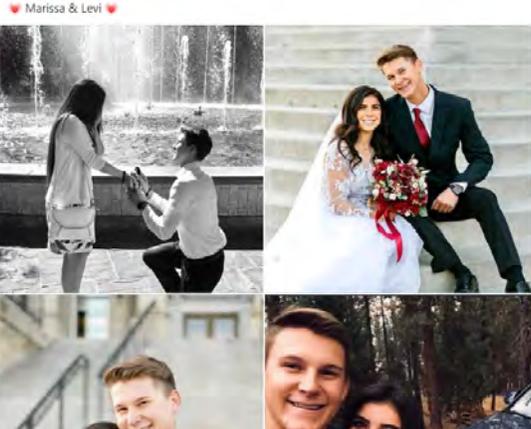
Guta Prado



2y Like Reply

Write a comment...

Save Baby Cyrus  
March 17, 2022





210 6 comments 6 shares

Like Comment Share

View more comments

**LaDawn Maness**  
I remember being your doula/childbirth educator and sensing the excitement and joy that you guys had on becoming parents. And I could feel the love you had for each other and your unborn Cyrus.

2y Like Reply 12

**Deborah tynn Bonner**  
LaDawn Maness your testimony may help being able to speak of how they listened learned and ask questions during pregnancy, Delivery and So forth. Something has to help! This is horrible. My daughter has been through it, finally got hers back but st... See more

2y Like Reply

View more replies

Write a comment...

**Save Baby Cyrus**  
March 17, 2022

This is the ONLY family approved fundraiser!



GIVSENDGO.COM

Click here to Give now to Save Baby Cyrus from Medical Kidnapping by Rick Green

118 5 comments 27 shares

Like Comment Share

View more comments

**Alyssa Jane**  
This is horrible! My son has FPIES, a severe vomiting reaction to certain foods that he is allergic to. He will vomit 8+ times until he becomes pale and sleepy and it took nearly 8 months to get a proper diagnosis because his pediatrician and allergi... See more

2y Like Reply 3

**Christen Braylee**  
Alyssa Jane same here!!! I really think his is FPIES ACUTE TO SHOCK like my little one has!!!!!!!

2y Like Reply 2

Write a comment...

**Save Baby Cyrus**  
March 17, 2022

Almost 5,000 signatures! Haven't signed yet? Please do! And please continue to share. #SaveBabyCyrus #sendbabycyrushome #medicalkidnap #EXPOSECPS



CHANGE.ORG

Sign the Petition

SEND BABY CYRUS HOME!

38 5 comments 16 shares

Like Comment Share

View more comments

**Angela Kristine**  
Signed a few days ago

2y Like Reply

Write a comment...

**Save Baby Cyrus**  
March 17, 2022





**Marissa Anderson**  
March 16, 2022 · 🌐  
This song so well represent the calling of my son, Cyrus.  
🎵 I'm the one, my time has come  
I came to earth with promises to fill... See more

👍❤️🗨️ 199 17 comments 12 shares

👍 Like 🗨️ Comment ➦ Share

View more comments

**Amy Mccamy**  
Is there a way to share on my telegram channel without being an fb link.  
2y Like Reply

Write a comment... 🗨️ 📷 📺 📧 📧

**Save Baby Cyrus**  
March 17, 2022 · 🌐  
#SaveBabyCyrus #SendBabyCyrusHome  
#MedicalKidnap #EXPOSECPS

📖 This is what the LORD says:

“I will go before you, Cyrus,  
and level the mountains.”

I will smash down gates of bronze  
and cut through bars of iron.

And I will give you treasures  
hidden in the darkness—  
secret riches.

I will do this so you may know  
that I am the LORD,  
the God of Israel, the one who  
calls you by name.

👍❤️🗨️ 333 50 comments 22 shares

👍 Like 🗨️ Comment ➦ Share

View more comments

**Pamela Aubrey** Follow  
Luke 17:2  
“It were better for him if the millstone of a donkey were hung on his neck and he were cast into the sea than that he would subvert one of these little ones.”  
2y Like Reply

Write a comment... 🗨️ 📷 📺 📧 📧

**Save Baby Cyrus** is 🥺 feeling heartbroken at **Ada County Courthouse**.  
March 16, 2022 · 🌐  
Court update: Judge Laurie Fortier DID NOT send Baby Cyrus home at Shelter Care. ❤️🥺  
Now it's time to fight to bring him back to his parents where he belongs. Next hearing will be in a month. More details will be posted soon. Stay tuned... #SaveBabyCyrus #MedicalKidnap #ExposeCPS #SendBabyCyrusHome

👍❤️🗨️ 403 500 comments 123 shares

👍 Like 🗨️ Comment ➦ Share

View more comments

**Lindsey Grubbs**  
I think it is just awful what they are doing to you and baby boy. But I did read something about him not having a bowel movement for 2/3 days after he was kidnapped and asking for an enema. Fully breastfed babes can safely go 10 days without a bowel mo... See more

2y Like Reply

Write a comment... 🗨️ 📷 📺 📧 📧

**Save Baby Cyrus**  
March 16, 2022 · 🌐

APFDS.ORG

Medical Kidnapping? Breast milk-dependent infant deteriorates in state custody | America's Frontline Doctors

175

45 comments 104 shares

Like

Comment

Share

View more comments



Martha Rodriguez

Baby Cyrus was a happy baby on Friday, March 12. On Sunday March 13 he looked limp. Someone at St. Luke's needs to step forward. CPS should be investigated for child cruelty.

2y Like Reply



Write a comment...



Save Baby Cyrus

March 18, 2022

3,600+ have signed!! Have you? Let's get to 5,000 today! Please sign & share! [www.change.org/SendBabyCyrusHome](http://www.change.org/SendBabyCyrusHome)



SEND BABY CYRUS HOME!

3,633 have signed. Let's get to 5,000!



At 5,000 signatures, this petition is more likely to get picked up by local news!

113

18 comments 94 shares

Like

Comment

Share

View more comments



Nana Rose

Signed from Illinois

2y Like Reply



Write a comment...



Save Baby Cyrus

March 15, 2022



Steph Black

March 15, 2022

It's time for baby Cyrus to come home today. It's time to expose these thugs for who they are, liars and kidnapers. It's time to show the naysayers and the ... See more

237

22 comments 32 shares

Like

Comment

Share

View more comments



Dustin Dickson

He is the cutest kid! I'm so happy you guys got him back!

2y Like Reply



Write a comment...



Save Baby Cyrus

March 15, 2022

Some photos of Cyrus while in state's care



👍👍👍 279 62 comments 71 shares

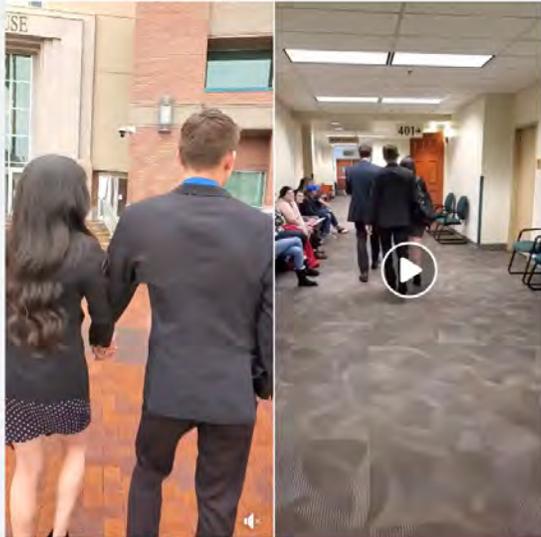
Like Comment Share

View more comments

- Maureen Elizabeth**  
He had to be rehydrated with IVs. Neglectful parenting will cause that, Thankfully we the tax payers will be paying the bills to get this child healthy.  
2y Like Reply
  - Save Baby Cyrus** (author)  
... or, another perspective, paying the bills for CPS to kidnap innocent children from loving parents... the truth will prevail. ❤️  
2y Like Reply
- View more replies
- Write a comment...

**Save Baby Cyrus** is feeling angry at **Ada County Courthouse**.  
March 15, 2022

Court update: Magistrate Judge Laurie Fortier  
No one was allowed into the courtroom except the parents and only one of their attorneys. The judge denied the request for the 2nd attorney to be present.  
Bailiffs guarded the door. Others guarded the elevators. Officers wandered the halls. Supporters were prohibited from recording or taking photos per administrative order preventing recordings on the 4th floor. Why?!?!... [See more](#)



👍👍👍 138 93 comments 46 shares

Like Comment Share

View more comments

- Kayla Haavisto**  
You guys are going through what so many parents go through nation wide; medical kidnap. It's only gotten worse since Covid. My husband Tim and I have worked on these cases for years. We used to live in Idaho and attended several rallies with you guys a... [See more](#)  
2y Like Reply Edited
- View all 9 replies
- Write a comment...

**Save Baby Cyrus**  
March 15, 2022

1,234 have signed!! Have you? Let's get to 2,000 by its time for court? Please sign & share!  
[www.change.org/SendBabyCyrusHome](http://www.change.org/SendBabyCyrusHome)  
[#SaveBabyCyrus](#) [#MedicalKidnap](#) [#EXPOSECPS](#)





## SEND BABY CYRUS HOME!

1,234 have signed. Let's get to 1,500!



142

36 comments 81 shares

Like

Comment

Share

View more comments

Cory Sem  
So so close!



2y Like Reply

Write a comment...



Save Baby Cyrus

March 15, 2022 · 🌐

Marissa & Levi ❤️



175

19 comments 11 shares

Like

Comment

Share

View more comments

Marla Prandini Watkins  
Your family is an inspiration. ❤️

2y Like Reply

Write a comment...



Save Baby Cyrus

March 15, 2022 · 🌐

Marissa and Levi ❤️





103 likes 1 comment 2 shares

Like Comment Share

Kellie Blum  
Beautiful

2y Like Reply

Write a comment...

Save Baby Cyrus  
March 14, 2022

FREEDOMMAN.ORG  
**Baby Cyrus Was Kidnapped! | Freedom Man Press**  
Baby Cyrus Was Kidnapped!

43 likes 10 comments 19 shares

Like Comment Share

View more comments

Daby Moore  
Baby cyrus was saved. Big difference.

2y Like Reply

View all 4 replies

Write a comment...

Save Baby Cyrus updated their cover photo.  
March 14, 2022



102 likes 12 comments 3 shares

Like Comment Share

View more comments

Daby Moore  
Get a job, abuser! 🤔

2y Like Reply

View all 8 replies

Write a comment...

Save Baby Cyrus is feeling pissed at St Lukes Downtown  
March 14, 2022 · Boise

🌟 Baby Cyrus Press Conference 🌟  
6 PM TODAY at Boise St. Luke's. Details that you need to know. Help Save Cyrus! #SaveBabyCyrus #MedicalKidnap #EXPOSECPS



HOSPITAL  
St Lukes Downtown

75 likes 6 comments 8 shares

Like Comment Share

View more comments

Lindsey Grubbs  
Have they checked for a bowel obstruction? When I was a baby my intestines were twisted which caused sudden onset of puking.

2y Like Reply

Write a comment...

Save Baby Cyrus  
March 14, 2022

Please sign & share! #SaveBabyCyrus #MedicalKidnap #EXPOSECPS  
[www.change.org/SendBabyCyrusHome](http://www.change.org/SendBabyCyrusHome)



...ID BABY CYRUS HOME  
...ision makers



- Brad Little**  
Governor
- Dave Jeppesen**  
Director of Idaho Health and Welfare
- Miren Unsworth**  
Deputy Director - ID H&W
- Lisa Hettinger**  
Deputy Director - ID H&W

## 0 BABY CYRUS HOM

re signed. Let's get to 500!

500 signatures, this petition is r  
ely to be featured in recommend

- Idaho State Senate**
- Idaho State House**

at **4 Lilly** started this petition to Governi  
le and **6 others**

58 11 comments 51 shares

Like Comment Share

View more comments

**Krystal Sarceno**  
Hey Little it's MID TERMS!!!! Make it right!!!  
2y Like Reply

Write a comment... 3

**Save Baby Cyrus**  
March 14, 2022

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS



GIVENSNDGO.COM  
Click here to Give now to Save Baby Cyrus from Medical Kidnapping by Rick Green  
<div id="stacks\_in\_51" class="stacks\_in\_com\_yourhead\_stack\_he...

48 1 comment 11 shares

Like Comment Share

**AJ McGowan**  
Sadly, medical kidnapping is NOTHING OF NEW IN THE CPS WORLD! Reach out to every media source you can. Doctors like Robert Scott bell, Del bigtree, nurse Erin, ppl who have plat forms! Expose that CPS worker to the fullest! My heart goes out to you all... See more  
2y Like Reply

Write a comment...

**Save Baby Cyrus**  
March 14, 2022



**Honorable Lt Jan**  
March 14, 2022  
Update on the Baby Cyrus situation...and the CPS phone call is now scheduled for 2:30 pm this afternoon.

102 17 comments 24 shares

Like Comment Share

View more comments



Rikki Parrish  
This just makes me sick!

Baby Cyrus will forever be changed even at the age of 10 months, for what CPS has done! I think it's disgusting that children are ripped from good homes with good parents and the children that need that help go unnoticed! ... See more

2y Like Reply



Save Baby Cyrus

March 14, 2022

Please sign & share! #SaveBabyCyrus #MedicalKidnap #EXPOSECPS  
[www.change.org/SendBabyCyrusHome](http://www.change.org/SendBabyCyrusHome)



CHANGE.ORG

Sign the Petition

SEND BABY CYRUS HOME!

46

5 comments 35 shares



View more comments



Wendy Looysen  
and shared

2y Like Reply



Save Baby Cyrus

March 14, 2022

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

**CALL TO ACTION!**  
**#savebabycyrus**

Saint Luke's Hospital,  
Boise 1-208-706-5437

Idaho Department of Health  
& Welfare 1-877-456-1233

Functional Medicine of Idaho  
1-208-385-7711

Ada County Sherrif  
1-208-577-3000

Office of Governor Brad Little  
1-208-334-2100

46

6 comments 23 shares



Save Baby Cyrus

March 14, 2022

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS





**Marissa Anderson**  
March 12, 2022 · 🌐

Baby Cyrus was taken from us and into state custody. All of the details are in the article. We appreciate everyone's support and prayers! Please help us #savebabycyrus  
[https://freedomman.org/cyrus/...](https://freedomman.org/cyrus/)

👍❤️🙏 35

16 comments 18 shares

👍 Like    💬 Comment    ➦ Share

View more comments

**Sheryl Payne**  
Is it normal for a nine month old child to be just starting solid foods?  
It seems the parents consulted other practitioners when their child had vomiting issues over a period of a month.  
Vaccines would not be given in his hand.... See more

2y Like Reply

**Kay Pisarek**  
Sheryl Payne yes its normal... some babies don't start solids until a year old.

2y Like Reply

↳ View more replies

Write a comment... 🗨️ 📷 📹 📺 📱

**Save Baby Cyrus**  
March 14, 2022 · 🌐



**Miste Gardner-Karlfeldt** was live.  
March 14, 2022 · 🌐

Live at #SaveBabyCyrus press conference  
#StopMedicalKidnapping

👍❤️🙏 19

👍 Like    💬 Comment    ➦ Share

Write a comment... 🗨️ 📷 📹 📺 📱

**Save Baby Cyrus**  
March 14, 2022 · 🌐



**Marissa Anderson** was live.  
March 12, 2022 · 🌐

👍❤️🙏 37

6 comments 9 shares

👍 Like    💬 Comment    ➦ Share

View more comments

**Jennifer Sutherland O'Brien**  
my heart goes out to you. I hate that the state has changed things the way they have. My child was diagnosed with failure to thrive at 6 weeks old. I was breast feeding and didn't know that she was not getting enough. I had no lactation nurses to tur... See more

2y Like Reply

Write a comment... 🗨️ 📷 📹 📺 📱

Save Baby Cyrus  
March 14, 2022 · 🌐



YOUTUBE.COM  
**Cyrus Kidnapped**

This is how police kidnap children. They ended up taking the baby away and arresting the mot...

👍❤️👍 16 2 comments 9 shares  
Like Comment Share

Save Baby Cyrus  
March 14, 2022 · 🌐

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

freedomman.org

### The Main People Responsible for Baby Cyrus's Kidnapping:



Aaron Dykstra, DNP, FNP-C of Functional Medicine of Idaho



Nice Loufoua, Social Worker



Meridian Police Detective Hanson Badge # 3534



Meridian Police Detective Fuller Badge # 3138

👍❤️👍 78 16 comments 24 shares  
Like Comment Share

View more comments

Julie Zohovetz Morris  
Now to add the wicked judge to the list! 🙄👍  
2y Like Reply 2

Write a comment... 🗨️👍👎🔍🔖

Save Baby Cyrus  
March 14, 2022 · 🌐

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

FUNCTIONAL MEDICINE

**MEDICAL KIDNAPPING ALERT**

#savebabycyrus

Aaron Dykstra, DNP, FNP-C  
Domestic Functional Practitioner

Dr. Aaron Dykstra is a pediatrician at Functional Medicine of Idaho. He initiated the horrific event that has led to the medical kidnapping of baby Cyrus. Call, leave messages, email, tell your friends and demand an explanation, immediately. This behavior is unacceptable!

Phone: 1-208-385-7711  
Email: info@funmedidaho.com

👍❤️👍 66 30 comments 27 shares  
Like Comment Share

View more comments

Steve Thomas II  
Aaron Dykstra needs to be taken out in the Idaho woods and never brought back.  
2y Like Reply

Save Baby Cyrus  
March 14, 2022 · 🌐

STAY UP-TO-DATE THROUGH GRANDPA DIEGO'S BLOG:  
[www.freedomman.org/cyrus](http://www.freedomman.org/cyrus)  
#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

FREEDOMMAN.ORG  
**Baby Cyrus Was Kidnapped! | Freedom Man Press**  
Baby Cyrus Was Kidnapped!

👍❤️👍 10 3 shares

Like Comment Share

Save Baby Cyrus  
March 14, 2022 · 🌐



👍❤️👍 166 16 comments 93 shares

Like Comment Share

View more comments

Brenda Lee  
Why are they ripping families apart  
2y Like Reply

Jeanette Lotter  
Brenda Lee because they are evil, sick, soulless, greedy monsters that only care about profiting off of peoples children! This has to stop. Praying for BAbby Cyrus health to improve and for you to get him back asap. Sharing your story !!!  
2y Like Reply

Save Baby Cyrus  
March 14, 2022 · 🌐



👍❤️👍 186 29 comments 45 shares

Like Comment Share

View more comments

**Joy Lynn Learned**  
There's TWO sides to every story don't Believe every thing you hear unless you get both sides to make judgment  
2y Like Reply

**Brandi Timmer**  
Joy Lynn Learned the "authorities" are breaking the law and stripping American citizens of rights on American soil? How is that a side worthy of respect?  
2y Like Reply

View more replies

Write a comment...

**Save Baby Cyrus**  
March 14, 2022



241 17 comments 37 shares

Like Comment Share

View more comments

**Marcia Stott Ballard**  
Having an effective and unafraid attorney makes all the difference in the world  
2y Like Reply

Write a comment...

**Save Baby Cyrus** updated their profile picture.  
March 14, 2022



# EXHIBIT D2



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

March 14, 2022 ·



STAY UP-TO-DATE THROUGH GRANDPA DIEGO'S BLOG: [www.freedomman.org/cyrus](http://www.freedomman.org/cyrus) #SaveBabyCyrus #MedicalKidnap #EXPOSECPS

FREEDOMMAN.ORG

**Baby Cyrus Was Kidnapped! | Freedom Man Press**  
Baby Cyrus Was Kidnapped!

👍👍👍 10

3 shares

Like

Comment

Share

# EXHIBIT D3

Save Baby Cyrus

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

freedomman.org/cyrus

Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus March 14, 2022

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

**FUNCTIONAL MEDICINE**

**MEDICAL KIDNAPPING ALERT**

#savebabycyrus

Aaron Dykstra, DNP, FNP-C  
Pediatric Functional Practitioner

Dr. Aaron Dykstra is a pediatrician at Functional Medicine of Idaho. He initiated the horrific event that has led to the medical kidnapping of baby Cyrus. Call, leave messages, email, tell your friends and demand an explanation, immediately. This behavior is unacceptable!

**Phone: 1-208-385-7711**  
**Email: info@funmedidaho.com**

66 reactions

30 comments 27 shares

Like

Comment

Share

# EXHIBIT D4

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause
freedomman.org/cyrus
Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus
March 14, 2022

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

freedomman.org

The Main People Responsible for Baby Cyrus's Kidnapping:



Aaron Dykstra, DNP, FNP-C of Functional Medicine of Idaho



Nice Loufoua, Social Worker



Meridian Police Detective Hanson Badge # 3534



Meridian Police Detective Fuller Badge # 3138

# EXHIBIT D5



Save Baby Cyrus



[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 14, 2022 · 🌐



YOUTUBE.COM

Cyrus Kidnapped

This is how police kidnap children. They ended up taking the baby away and arre...

👍👎👤 16

2 comments 9 shares

👍 Like

💬 Comment

➦ Share

**EXHIBIT D6**

**VIDEO ON  
THUMB DRIVE**

# EXHIBIT D7

Intro

Family Support Page for #SaveBabyCyrus

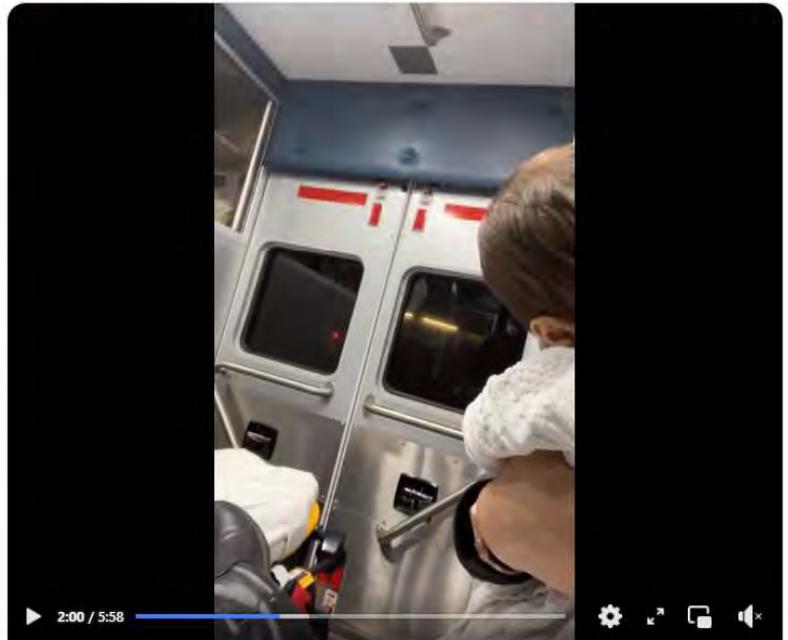
- Page · Cause
- [freedomman.org/cyrus](http://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus March 14, 2022



Marissa Anderson was live. March 12, 2022

37 reactions

6 comments 9 shares

**EXHIBIT D8**

**VIDEO ON  
THUMB DRIVE**

# EXHIBIT D9

Save Baby Cyrus

Page · Cause  
freedomman.org/cyrus  
Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus

March 14, 2022



Miste Gardner-Karlfeldt was live.  
March 1, 2022  
Live at #SaveBabyCyrus press conference  
#StopMedicalKidnapping

19 reactions  
Like Comment Share

**EXHIBIT D10**

**VIDEO ON  
THUMB DRIVE**

# **EXHIBIT D11**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

- 📄 Page · Cause
- 🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)
- ★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 14, 2022 · 🌐



#SaveBabyCyrus #MedicalKidnap #EXPOSECPS



Marissa Anderson

March 14, 2022 · 🌐

Baby Cyrus was taken from us and into state custody. All of the details are in the article. We appreciate everyone's support and prayers! Please help us #savebabycyrus [https://freedomman.org/cyrus/...](https://freedomman.org/cyrus/)

👍👎❤️ 35

16 comments 18 shares

# **EXHIBIT D12**

**Intro**

Family Support Page for #SaveBabyCyrus

-  Page · Cause
-  [freedomman.org/cyrus](https://freedomman.org/cyrus)
-  Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus  
March 14, 2022 · 🌐

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

**CALL TO ACTION!**

**#savebabycyrus**

Saint Luke's Hospital,  
Boise 1-208-706-5437

Idaho Department of Health  
& Welfare 1-877-456-1233

Functional Medicine of Idaho  
1-208-385-7711

Ada County Sherrif  
1-208-577-3000

Office of Governor Brad Little  
1-208-334-2100

# EXHIBIT D13



Save Baby Cyrus



[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 14, 2022 · 🌐



Please sign & share! [#SaveBabyCyrus](#) [#MedicalKidnap](#) [#EXPOSECPS](#)  
[www.change.org/SendBabyCyrusHome](https://www.change.org/SendBabyCyrusHome)



CHANGE.ORG

**Sign the Petition**

SEND BABY CYRUS HOME!

👍👩👧👦❤️ 46

5 comments 35 shares

👍 Like

💬 Comment

➦ Share

# **EXHIBIT D14**

### Intro

Family Support Page for #SaveBabyCyrus

-  Page · Cause
-  [freedomman.org/cyrus](http://freedomman.org/cyrus)
-  Rating · 5.0 (6 Reviews) 

### Photos

[See all photos](#)



 Save Baby Cyrus  
March 14, 2022 · 🌐

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS



GIVESENDGO.COM  
 Click here to Give now to Save Baby Cyrus from Medical Kidnapping by Rick Green

    48 1 comment 11 shares

 Like  Comment  Share

# **EXHIBIT D15**

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

freedomman.org/cyrus

Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus  
March 14, 2022 ·

Please sign & share! #SaveBabyCyrus #MedicalKidnap #EXPOSECPS  
www.change.org/SendBabyCyrusHome



SEND BABY CYRUS HOME

Decision makers

Brad Little  
Governor

Dave Jeppesen  
Director of Idaho Health and Welfare

Miren Unsworth  
Deputy Director - ID H&W

Lisa Hettinger  
Deputy Director - ID H&W

Idaho State Senate

Idaho State House

Cameron Gilliland  
Division of Family and Community Services

SEND BABY CYRUS HOME

We've signed. Let's get to 500!

500 signatures, this petition is ready to be featured in recommendations

at 4 Lilly started this petition to Govern...  
le and 6 others

58

11 comments 51 shares

# **EXHIBIT D16**

Search Facebook



Save Baby Cyrus



Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

Photos

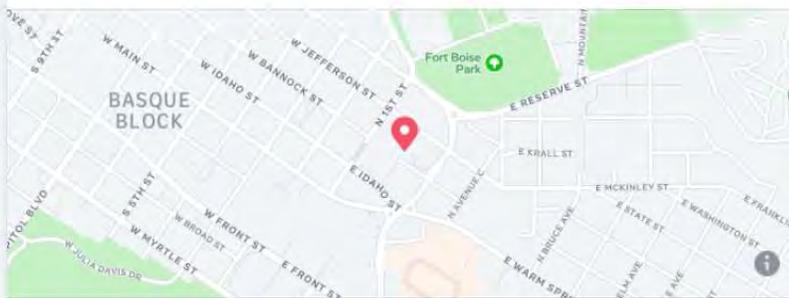
[See all photos](#)



Save Baby Cyrus is 😡 feeling pissed at St Lukes Downtown.

March 14, 2022 · Boise · 🌐

★ Baby Cyrus Press Conference ★  
6 PM TODAY at Boise St. Luke's. Details that you need to know. Help Save Cyrus! #SaveBabyCyrus #MedicalKidnap #EXPOSECPS



HOSPITAL  
St Lukes Downtown

👍 🥰 ❤️ 75

6 💬 8 ➦

👍 Like

💬 Comment

➦ Share

# **EXHIBIT D17**



Save Baby Cyrus



★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 14, 2022 · 🌐



FREEDOMMAN.ORG

**Baby Cyrus Was Kidnapped! | Freedom Man Press**

Baby Cyrus Was Kidnapped!

👍🥰🙄 43

10 💬 19 ➦

👍 Like

💬 Comment

➦ Share

[View more comments](#)

# EXHIBIT D18

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus  
March 15, 2022 · 🌐

1,234 have signed!! Have you? Let's get to 2,000 by its time for court? Please sign & share!  
[www.change.org/SendBabyCyrusHome](http://www.change.org/SendBabyCyrusHome)  
#SaveBabyCyrus #MedicalKidnap #EXPOSECPS



**SEND BABY CYRUS HOME!**

1,234 have signed. Let's get to 1,500!



   142

36 comments 81 shares

# EXHIBIT D19

**Intro**

Family Support Page for #SaveBabyCyrus

📄 Page · Cause

🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 🗨️

**Photos**

[See all photos](#)



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 Save Baby Cyrus is 🤔 feeling angry at **Ada County Courthouse**.

March 15, 2022 · 🌐

Court update: Magistrate Judge Laurie Fortier

No one was allowed into the courtroom except the parents and only one of their attorneys. The judge denied the request for the 2nd attorney to be present.

Bailiffs guarded the door. Others guarded the elevators. Officers wandered the halls. Supporters were prohibited from recording or taking photos per administrative order preventing recordings on the 4th floor. Why?!?!

One doctor testified, but the parents were told to sign a gag order so no one can talk about what happened inside the locked court room.

The shelter care hearing lasted 3 hours and was continued to tomorrow (3/16) at 1pm, so another doctor can testify.

All of this was observed by supporters and not told by the parents or lawyers.

Closed doors and gag orders breeds government corruption!! 🤔🤔🤔

#MedicalKidnap #OpenTheDoors  
#SaveBabyCyrus #SendCyrusHome  
#ExposeCPS #WhatAreYouHiding



# **EXHIBIT D20**

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus

March 15, 2022 · 🌐

Some photos of Cyrus while in state's care 😞  
#SaveBabyCyrus #sendbabycyrushome #medicalkidnap #EXPOSECPS



🥺🥲🥹 279

62 comments 71 shares

 Like

 Comment

 Share

[View more comments](#)

# **EXHIBIT D21**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating - 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

March 15, 2022



Steph Black

March 15, 2022

It's time for baby Cyrus to come home today.  
 It's time to expose these thugs for who they are, liars and kidnapers.  
 It's time to show the naysayers and the defenders of the system exactly how brainwashed, mind controlled, and manipulated you are.  
 The undeniable evidence against this system will prevail today. The light will shine on the darkness, and I can't wait to have a front row seat. I was there when I got the sweetest picture saying "He's here" and I'll be there for the sweetest moment when he's reunited with [Levi Anderson](#) and [Marissa Anderson](#).  
 Baby Cyrus, it's time to come home today sweet boy!

237

22 comments 32 shares

Like

Comment

Share

# **EXHIBIT D22**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

March 16, 2022 · 🌐



3,600+ have signed!! Have you? Let's get to 5,000 today? Please sign & share!  
[www.change.org/SendBabyCyrusHome](http://www.change.org/SendBabyCyrusHome)  
#SaveBabyCyrus #MedicalKidnap #EXPOSECPS #SendBabyCyrusHome



# SEND BABY CYRUS HOME!

3,633 have signed. Let's get to 5,000!



At 5,000 signatures, this petition is more likely to get picked up by **local news!**

113

18 comments 94 shares

# EXHIBIT D23

Search Facebook



### Save Baby Cyrus

Family Support Page for #SaveBabyCyrus



Page · Cause



[freedomman.org/cyrus](https://freedomman.org/cyrus)



Rating · 5.0 (6 Reviews)

### Photos

[See all photos](#)



### Save Baby Cyrus

March 16, 2022 · 🌐

AFLDS.ORG

**Medical Kidnapping? Breast milk-dependent infant deteriorates in state custody | America's Frontline Doctors**

👍👍👍 175

45 💬 104 ➦

Like

Comment

Share

# EXHIBIT D24

Search Facebook



### Save Baby Cyrus



Family support page for #savebabyCyrus



Page · Cause



[freedomman.org/cyrus](https://freedomman.org/cyrus)



Rating · 5.0 (6 Reviews)

### Photos

[See all photos](#)



Save Baby Cyrus is 🥺 feeling heartbroken at Ada County Courthouse. ...

March 16, 2022 · 🌐

Court update: Judge Laurie Fortier DID NOT send Baby Cyrus home at Shelter Care. ❤️🥺

Now it's time to fight to bring him back to his parents where he belongs. Next hearing will be in a month. More details will be posted soon. Stay tuned... #SaveBabyCyrus #MedicalKidnap #ExposeCPS #SendBabyCyrusHome

🥺🥺🥺 403

500 🗨️ 123 ➦

Like

Comment

Share

[View more comments](#)

# **EXHIBIT D25**

### Save Baby Cyrus

Page · Cause  
freedomman.org/cyrus  
Rating · 5.0 (6 Reviews)

#### Photos [See all photos](#)



Save Baby Cyrus  
March 17, 2022 · 🌐  
#SaveBabyCyrus #SendBabyCyrusHome  
#MedicalKidnap #EXPOSECPS

2 This is what the LORD says:  
  
“I will go before you, Cyrus,  
and level the mountains.  
I will smash down gates of bronze  
and cut through bars of iron.  
3 And I will give you treasures  
hidden in the darkness—  
secret riches.  
I will do this so you may know  
that I am the LORD,  
the God of Israel, the one who  
calls you by name.

👍❤️👏 333 50 comments 22 shares  
Like Comment Share

# **EXHIBIT D26**

Search Facebook



Save Baby Cyrus



★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus



March 17, 2022 · 🌐

Almost 5,000 signatures! Haven't signed yet? Please do! And please continue to share.

[#SaveBabyCyrus](#) [#sendbabycyrushome](#) [#medicalkidnap](#) [#EXPOSECPS](#)



CHANGE.ORG

**Sign the Petition**

SEND BABY CYRUS HOME!

👍❤️👉 38

5 💬 16 ➦

# **EXHIBIT D27**

Search Facebook



Save Baby Cyrus



★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 17, 2022 · 🌐



This is the ONLY family approved fundraiser!



GIVESENDGO.COM

Click here to Give now to Save Baby Cyrus from Medical Kidnapping by Rick Green

👍❤️👉 118

5 💬 27 ➦

👍 Like

💬 Comment

➦ Share

# EXHIBIT D28

Search Facebook



Save Baby Cyrus



★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 17, 2022 · 🌐



[#SaveBabyCyrus](#) [#sendbabycyrushome](#) [#medicalkidnap](#) [#EXPOSECPS](#)

MEDICALKIDNAP.COM ⓘ

Idaho Judge Sanctions Medical Kidnapping and Child Trafficking as Innocent Baby Suffers in State Care - Medic...

👍👍👍 117

15 💬 60 ➦

👍 Like

💬 Comment

➦ Share

[View more comments](#)

# EXHIBIT D29

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos

See all photos



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Here is a speech given by Sen Nancy Schaefer. This is the truth you need to know about cps. Read the comments, they will rip your heart out but you will learn even more. You must know the evil we are up against and let it drive you to your knees in pray and spur you into action. She and her husband were both shot while she was attempting to expose the depth of the evil and corruption of CPS.

There is no truth in CPS family kangaroo court. There is no reason. I know it's hard to understand because we try to operate in truth but this court is unlawful in its very existence and doesn't operate in truth but lies.

Keep in mind that the people who took baby Cyrus are the same people who will call it "attachment disorder" if a mom pleads with these demons that she loves her baby. These are the same people who will call it "attachment disorder" when a child cries and screams while reaching for mama. This court, CPS, the hospitals are in cahoots against the truth, the people, and ultimately God.

[https://youtu.be/\\_TcDTjPWbE](https://youtu.be/_TcDTjPWbE)

# EXHIBIT D30

**Intro**

Family Support Page for #SaveBabyCyrus

---

**i** Page · Cause

**🌐** [freedomman.org/cyrus](http://freedomman.org/cyrus)

**★** Rating · 5.0 (6 Reviews) **i**

**Photos** [See all photos](#)




👍❤️👍 255

23 comments 11 shares

👍 Like    💬 Comment    ➦ Share

[View more comments](#)

# **EXHIBIT D31**

### Save Baby Cyrus

#### Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

#### Photos

[See all photos](#)



### Save Baby Cyrus

March 17, 2022 · 🌐

Tell them what you think? 🌟🌟  
[cdhidaho.gov/hl-d4citizen-panel](http://cdhidaho.gov/hl-d4citizen-panel)  
#SaveBabyCyrus

#### Central District Health

5h · 🌐

The Panel provides an independent, citizen voice to the development and implementation of child welfare policies, procedures, and laws. The purpose of the Citizen Review Panel (CRP) is to evaluate and provide recommendations for the improvement of the child protection system.

For more information, please review the flyer and guidance document found here 📄  
[www.cdhi.idaho.gov/hl-d4citizen-panel.php](http://www.cdhi.idaho.gov/hl-d4citizen-panel.php)

#### Now Accepting!

#### Public Testimony Requests for the Region IV Citizen Review Panel



The Panel wants to hear from Ada, Boise, Elmore and Valley County residents on their thoughts, experiences, and perspectives of the Idaho child welfare system.

The Panel is accepting written public comment.  
Requests to provide verbal public testimony will be reviewed.



Learn more at:  
[cdh.idaho.gov/hl-d4citizen-panel](http://cdh.idaho.gov/hl-d4citizen-panel)

👍👍 90

16 comments 25 shares

# **EXHIBIT D32**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating - 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

March 17, 2022 · 🌐



We've reached 5,000 signatures! Haven't signed yet? Please do! And please continue to share. [www.change.org/sendbabycyrushome](http://www.change.org/sendbabycyrushome) #SaveBabyCyrus #sendbabycyrushome #medicalkidnap #EXPOSECPS



Petition · SEND BABY CYRUS HOME! · Change...



[change.org](http://change.org)



# SEND BABY CYRUS HOME!

5,000 have signed. Let's get to 7,500!



At 7,500 signatures, this petition is more likely to get a reaction from the **decision maker!**

107

7 comments 38 shares

Like

Comment

Share

# EXHIBIT D33



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus/](https://freedomman.org/cyrus/)

Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus is 🙏 feeling grateful.

March 18, 2022 · 🌐

A week after Baby Cyrus was forcibly removed from his parents by police, he has finally been returned home to his parents where he belongs!! Learn more at <https://freedomman.org/cyrus/>  
They couldn't have done it without all of you!! Thank you!! ❤️ The fight isn't over though. There is still an active CPS case, and cases in both family and criminal court. These parents still need your support. #SaveBabyCyrus  
Please stay tuned for updates!!



# EXHIBIT D34

**Intro**

Family Support Page for #SaveBabyCyrus

- 📄 Page · Cause
- 🌐 [freedomman.org/cyrus](http://freedomman.org/cyrus)
- ★ Rating · 5.0 (6 Reviews) 1

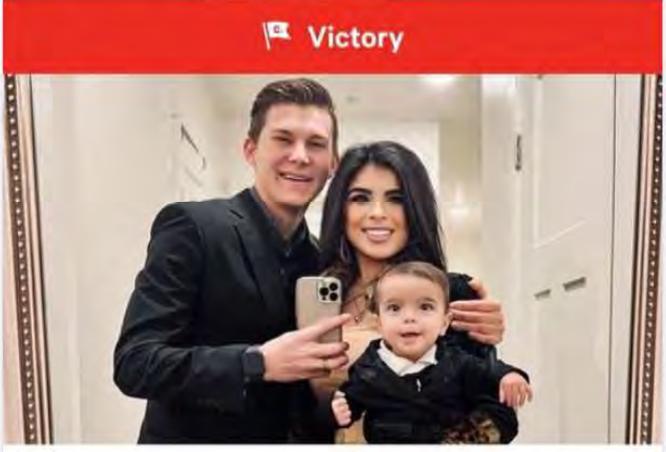
**Photos**

[See all photos](#)



 Save Baby Cyrus  
March 18, 2022 · 🌐

You did it! #SaveBabyCyrus is home with his family where he belongs. #MedicalKidnap Thank You!!!! Please don't forget this happens. There are hundreds of thousands more children in this corrupt system that need you to remember... #EXPOSECPS 🧡



**SEND BABY CYRUS HOME!**

This petition made change with 5,333 supporters!

👍❤️ 491 35 comments 60 shares

- 👍 Like
- 💬 Comment
- ➦ Share

# EXHIBIT D35

 Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

**i** Page · Cause  
[freedomman.org/cyrus](https://freedomman.org/cyrus)  
★ Rating · 5.0 (6 Reviews)

**Photos**

[See all photos](#)



 Save Baby Cyrus  
March 19, 2022 · 🌐

They said "Don't protest, it will rock the boat." The people protested anyway. And tipped the whole thing over. Thank you to everyone who took the time to protest the medical kidnapping of sweet Baby Cyrus. We couldn't have brought him home without you! ❤️

✕ "Child of Concern Returned to Parents" from...  
local.nixle.com

**Full Notification**

Entered By: [Meridian Police Department](#)

Entered On: Friday March 18th, 2022 :: 04:49 p.m. MDT

**Advisory:**

Child of Concern Returned to Parents

MERIDIAN POLICE DEPARTMENT

FOR IMMEDIATE RELEASE: March 18, 2022

CONTACT: Kelsey Johnston, Public Information Officer

Child of Concern Returned to Parents  
MERIDIAN- The baby amid the controversy over the last week due to an imminent danger declaration was returned to its parents today around noon. In these situations, the goal is to reunite the child to its parents as soon as it is healthy enough to be returned. Normally the parents agree to certain stipulations by the court. What those were or if there were stipulations is unknown.

There is no need to continue protesting or

👍❤️ 703 173 comments 91 shares  
👍 Like    💬 Comment    ➦ Share

# EXHIBIT D36

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause  
freedomman.org/cyrus  
Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus  
March 20, 2022

#SaveBabyCyrus #medicalkidnap #EXPOSECPS

**LET'S MAKE A P.A.C.T. RALLY**

**PEOPLE AGAINST CHILD TRAFFICKING**

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from other Idaho family's who have had their lives ruined and their children kidnapped by CPS
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to fight back against tyranny and protect your family!

Learn the details of the Baby Cyrus Medical Kidnapping Case

**SATURDAY, MARCH 26TH  
12:00 NOON • Location TBD**

**FreedomMan.org/cyrus**

271 21 comments 55 shares

Like Comment Share

# **EXHIBIT D37**

 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



 Save Baby Cyrus  
March 20, 2022 · 🌐

⋮

A thorough exposé on the corruption found within Child Protective Services, written by former Texas CPS investigator/social worker - turned whistle blower - Carlos Morales. Protect your family!  
Get the book : [www.legallykidnapped.net](http://www.legallykidnapped.net)  
#ExposeCPS #medicalkidnap #Kids4Cash



YOUTUBE.COM

**Legally Kidnapped: The Case Against Child Protective Services**

Legally Kidnapped: The Case Against Child Protective Services exposes the dang...

👍 🥰 🙄 97

18 comments 41 shares

# EXHIBIT D38

 Save Baby Cyrus



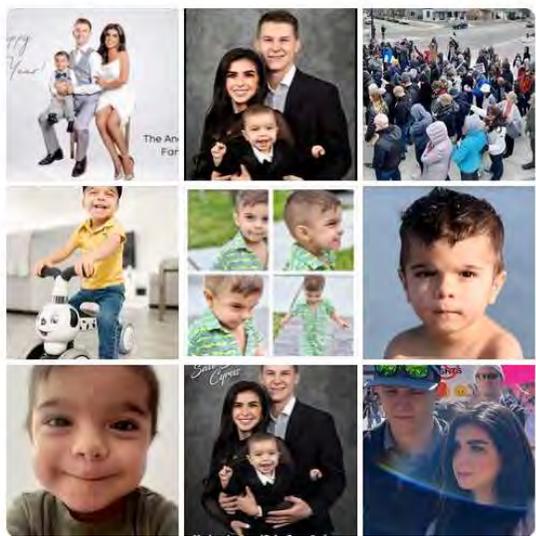
 Page · Cause

 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

Photos

[See all photos](#)



 Save Baby Cyrus



March 20, 2022 · 🌐

[#SaveBabyCyrus](#) [#MedicalKidnap](#) [#EXPOSECPS](#)

AFLDS.ORG

**Baby Cyrus returned to parents after Frontline News inquiry to CPS | America's Frontline Doctors**

  Maura Woods and 371 others

75 comments · 59 shares

 Like

 Comment

 Share

# EXHIBIT D39

### Save Baby Cyrus

Page · Cause  
freedomman.org/cyrus  
Rating · 5.0 (6 Reviews)

### Photos [See all photos](#)



**Save Baby Cyrus**  
March 21, 2022 · [#SaveBabyCyrus #medicalkidnap #EXPOSECPS #Kids4Cash](#)

MEDICALKIDNAP.COM  
**Baby Cyrus Back Home! Grandfather Announces Rally for Idaho Parents Who Lost Children to CPS - Medical Kidnap**

129 likes · 5 comments · 13 shares

Like Comment Share

View more comments

**Rochelle Ledbetter Robinson**  
So glad he's back home where he belongs! I enjoyed your interview with Rick Green on Front Porch Live Sunday night.

2y Like Reply  
Write a comment...

**Save Baby Cyrus**  
March 20, 2022 · [#SaveBabyCyrus #MedicalKidnap #EXPOSECPS](#)

# EXHIBIT D40

 Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

📄 Page · Cause

🌐 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 1

**Photos**

[See all photos](#)



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 Save Baby Cyrus  
March 21, 2022 · 🌐

The address is now confirmed.  
Please share this flier and attend:  
People Against Child Trafficking (P.A.C.T.) Rally  
Saturday, March 26th @ 12:00 noon  
800 E. Locust Street  
Emmett, ID 83617  
#SaveBabyCyrus #medicalkidnap  
#EXPOSECPS #Kids4Cash

**LET'S MAKE A P.A.C.T. RALLY**



**PEOPLE  
AGAINST CHILD  
TRAFFICKING**

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from other Idaho families who have had their lives ruined and their children kidnapped by CPS
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to fight back against tyranny and protect your family!



[Learn the details of the Baby Cyrus Medical Kidnapping Case](#)

**SATURDAY, MARCH 26TH @ 12:00 Noon  
800 E Locust St. • Emmett, ID 83617**

**[FreedomMan.org/cyrus](http://FreedomMan.org/cyrus)**

# **EXHIBIT D41**



Intro

Family Support Page for #SaveBabyCyrus

📄 Page · Cause

🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5,0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

March 21, 2022 · 🌐



In 2008, Senator Nancy Schaefer wrote a scathing report to the Georgia State Assembly titled: The Corrupt Business of Child Protective Services

Protect your family by learning about the financial incentives the state receives through wrongfully removing loved children from good families. Learn why we need YOU to continue to help expose this issue and stand up for all children being used as currency for federal funding while in state "protective custody".

Read the report:

[https://parentalrights.org/child\\_protective\\_services/](https://parentalrights.org/child_protective_services/)

And hear her words directly:

(Nancy Schaefer on CPS)

<https://youtu.be/K1HjVU-UIQU>

#SaveBabyCyrus #MedicalKidnap

#EXPOSECPS #Kids4Cash



👍❤️👏 121

19 comments 55 shares

👍 Like

💬 Comment

🔗 Share

# **EXHIBIT D42**

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



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 Save Baby Cyrus

March 21, 2022 · 



 Fight for Lilly Consulting & Advocacy

June 3, 2021 · 

HOW TO OPEN YOUR DOOR TO CPS:

#1: VIDEO RECORD

#2: STATE THE FOLLOWING:

The 4th Amendment of the United States Constitution states "the right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, except upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."

My 4th amendment right allows me to NOT give you access to my home without a warrant and I am NOT allowing you in of my own free will. You have threatened me to give you access to my home, and in order to do what is best for my children - I am opening my doors UNDER DURESS.

Original video:

<https://www.facebook.com/cpscorruptionandscandals/videos/631302633681962/>

# EXHIBIT D43

### Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

### Photos [See all photos](#)



### Save Baby Cyrus

March 24, 2022 · 🌐

Tell your legislators to vote yes on HB 821 🌟

#StopMedicalKidnap #SaveBabyCyrus

<https://healthfreedomidaho.com/hb-821-stop-medical-kidnap/>

#STOPMEDICALKIDNAP#SAVEBABYCYRUS

# STOP MEDICAL KIDNAP

EMAIL & CALL  
THE WAYS & MEANS COMMITTEE  
TO VOTE YES

## HB 821

HEALTH FREEDOM IDAHO  
Your Life. Your Health. Your Way.  
[HealthFreedomIdaho.com](http://HealthFreedomIdaho.com)

👍❤️ 173      38 shares

Like      Comment      Share

# EXHIBIT D44

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus

March 24, 2022 · 🌐

⋮

Tell your legislators to vote yes on HB 821  
[#StopMedicalKidnap](#)



HEALTHFREEDOMIDAHO.COM

**HB 821 Stop Medical Kidnap in Idaho - Health Freedom Idaho**

Medical Kidnap is the wrongful removal of a minor or vulnerable adult from a parent

  156

12 comments 37 shares

 Like

 Comment

 Share

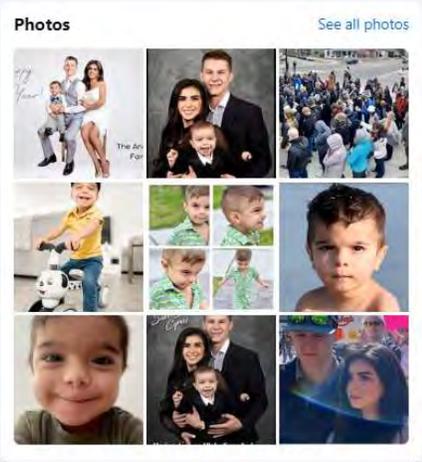
# EXHIBIT D45

**Intro**  
 Family Support Page for #SaveBabyCyrus

1 Page · Cause

🌐 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ



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Save Baby Cyrus  
 March 25, 2022 · 🌐

Tomorrow! 😊

## LET'S MAKE A P.A.C.T. RALLY



# PEOPLE AGAINST CHILD TRAFFICKING

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from other Idaho families who have had their lives ruined and their children kidnapped by CPS
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to fight back against tyranny and protect your family!



Learn the details of the Baby Cyrus Medical Kidnapping Case

**SATURDAY, MARCH 26TH @ 12:00 Noon**  
**800 E Locust St. • Emmett, ID 83617**  
[FreedomMan.org/cyrus](http://FreedomMan.org/cyrus)

Save Baby Cyrus  
 March 21, 2022 · 🌐

The address is now confirmed.  
 Please share this flier and attend:  
 People Against Child Trafficking (P.A.C.T.) Rally  
 Saturday, March 26th @ 12:00 noon... See more

# EXHIBIT D46

Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](https://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

Photos

See all photos



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I've debated making this post, as the words needed to describe my feelings and gratitude are hard to find, but I will try my best.

First, I want to express gratitude to all of you—friends, family and complete strangers who have given their prayers, encouragement, time, energy and resources to help us in this battle and to be there for our family in our darkest time. It is absolutely unfathomable to me to see this much support and love. I wish I could hug each of you and thank you and cry with you and praise God together. 🙏🥰❤️

Throughout my sons life, we have experienced moments big and small that I truly believe have prepared us for this time. God had a plan for him since before his birth...he was named after a King in the Bible who was directly called by God to carry out His will in a mighty way. We knew God had a very special purpose for our little Cyrus.

For weeks and weeks, we had been praying for healing for our son and to find the cause of his sickness. The day before he was taken, as I was on my knees praying to God, asking for wisdom and guidance on the next step to take for his health, I felt very strongly that this was happening for a reason and that God needed to somehow use this situation for a purpose so much bigger than ourselves.

Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](https://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

Photos

See all photos



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much bigger than ourselves.

So at that moment, I specifically prayed "not my will, but Yours be done. I fully submit myself to Your will..."

Use this family, a willing vessel to accomplish what is needed."

As I ended that prayer, both anxiety and peace filled my soul. I knew God heard my prayer.

The evening that followed, as I sat in the vehicle holding Cyrus, watching my husband pulled out of the truck, cuffed and taken away, then my sister arrested, leaving me alone with my baby, my heart began to beat so fast as the officers approached my door. I knew in my heart what was going to happen next...

The anxiety and fear was enough to almost consume me, but in that moment, I gave it up to God. I KNEW our lives were about to change forever. Despite the pain that filled me, somehow I felt a peace fall over me, I was scared—so scared, but I had peace knowing I was in the perfect will of God.

"But and if ye suffer for righteousness' sake, happy are ye: and be not afraid of their terror, neither be troubled;"

1 Peter 3:14

With each moment that passed, I felt God with me—more than I ever have before. I could almost physically feel His presence. When they took my precious baby from my arms, it was the most painful and ugly thing I have ever experienced. I cried out his name and told him I loved him as many times as I could as they cuffed me and took me out of his sight.

I remember saying: "God, give me the strength. I can't do this alone." He really did give me the strength that I needed that night.

As the officers drove me to the jail, I prayed a very fervent prayer for the safety and protection of my son and I knew he was in the safest place he could be—wrapped in the arms of the angels, and covered in a blanket of prayer.

As I was alone with my thoughts, I fully realized that God called my family for such a time as this, and an overwhelming feeling of gratitude came upon me...

The next day, my husband and I prayed together and thanked God for this situation, thanked Him for the platform we were able to use, for the connections that were already getting involved, for the friends and family who dropped everything to advocate for our family and for what we believe will be accomplished from this. We prayed and hugged and cried together and committed to follow His guidance in each step. Even in the pain, we are at peace. What an honor this truly is.

"We are troubled on every side, yet not distressed; we are perplexed, but not in despair; Persecuted, but not forsaken; cast down, but not destroyed;"

2 Corinthians 4:8-9

We are beyond grateful for the miracle of having our son back home so quickly. I wish I could tell every detail of every miracle that happened to get him home. Maybe one day I will be able to share it all.

This journey is far from over. It really is just the beginning,

# **EXHIBIT D47**

### Save Baby Cyrus

Family Support Page for #SaveBabyCyrus

Page · Cause  
freedomman.org/cyrus  
Rating · 5.0 (6 Reviews)

#### Photos [See all photos](#)



### Save Baby Cyrus

March 27, 2022 · 🌐



HEALTHFREEDOMIDAHO.COM  
**HB 821 Stop Medical Kidnap in Idaho - Health Freedom Idaho**  
Medical Kidnap is the wrongful removal of a minor or vulnerable adult from a parent

27 likes 4 shares  
Like Comment Share

# EXHIBIT D48

Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](http://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus  
March 28, 2022 · 🌐  
Nashville! ❤️

# P.A.C.T RALLY



## People Against Child Trafficking

- Hear the story of Baby Cyrus's medical kidnapping
- Hear from families who have succeeded in getting their children back
- Learn how to prevent your family from having a child kidnapped by CPS
- Find out how the CPS system works and why your family is in danger
- Get resources to protect your family!



Learn the details of the Baby Cyrus Medical Kidnapping Case

**Sunday, April 3rd @ 3:00pm**

East Park Community Center (Theater)  
600 Woodland St. • Nashville, TN 37206

[babycyrus.com](http://babycyrus.com)

👍❤️👍 164

9 comments 25 shares

👍 Like    💬 Comment    ➦ Share

# EXHIBIT D49

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](http://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

Photos See all photos



Save Baby Cyrus March 29, 2022 ·

Please stand by and send lots of prayers... 🙏🙏🙏 #SaveBabyCyrus



BE ON STANDBY! BE READY!

# BABY CYRUS NEEDS YOUR HELP!

CPS social worker is demanding that Levi & Marissa take Baby Cyrus back to the hospital even though his weight is above what it was when they last discharged him. It is possible this could be a trap & we ask that everyone be on high alert. We will keep everyone posted.

👍👍👍 573

172 comments 127 shares

Like Comment Share

# EXHIBIT D50

 Save Baby Cyrus



 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

Photos

[See all photos](#)



 Save Baby Cyrus is 🥰 feeling grateful in Boise.  
March 29, 2022 · 🌐



UPDATE: Baby Cyrus has been discharged and is headed home with his parents where he belongs. Thank you so much for all of your continued support and prayers. You are very much appreciated in this fight to #SaveBabyCyrus ❤️

**Diego Rodriguez (Baby Cyrus)**  
Baby Cyrus is out of the hospital!  
He's with Marissa and Levi and they are heading home!  
Now

**Marissa Anderson (Baby Cyrus)**  
One word to describe the whole thing....UNNECESSARY!  
Now

   528 79 comments 35 shares

 Like  Comment  Share

[View more comments](#)

# **EXHIBIT D51**

 Save Baby Cyrus

**Page** · Cause  
[freedomman.org/cyrus](https://freedomman.org/cyrus)  
★ Rating · 5.0 (6 Reviews) ⓘ

**Photos** [See all photos](#)



 Save Baby Cyrus  
March 29, 2022 · 🌐

Double update... because Baby Cyrus is THAT special. 🥰 He is home with his family where he belongs! Let's keep it that way! ❤️❤️❤️  
[#SaveBabyCyrus](#)



❤️👍🥰 360 18 comments 12 shares

👍 Like    💬 Comment    ➦ Share

# **EXHIBIT D52**

Search Facebook



### Save Baby Cyrus



Family support page for #savebabyCyrus



Page · Cause



[freedomman.org/cyrus](http://freedomman.org/cyrus)



Rating · 5.0 (6 Reviews) ⓘ

### Photos

[See all photos](#)



### Save Baby Cyrus



March 29, 2022 · 🌐

Update #3... because yes...  
#SaveBabyCyrus is THAT important and we will NEVER back down...  
THANK YOU!! ❤️  
God Bless 🙏🍌🍌 #CyrusArmy ❤️

#### Marissa Anderson (Baby Cyrus)

We are home! Thank you all so much! It brings us so much peace knowing we have an "army" out there ready to fight for baby Cyrus! God bless you greatly! 🙏🍌❤️



Now



👍❤️🍌 295

11 💬 10 ➦

👍 Like

💬 Comment

➦ Share

# EXHIBIT D53



Save Baby Cyrus



Family Support Page for #SaveBabyCyrus

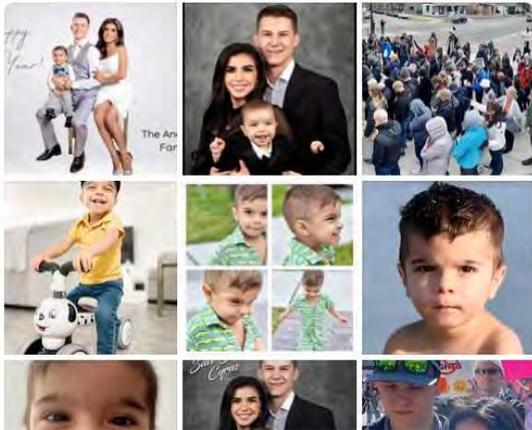
Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

April 1, 2022 · 🌐



#SaveBabyCyrus #MedicalKidnap  
#EXPOSECPS #Kids4Cash



HEALTHFREEDOMIDAHO.COM

The Corrupt Business of CPS - Health Freedom Idaho

I used to believe, as most still do, that Child Protective Services only interfered in

👍 🥰 🙄 117

16 comments 33 shares



# **EXHIBIT D54**



Save Baby Cyrus



Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

April 3, 2022 · 🌐



The PACT Rally LIVE in Nashville, Tennessee:

<https://www.facebook.com/rachelbrunospeaks/videos/234718392174691/>



Rachel Bruno - Author & Public Speaker was live.

April 3, 2022 · 🌐



# **EXHIBIT D55**

**Intro**

Family Support Page for #SaveBabyCyrus

-  Page · Cause
-  [freedomman.org/cyrus](https://freedomman.org/cyrus)
-  Rating · 5.0 (6 Reviews) 

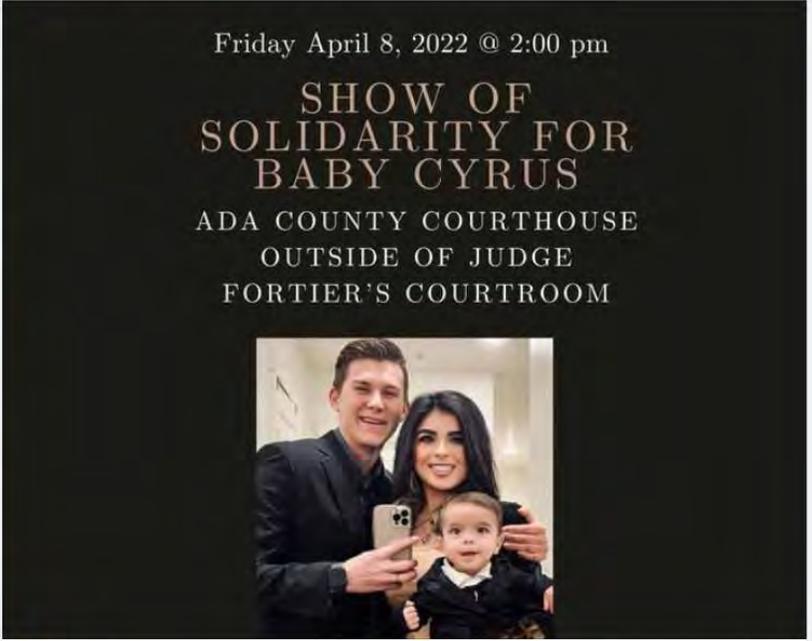
**Photos**

[See all photos](#)



 Save Baby Cyrus  
April 5, 2022 · 🌐

#SaveBabyCyrus Show of Solidarity!  
Learn more & RSVP - <https://facebook.com/events/s/savebabycyrus-show-of-solidari/937354060286674/>



   74

9 comments 12 shares

# EXHIBIT D56



Save Baby Cyrus



[freedomman.org/cyrus](https://freedomman.org/cyrus)



Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus



April 5, 2022 · 🌐

#SaveBabyCyrus Show of Solidarity!

Learn more & RSVP - <https://facebook.com/events/s/savebabycyrus-show-of-solidari/937354060286674/>

👍❤️👍 121

10 comments · 17 shares

👍 Like

💬 Comment

➦ Share

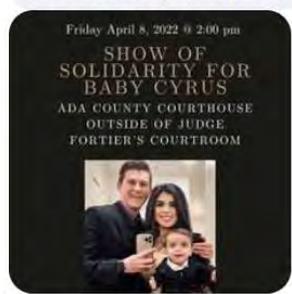
View more comments



Author

Save Baby Cyrus

The time is at 2pm, instead of 1pm.



1y Like Reply

👍 5

# **EXHIBIT D57**



Save Baby Cyrus



**Intro**

Family Support Page for #SaveBabyCyrus

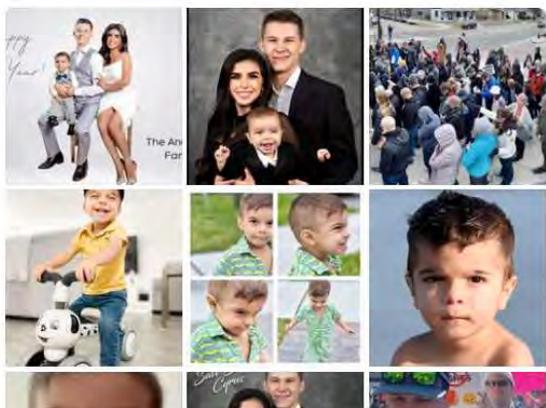
**i** Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) **i**

**Photos**

[See all photos](#)



Save Baby Cyrus

April 6, 2022 · 🌐



[#SaveBabyCyrus](#) [#MedicalKidnap](#)



0:05 / 1:26

118

15 comments 53 shares

Like

Comment

Share

[View more comments](#)

[Mona Taylor](#)

**EXHIBIT D58**

**VIDEO ON  
THUMB DRIVE**

# EXHIBIT D59

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus

April 9, 2022 · 🌐

🥰 #SaveBabyCyrus 🥰

Marissa Anderson (Baby Cyrus)



He finally got his feeding tube taken out! The doctor said it wasn't doing him any good.

   990

72 comments 42 shares

# **EXHIBIT D60**

**Intro**

Family Support Page for #SaveBabyCyrus

**Page** · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

**Photos** [See all photos](#)

**Save Baby Cyrus**  
April 21, 2022 · 🌐

New petition to dismiss the case!  
PLEASE SIGN & SHARE!!  
<https://www.change.org/DismisstheCyrusAndersonCase>

CHANGE.ORG

**Sign the Petition**  
Dismiss the Cyrus Anderson Case!

48 4 comments 28 shares

Like Comment Share

View more comments

**Linda Foster**  
Signed

1y Like Reply

# **EXHIBIT D61**

### Save Baby Cyrus

#### Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](http://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

#### Photos

[See all photos](#)



Write a comment...

### Save Baby Cyrus

April 21, 2022 ·



273 22 comments 4 shares

- Like
- Comment
- Share

View more comments

Author  
**Save Baby Cyrus**  
 Be sure to sign the new petition demanding Idaho close the case! Please sign & share!! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



1y Like Reply

# **EXHIBIT D62**

 Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus  
April 21, 2022 · 🌐



  372

23 comments 3 shares

 Like

 Comment

 Share

View more comments



Author

Save Baby Cyrus

Be sure to sign the new petition demanding Idaho close the case! Please sign & share!! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



CHANGE.ORG  
Sign the Petition

1y Like Reply

# **EXHIBIT D63**

 Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

📌 Page · Cause

🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating - 5.0 (6 Reviews) ⓘ

**Photos** [See all photos](#)



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 Save Baby Cyrus

April 22, 2022 · 🌐



👍❤️ 327 16 comments 3 shares

👍 Like    💬 Comment    ➦ Share

View more comments

 *Author*  
 Save Baby Cyrus  
 Be sure to sign the new petition demanding Idaho close the case! Please sign & share!! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



CHANGE.ORG  
Sign the Petition

👍 Like Reply

🗨️ 3

# EXHIBIT D64

### Save Baby Cyrus

**Page · Cause**

[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews)

#### Photos

[See all photos](#)



### Save Baby Cyrus

April 22, 2022 · 🌐

**Kidnapped by Child Protective Services: The Shocking Case of Baby Cyrus**

A case in Idaho around baby Cyrus being taken from his family by Child Protective Services (CPS) is bringing attention to the financial incentives and extralegal powers states have when taking children from their parents.

We spoke with the family and a lawyer involved in the state's seizure of baby Cyrus and found that in such cases, parents lose basic legal protections including the right to a jury and... [See more](#)



THEEPOCHTIMES.COM

[Premiering 4/22, 7:30 PM ET] Kidnapped by Child Protective Services: The Case of Baby Cyrus

👍👎❤️ 71

6 comments 23 shares

# EXHIBIT D65



Save Baby Cyrus



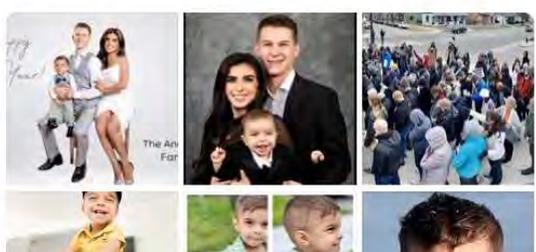
[freedomman.org/cyrus](https://freedomman.org/cyrus)



Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

April 23, 2022 · 🌐



<https://freedomman.org/.../thank-you-message-from-levi.../>



FREEDOMMAN.ORG

April 22nd - Thank You Message from Levi and Marissa | Freedom Man Press

Thank You Message from Levi and Marissa

👍❤️ 76

5 comments 3 shares

👍 Like

💬 Comment

➦ Share

[View more comments](#)

# **EXHIBIT D66**

 Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

📌 Page · Cause

🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

**Photos**

[See all photos](#)



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 Save Baby Cyrus

April 23, 2022 · 🌐

🔥🔥 Cuteness Overload !!🔥🔥  
#SaveBabyCyrus



👍❤️ 270

10 comments 2 shares

👍 Like

💬 Comment

🔗 Share

View more comments



Author  
Save Baby Cyrus

Be sure to sign the new petition demanding Idaho close the case! Please sign & share!! <https://www.change.org/p/dismiss-the-cyrus-anderson-case>



CHANGE.ORG

# **EXHIBIT D67**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

April 23, 2022 · 🌐



New petition to dismiss the case!  
PLEASE SIGN & SHARE!!  
<https://www.change.org/DismisstheCyrusAndersonCase>



CHANGE.ORG

Sign the Petition

Dismiss the Cyrus Anderson Case!

👍❤️👍 14

3 shares

👍 Like

💬 Comment

➦ Share

# EXHIBIT D68

# AN EMPIRICAL REVIEW OF A MEDICAL KIDNAPPING



#SaveBabyCyrus

**Save Baby Cyrus**  
April 24, 2022 · 🌐

Based off of interviews with the family, and Cyrus's Complete Medical Records, family advocates at **Fight for Lilly** document the medical timeline that led to the wrongful kidnapping of Baby Cyrus. Judge the record for yourself... 🙌  
👉 <https://fight4lilly.org/save-baby-cyrus> 👉  
#MedicalKidnap #TheWorldisWatching #SaveBabyCyrus

👍❤️👍 83      4 💬 71 ➦  
Like    Comment    Share

- Most relevant ▾
- Lynnda Weaver**  
Many prayers for this family  
1y Like Reply
  - Nancy Simmons Lucky**  
Prayers for all of you, heard your Dad talk last night ❤️🙏  
1y Like Reply

Most relevant is selected, so some comments may have been filtered out.

Write a comment...  
🗨️ 😄 📷 📺 📹 ➦

# EXHIBIT D69

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Not yet rated (3 Reviews)

Photos

See all photos



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Save Baby Cyrus

April 25, 2022 · 🌐

Baby Cyrus belongs with his parents...  
Tell Judge Fortier to DISMISS THE CASE!  
PLEASE SIGN THE NEW PETITION & SHARE!  
<https://www.change.org/DismisstheCyrusAndersonCase>



👍❤️ 104

4 comments 17 shares

👍 Like

💬 Comment

➦ Share

# **EXHIBIT D70**

**Intro**

Family Support Page for #SaveBabyCyrus

 Page · Cause

 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating - 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus  
April 26, 2022 · 🌐

What to do when CPS comes after you?  
LEARN YOUR RIGHTS & PROTECT YOUR FAMILY!

**Parental Rights**

**When dealing with Child Protective Services  
YOU HAVE RIGHTS!!**

You have the right to deny entrance into your home without a valid warrant.

You have the right to refuse to speak with anyone or allow access to your children without your attorney present.

You have the right to DUE PROCESS including a fair & impartial trial BEFORE you agree to do what they say.

**YOU HAVE THE RIGHT TO FIGHT BACK!**



  150

8 comments 28 shares

 Like

 Comment

 Share

# EXHIBIT D71



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

- 📄 Page · Cause
- 🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)
- ★ Rating · 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus  
April 27, 2022 · 🌐

SAVE BABY CYRUS: An Empirical Review of a Medical Kidnapping - <https://fight4lilly.org/save-baby-cyrus>



👍❤️ 48

1 comment 7 shares

- 👍 Like
- 💬 Comment
- ➦ Share

# EXHIBIT D72

**Intro**

Family Support Page for #SaveBabyCyrus

-  Page · Cause
-  [freedomman.org/cyrus](https://freedomman.org/cyrus)
-  Rating · 5.0 (6 Reviews) 

**Photos**

[See all photos](#)



 Save Baby Cyrus  
April 28, 2022 · 🌐

"And you shall know the truth, and the truth shall make you free." ~ John 8:32 ~  
 SAVE BABY CYRUS: An Empirical Review of a Medical Kidnapping - <https://fight4lilly.org/save-baby-cyrus>  
 #EXPOSECPs #MedicalKidnap #SaveBabyCyrus



👍❤️ 51

8 shares

-  Like
-  Comment
-  Share

# EXHIBIT D73

 Save Baby Cyrus

**Intro**

Family Support Page for #SaveBabyCyrus

---

**1** Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) **1**

**Photos** [See all photos](#)



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 Save Baby Cyrus  
April 28, 2022 · 🌐

Baby Cyrus belongs with his parents...  
Tell Judge Fortier to DISMISS THE CASE!  
PLEASE SIGN THE NEW PETITION & SHARE!!  
<https://www.change.org/DismisstheCyrusAndersonCase>



  56

1 comment 5 shares

 Like  Comment  Share

# EXHIBIT D74

Intro

Family Support Page for #SaveBabyCyrus

- 📄 Page · Cause
- 🌐 [freedomman.org/cyrus](http://freedomman.org/cyrus)
- ★ Rating · 5.0 (6 Reviews)

Photos

See all photos



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Save Baby Cyrus  
April 28, 2022

👶👶👶 BABY CYRUS will turn 1 year old this Sunday, May 1st! We are going to have a celebration potluck at Tully Park in Meridian on Sunday, May 1st @ 5:00 pm. We will have #savebaby Cyrus t-shirts available.

RSVP & Invite Your Friends - <https://fb.me/e/1M5tCEmF>

If you can't make it in person, be sure to check out the virtual party - <https://facebook.com/events/s/baby-cyrus-1st-birthday-virtua/560731858728077/>

Cyrus' 1st Birthday - Amazon Birthday Gift List - [https://www.amazon.com/\\_/birthday/3L7V7PZTV30ED/guest-view](https://www.amazon.com/_/birthday/3L7V7PZTV30ED/guest-view)



# Baby Cyrus' 1st Birthday Party!

Sunday, May 1st at 5:00pm  
Tully Park - Meridian

**SAVE BABY CYRUS T-SHIRTS AVAILABLE!**

**POTLUCK, CELEBRATION, CASE UPDATES, CAKE & FUN!**

# EXHIBIT D75

### Save Baby Cyrus

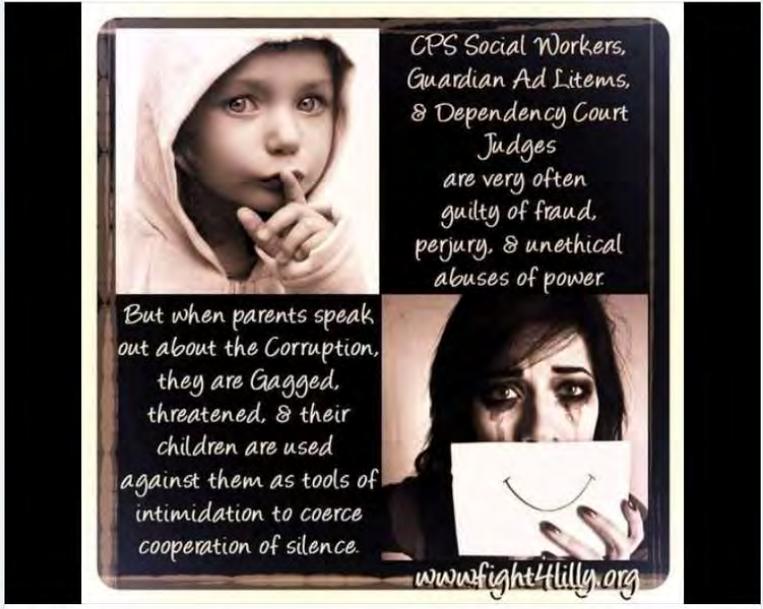
Page · Cause  
[freedomman.org/cyrus](https://freedomman.org/cyrus)  
Rating · 5.0 (6 Reviews)

#### Photos [See all photos](#)



### Save Baby Cyrus

April 29, 2022 ·  
Closed doors and gag orders breed Government Corruption!! #SAVEBABYCYRUS  
#MEDICALKIDNAP  
<https://fight4lilly.org/save-baby-cyrus>



20  
7 shares

# EXHIBIT D76

### Save Baby Cyrus

#### Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

#### Photos

[See all photos](#)



### Save Baby Cyrus

April 29, 2022 · 🌐

Based off of interviews with the family, and Cyrus's Complete Medical Records, family advocates at [Fight for Lilly](#) document the medical timeline that led to the wrongful kidnapping of Baby Cyrus.

Judge the record for yourself... 🙌

👉 <https://fight4lilly.org/save-baby-cyrus> 🙌

#MedicalKidnap #TheWorldisWatching #SaveBabyCyrus

## AN EMPIRICAL REVIEW OF A MEDICAL KIDNAPPING



### #SaveBabyCyrus

10 month old, Cyrus Anderson, is home with his parents; after enduring almost a week long medical kidnapping in March 2022 - at the hands of Child Protective Services and St. Luke's Children's Hospital in Boise, Idaho.

His parents, 21 year old Marissa, and 22 year old Levi, are left reeling in the aftermath of such a heart wrenching and intense battle for their baby boy.

👍❤️🙌 32

1 comment 7 shares

👍 Like

💬 Comment

➦ Share

# **EXHIBIT D77**

**Intro**

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](http://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos See all photos



Save Baby Cyrus  
April 29, 2022

Celebrate Baby Cyrus! 🥳

In-person Party - <https://fb.me/e/67UCp8eRv>

Virtual Party - <https://facebook.com/events/s/baby-cyrus-1st-birthday-virtua/560731858728077/>



# EXHIBIT D78

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews)

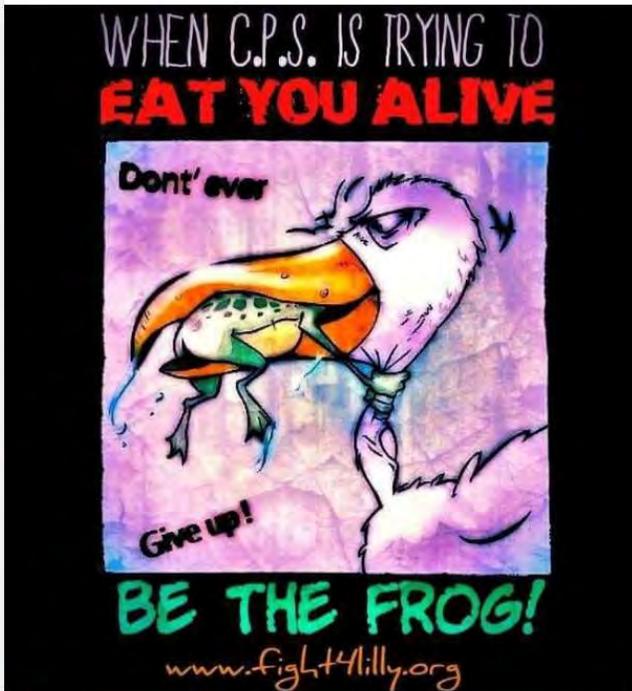
Photos

See all photos



Save Baby Cyrus  
April 30, 2022

<https://fight4lilly.org/save-baby-cyrus>  
#SAVEBABYCYRUS #MEDICALKIDNAP



👍❤️👍 55

1 comment 1 share

# EXHIBIT D79

**Intro**

Family Support Page for #SaveBabyCyrus

📄 Page · Cause

🌐 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

**Photos**

[See all photos](#)



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 Save Baby Cyrus

May 2, 2022 · 🌐

Court is a week from TODAY... 5/9/2022  
THIS is the evidence: [www.fight4lilly.org/save-baby-cyrus](http://www.fight4lilly.org/save-baby-cyrus)  
What do you say? Nutritional neglect?  
Or dismiss the case? 🙄  
If you choose the latter... 🙄  
Tell the judge by signing the petition - <https://www.change.org/p/dismiss-the-cyrus-anderson-case>  
Or show up in person and make your voice heard through your presence at the courthouse - <https://fb.me/e/1RW1RZMg3>  
Or BOTH 🙄  
#SaveBabyCyrus #ExposeCPS #MedicalKidnap



#SaveBabyCyrus

👍❤️🙄 123

6 comments 9 shares

# EXHIBIT D80

**Save Baby Cyrus**

**Intro**

Family Support Page

Page Cause

freedomman.org/cyrus

Rating 5.0 (6 Reviews)

**Photos**

**Save Baby Cyrus's Post**

**Save Baby Cyrus**  
May 4, 2022

📢 UPDATE!!! CASE DISMISSED!!! 📢  
 Judge Fortier DISMISSED the case today and Baby Cyrus is finally free!! 🎉🎉🎉  
 No more court! No more CPS!! 🙏  
 The family says, "We have no words to express our heartfelt THANKS and GRATITUDE for everyone involved who has supported our family!" 🙏❤️🙏  
 Today is a glorious day! 🎉  
 More info in this article and more to come!  
<https://freedomman.org/~/arc.../baby-cyrus-case-dismissed/>  
 #SaveBabyCyrus #MedicalKidnap #EXPOSECPS

👍❤️ 1.3K      227 comments   324 shares

👍 Like      💬 Comment      ➦ Share

Most relevant ▾

# **EXHIBIT D81**

Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](http://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus  
May 11, 2022

Can you say Virtue Signaling in an attempt to cover fraud? 😡  
 Donating the money to the same agency that is a part of the hospital and are the ones that really did make false statements? They lied. Now they wanna cover it up. Proof is in the medical records  
 --> [www.fight4lilly.org/save-baby-cyrus](http://www.fight4lilly.org/save-baby-cyrus)  
 #ExposeMedicalKidnap  
 #SaveBabyCyrus



KTVB.COM  
 St. Luke's files lawsuit against Ammon Bundy and others, over 'intimidation, disruption'

81 reactions 20 comments 5 shares

- Like
- Comment
- Share

# **EXHIBIT D82**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

📌 Page · Cause

🌐 [freedomman.org/cyrus](https://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

Photos

[See all photos](#)



Save Baby Cyrus

June 12, 2022 · 🌐



Marissa Anderson is with Levi Anderson.

June 12, 2022 · 🌐

Health update on baby Cyrus:

We've been getting a lot of messages from friends and supporters, asking for a health update on baby Cyrus, so I thought we'd update everyone at once.

This is going to be a very raw and vulnerable post, but I feel it is important as our family can use a lot of prayer for our son.

Back in April, Cyrus was diagnosed with Cyclic Vomiting Syndrome by our family doctor and a GI doctor. Cyclic Vomiting Syndrome is a series of vomiting episodes and severe migraine that recur in a predictable pattern. Cyrus would be in an episode for several days, then he'd be 100% well for a few days, then get sick on the 4th day, lasting for several days. This repeated pattern is one that couldn't be broken even with medications that were prescribed (which made things worse), but Craniosacral therapy seemed to help shorten the days he was sick. He still got sick on every 4th day, but the Craniosacral therapy made it less severe. His doctors believed this to be a genetic issue, and something we can't cure, but only ease the symptoms and hope he grows out of it. During his CPS case, the doctors told the social workers that this was completely medical, the parents did nothing to neglect or abuse Cyrus and that there is no reason for CPS to be involved, but they continued to pursue the case—in spite of knowing that information.

Once the case was finally dismissed and our family relocated, we started researching more on Cyrus' condition, and looking for doctors who are familiar with it. We know WHAT he has, but we don't know WHY it is happening, or what the root cause is. The days that he's in his vomiting episodes are incredibly difficult and hands on for the entire family. Everyone, (many

Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- freedomman.org/cyrus
- Rating · 5.0 (6 Reviews)

Photos

See all photos



times including his grandparents, aunts and uncles), will drop everything to help care for him and make him as comfortable as we can. But during his days of being well, it's like he's never even been sick before. He gains weight so fast, eats anything he can get his hands on, has so much energy and is the happiest little baby you'll ever see.

We were referred to an amazing doctor who spotted an abnormality in his lab tests and pointed to the possibility of a Mitochondrial Disease. He believes Cyrus can have a possible mitochondrial defect, which would explain why his symptoms started so suddenly when he had zero signs of health complications from birth and in the first several months of his life.

After diving into the research on this disease, I found a study which concluded that 88% of people with Cyclic Vomiting Syndrome have serious mitochondrial defects. The mitochondria are like little batteries for the body. They take food and oxygen and convert them into energy that the body needs to operate. When mitochondria cannot convert food and oxygen into life-sustaining energy, cell injury and even cell death follow. When this process is repeated throughout the body, organ systems begin to fail and even stop functioning.

Mitochondria exist in every cell of the body, and oftentimes when just very few mitochondria have defects, symptoms show way later in life, if at all. The earlier in life that symptoms manifest, the higher load of defected mitochondria there are. The bigger organs in the body contain more mitochondria, so often get affected first. For Cyrus, it seems to be primarily neurological and gastrointestinal.

This disease is not something widely understood by the medical field and the research on it is not as broad as most other diseases, but we have been researching everything there is to know on the matter.

Doctors have concluded that there is no cure, and in children with this disease (especially babies), they rarely survive past childhood.

We don't have an official diagnosis. Even if he is diagnosed with mitochondrial disease, maybe it will be a less severe case. Our current doctor has ordered more tests, including genetic testing to try and see exactly if and which mitochondria can be defective, and how.

We don't believe that our answers will come from traditional western medicine or the allopathic method of care. During two inpatient hospital stays at St. Luke's, that were both about 4 days long, they were never able to diagnose anything or give us any answers, but our family doctor gave him his first diagnoses of Cyclic Vomiting Syndrome on his first appointment, a diagnosis which another MD and Nurse Practitioner later agreed upon. Our new doctor was able to suggest we look further into mitochondrial defects and put him on these amazingly helpful supplements, also on the first appointment. Traditional allopathic hospitals have given us no help, only further confirming our already existing beliefs and knowledge on that. As most of you know, we had no choice on that last hospital stay for Cyrus.

Although we're glad to possibly be finding answers, learning all of this information has been incredibly disheartening. Even the slight possibility of our child having a life threatening disease with no known cure, is something you never think can happen to you. We are praying for God to lead us to the answers Cyrus needs, to know exactly what it is and to find a cure or a way to thrive with this.

We have prayed for guidance to find the right doctors and the right information during our research.

**Intro**

Family Support Page for #SaveBabyCyrus

**1** Page · Cause

 [freedomman.org/cyrus](http://freedomman.org/cyrus)

★ Rating · 5.0 (6 Reviews) ⓘ

**Photos**

[See all photos](#)



We pray often for miraculous healing. I told my husband that if a miracle is how Cyrus will receive healing, then it doesn't matter how severe or hopeless the diagnosis is, because nothing is too big for God, and nothing is out of His scope of power.

My husband anoints Cyrus with oil and we pray healing over him every night, and there is constant prayer throughout the day. Maybe God has a much bigger plan through this that we can't even see right now? Maybe this will just be a difficult journey that builds our faith and teaches us to depend on God completely. When the world tells you there is no hope, as Christian's, we know there is always hope through Christ, and it is in situations like this that we have nowhere else to turn.

God has brought us this far and we know He will never leave nor forsake us.

There is some good news and hope, though. After finding all of this information out, we prayed for direction, peace and a sign of hope. Our current doctor had Cyrus start on a combination of natural supplements that help support mitochondrial function, and after taking them for a day, he went into another episode the next day—on day 4, like he always does. We were pretty discouraged, but that evening, we saw a beautiful rainbow over our house. Gods sign of hope. I remember seeing a huge rainbow the day before we got Cyrus back from CPS. We felt a boost of encouragement and that night, Cyrus' vomiting episode ended. In less than 12 hours. His shortest episode yet. Wow. This was the boost of encouragement we needed. Cyrus had so much energy and was so happy! He hasn't been on this supplement for very long, but we're hoping to see a change in his episodes moving forward! God has always given us hope right before a breaking point. He knows how much we can handle. What an amazing God we serve.

In conclusion, we are waiting to finish some more testing for Cyrus to see if there is a possible diagnosis, we will continue with the supplements he is on as we research more treatments and get connected with doctors who are experts in this area, and we are watching Cyrus gain weight very well. He's growing and enjoying his days when he's healthy and we are just spending as much time as possible with him as a family, building memories and soaking up every precious moment we have with him. Life is so precious and we want to treasure and enjoy it to the fullest. My dad always tells us that the only thing we take with us to heaven is our memories, so to invest into making good ones.

There is a lot of information we learned in the hours of research (I've been staying awake through most nights, reading through doctors studies, articles, scientific studies, reading through Cyrus' lab results and everything I can find on the matter), and it is too much to share the full explanation of his symptoms and everything we've learned, but if anyone has any experience with this diagnosis, symptoms, treatments, or know of good doctors, please let me know. We are open ears to learn everything there is to know and would appreciate any information you might have. We are willing to do anything and everything it takes to help our son. No matter the scope, no matter what it costs or what sacrifices we have to make to get him what he needs, we will do it in a heartbeat.

Thank you to everyone who took the time to read this all the way through. We have so much gratitude for all of you who have stuck with our family and continue to support us.

We ask for your prayers for our son and for our family as we navigate lots of life changes. For those who have asked what specifically they can pray for, prayers for strength, wisdom, guidance, peace, hope and emotional bandwidth are so needed and appreciated!

# EXHIBIT D83

Save Baby Cyrus

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

facebook.com/savebaby.cyrus

Rating · 5.0 (6 Reviews)

Photos

See all photos



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Save Baby Cyrus

August 21, 2019

Update from Baby Cyrus' mem...



Marissa Anderson

August 17, 2019

August update on Baby Cyrus

This last month has mainly just consisted of running tests on Cyrus. One of the test results showed that he tested positive for C. DIFF. (basically a bacteria infection in the colon). We can't know for sure how he got it, but his current doctor thinks it's possible that he picked up the infection during one of his hospital stays at St. Luke's. (Hospitals are one of the most common places where C. DIFF. is contracted.)

Most specifically, we were originally concerned when Baby Cyrus forced NG tube (that St. Luke's forced in him) fell out, and according to the "nanny girls" that the Idaho Department of Health and Welfare (IDHW) made us agree to in order to get Baby Cyrus back, we had to return to the IDHW for them to put the NG tube back in. The nurse, Tracy Jungman, literally just grabbed the tube, which had been flopping around touching things and getting dirty, shoved it back into his nose and down into his stomach. She didn't even gloves, she didn't sanitize the tube, and she didn't switch the tube out for a new one, or anything that would seem obvious for sanitary purposes. We expressed our concern and she just played it off as if it was nothing. According to the American Association of Pediatrics, prolonged use of an NG tube is a common cause of C. DIFF. infection.

We have started some natural treatments for C. DIFF, and have a follow-up appointment this upcoming week to see if the treatment is working. Although we don't know if or how it is related to his Cyclic Vomiting Syndrome, we know it most certainly does not help to have this infection on top of everything he's dealing with health-wise.

We also finally got in with a geneticist, ran the first tests, and are waiting for results there. We're hopeful to find more answers.

Last month, Cyrus' doctor put him on a combination of supplements—Ca2D and L carnitine, and his vomiting episodes were less severe but happening at the same frequency.

We took him off of the supplements for a few days while we were doing some of his tests, and he had one of his worst episodes in the last couple of months. We immediately put him back on the supplements, and his doctor visited St. Luke's, which he thought would help (from what he could see on the latest test results), and Cyrus was doing much better. He went the longest he's ever gone in between episodes, the severity is down, and he's doing really well with weight gain this last month.

It seems that his vomiting is being spaced out more. We're very encouraged and hopeful to find more answers as we continue with testing, and his current primary doctor here in Florida has been absolutely amazing to work with. He seems to be taking us on the right path to find answers. We are grateful for him and for all the doctors and health specialists who have helped us along this journey.

This month has given us more hope, and we're so grateful to have Cyrus in our custody and be able to choose a more natural approach to his healing, which is proving to be a much better option for him. Without your help, support, love and concern, we never would have got Cyrus back in the first place. As we have learned, and as has been masterfully described in Steve Peter's documentary "Time Little Ones," our system in America is not designed to protect children nor to restore family unity. It does just the opposite.

Thank you to everyone for your care and concern for Cyrus, for reaching out to check up on him, and for your continued prayers, which have helped tremendously. We're so grateful for each and everyone one of you, and your messages absolutely mean the world to us!

Marissa Chenaya (Baby Cyrus' mom)

P.S. My court date for my criminal trial, where I am being criminally charged for "resisting and obstructing an officer," because I wouldn't give Baby Cyrus to Officer Steve Hansen who wanted to forcefully kidnap him from my hands, is still being actively fought. The new hearing has been delayed until October 1st. Please pray for our legal team that they can help us get this case rightfully dismissed. Imagine being charged criminally for not complying with someone who is illegally kidnapping your child. That is what is happening in this case. And I was always told that America was the "land of the free."

👍❤️👍 213

14 shares

# EXHIBIT D84

### Save Baby Cyrus

#### Intro

Family Support Page for #SaveBabyCyrus

- Page · Cause
- [freedomman.org/cyrus](http://freedomman.org/cyrus)
- Rating · 5.0 (6 Reviews)

#### Photos

[See all photos](#)



### Save Baby Cyrus

September 12, 2022 ·



IDAHOSTATESMAN.COM

Parents in child welfare case seek \$100,000 from Meridian for unlawful police treatment

414 likes

50 comments 33 shares

- Like
- Comment
- Share

[View more comments](#)

# EXHIBIT D85



# **EXHIBIT D86**



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Rating · 5.0 (6 Reviews)

Photos

[See all photos](#)



Save Baby Cyrus

January 13, 2023 · 🌐



After ten months of fighting to get the cases dropped against Marissa, Levi, and Miranda it has finally happened! This new chapter is justice for Baby Cyrus, starting our lawsuits against the City of Meridian, The Idaho PD, Idaho Department Of Health and Welfare, and more. The Rodriguez's and Anderson's are moving forward in every way possible to make sure these systems are held accountable for the sake of our family and every families' rights.

<https://www.givesendgo.com/babycyruslegal...>

#justiceforbabycyrus  
#SaveBabyCyrus



GIVESENDGO.COM

**Click here to Give now to Lawsuits Connected to Baby Cyrus by Risa Rodriguez**  
Since the kidnapping of Baby Cyrus March 11, 2022, the Rodriguez-Anderson family has fough...

Team Rydder Pomerico and 166 others

19 comments 6 shares



[View more comments](#)

# **EXHIBIT D87**

Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

freedomman.org/cyrus

Rating · 5.0 (6 Reviews)

Photos

See all photos



Save Baby Cyrus  
May 1, 2023

Happy Birthday Cyrus!



Marissa Anderson  
May 1, 2023

Happy Birthday to our sweet little Cyrus! 🥰🥰🥰 His first birthday was spent still in the custody of the state, so this is such a blessing to celebrate our little guy in peace this year! Lots of reasons to give thanks today! We are so blessed! We had a beautiful day spent as a family and I made Cyrus a special paleo chocolate cake. He was very excited about that! 😊 We're so honored to be your parents, and I can't wait to see how God uses your life to glorify Him! "Thus saith the LORD to his anointed, to Cyrus, whose right hand I have holden, to subdue nations before him; and I will loose the loins of kings...I will go before thee, and make the crooked places straight...that thou mayest know that I, the LORD, which call thee by thy name, am the God of Israel." Isaiah 45:1-3

# EXHIBIT D88



Save Baby Cyrus



Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Not yet rated (3 Reviews)

Photos

See all photos



Save Baby Cyrus

May 4, 2023 · 🌐

A year ago today! 🥳



Save Baby Cyrus

May 4, 2022 · 🌐

🥳 UPDATE!!! CASE DISMISSED!! 🥳

Judge Fortier DISMISSED the case today and Baby Cyrus is finally free!! 🥳🥳🥳

No more court! No more CPS!! 🥳🥳

The family says, "We have no words to express our heartfelt THANKS and GRATITUDE for everyone involved who has supported our family!" 🥳🥳🥳

Today is a glorious day! 🥳

More info in this article and more to come!

<https://freedomman.org/.../arc.../baby-cyrus-case-dismissed/>

#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

👍❤️🥳 247

18 comments 3 shares

# EXHIBIT D89



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

Page · Cause

[freedomman.org/cyrus](https://freedomman.org/cyrus)

Rating - 5.0 (6 Reviews)

Photos

[See all photos](#)



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Save Baby Cyrus

May 10, 2023

For everyone who has followed the Baby Cyrus case (and even those who are just learning about it), this is a very important virtual town hall to attend this evening.



Ammon Bundy

May 10, 2023

You won't want to miss this!

**Happening TODAY — May 10th!**



If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th.

Government Subsidized Child Trafficking  
Wednesday May 10th, 2023 9:00 PM Eastern Time  
Wednesday May 10th, 2023 8:00 PM Central Time  
Wednesday May 10th, 2023 7:00 PM Mountain Time  
Wednesday May 10th, 2023 6:00 PM Pacific Time

Join Zoom Meeting  
<https://us02web.zoom.us/j/82868844718...>

Meeting ID: 828 6884 4718  
Passcode: 914511

# EXHIBIT D90

### Save Baby Cyrus's Post

 Save Baby Cyrus  
November 14, 2023

From Baby Cyrus' mom:

At the beginning of this year, we did a public records request for the Idaho Department of Health and Welfare (IDHW) records for Cyrus' records which we have the right to as his parents. Their response was that it would take too many hours of legal review to provide them for free, so we'd have to pay for the legal review. We tried to go back and forth on it, and Levi ended up paying the \$530 that they requested for legal review. They cashed the check and sent an email saying that they needed more than 10 business days to complete the legal review and that they'd have it ready by 11/9. IDHW records requests are not supposed to take more than 3 business days to be released, so that's why they had to send me a written notice that they would need longer (10 days).

11/9 comes and they have not sent the records, so I emailed them on 11/12 telling them that I haven't received the records yet. There was no response, so I call yesterday and talked to a lady at IDHW that says, "Sorry, they're not ready." I pushed her to check on the status, and she said she'd call me back the next day (today). I also followed up that call with another email. She did not call me back today, so I call again and the same lady says that the office has all come down with something and they've been slow. So, I asked for a new deadline, and she said she couldn't give me a new deadline or even a time estimate because it's "just a lot of documents."

It was left open ended, and they gave me no guarantee on when we will get these records. I suspect these records could have some important evidence that they don't want us to see, and they may be trying to cover it up or wait us out. They did this before when Levi tried to get the medical records from St. Luke's, and they wouldn't give the records over until he persisted in person and waited in the Saint Luke's waiting room for hours.

I'm afraid that if we don't aggressively follow up or make it public, that we may never get those records, or it may be a very long time from now.

I will keep calling in to demand the records, but I would truly appreciate it if some of my friends could also call Idaho Department of Health and Welfare and ask them to release the medical records of Cyrus Anderson to his parents who paid for them already. You can request to speak with the supervisor as well.

I believe IDHW has several different numbers you can call, but I called (208) 334-5700.

Thank you for helping!

    66

14 comments 10 shares

 Like

 Comment

 Share

Most relevant ▾

# **EXHIBIT D91**

**Intro**

📄 Page · Nonprofit organization  
🌐 [freedomman.org](https://freedomman.org)  
★ Not yet rated (1 Review) ⓘ

**Photos**

[See all photos](#)



May 4, 2023 · 🌐

Crazy that this was exactly a year ago!



 Save Baby Cyrus

May 4, 2022 · 🌐

🎉 UPDATE!!! CASE DISMISSED!! 🎉  
Judge Fortier DISMISSED the case today and Baby Cyrus is finally free!! 🙌🙌🙌  
No more court! No more CPS!! 🙌

The family says, "We have no words to express our heartfelt THANKS and GRATITUDE for everyone involved who has supported our family!" 🙌❤️🙌

Today is a glorious day! 🙌  
More info in this article and more to come!

<https://freedomman.org/.../arc.../baby-cyrus-case-dismissed/>  
#SaveBabyCyrus #MedicalKidnap #EXPOSECPS

👍❤️🙌 15

1 comment 3 shares

👍 Like      💬 Comment      ➦ Share

# **EXHIBIT D92**

**Intro**

**Page** · Nonprofit organization  
[freedomman.org](http://freedomman.org)  
Not yet rated (1 Review)

**Photos**

[See all photos](#)



 Freedom Man Press  
May 6, 2023 · 🌐

<https://youtu.be/XKVMvmkRoe4>



YOUTUBE.COM

**New Video Evidence Proves that Baby Cyrus was a "Healthy Baby" When Kidnapped By Meridian Police**

👍 🗨️ 🗨️ 13

2 shares

👍 Like    🗨️ Comment    ➦ Share

# **EXHIBIT D93**



**Intro**

- 📄 Page · Nonprofit organization
- 🌐 [freedomman.org](http://freedomman.org)
- ★ Not yet rated (1 Review) ⓘ

**Photos**

[See all photos](#)



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May 7, 2023

From Diego:

This Wednesday night I am going to give a LIVE Presentation via ZOOM showing everything that happened during the Baby Cyrus case, including things we've not shared before, and many things we've learned and uncovered as we've researched the Government Subsidized Child Trafficking Ring that exists in America—and particularly with the Idaho Department of Health and Welfare.

Due to the increased interest over this case because of Ammon Bundy's warrant—which was fraudulently issued by Judge Lynn Norton (who is a serial violator of the Constitution)—we have noticed, both online and in Social Media, that there is still a ton of misunderstanding and confusion about the Baby Cyrus case. Even people who were involved in helping Baby Cyrus get returned to his parents are confused about important details and we'd like to make sure it all gets cleared up for everyone.

A few months ago, I was asked to give a presentation about the Baby Cyrus story and child trafficking to a local freedom group here in Orlando, Florida. The presentation was very well received and left most of the audience with their jaws dropped. I am going to give that same presentation LIVE this Wednesday via Zoom—so every one of you can participate. During the presentation you will learn:

1. The real reason why Baby Cyrus was kidnapped (no, he wasn't "misdiagnosed"),
2. What other countries have Government subsidized child trafficking,
3. How much money St. Luke's has received for having Baby Cyrus in their possession,
4. How much money each kidnapped child is worth once kidnapped,
5. How and why homosexuals are adopting most children from CPS,
6. What types of children are being targeted by CPS (see if you're on the list),
7. How you can protect your family and ensure your children never get taken by CPS.

In addition to giving this presentation, I will take LIVE Question and Answers on the spot and in realtime. Using the ZOOM platform, we can have a "Virtual Townhall" style event, and I can take your questions LIVE.

Government Subsidized Child Trafficking  
 Wednesday May 10th, 2023 9:00 PM Eastern Time  
 Wednesday May 10th, 2023 8:00 PM Central Time  
 Wednesday May 10th, 2023 7:00 PM Mountain Time  
 Wednesday May 10th, 2023 6:00 PM Pacific Time

Join Zoom Meeting  
<https://us02web.zoom.us/j/82888844718...>

Meeting ID: 828 8884 4718  
Passcode: 914511

Diego Rodriguez  
Freedom Man Press

P.S. I will be making a pretty big announcement that you will want to know about on the live Zoom presentation. I look forward to seeing you then!

P.P.S. Yes, as you probably have already heard, not only does Ammon have a warrant out for his arrest in this case, but Holland and Hart law firm has just filed a motion to put me in contempt of court so they can arrest me as well.

US02WEB.ZOOM.US

Join our Cloud HD Video Meeting

# EXHIBIT D94



Save Baby Cyrus



Intro

Family Support Page for #SaveBabyCyrus

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[freedomman.org/cyrus](https://freedomman.org/cyrus)

Rating - 5.0 (6 Reviews)

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Save Baby Cyrus

May 10, 2023 · 🌐



For everyone who has followed the Baby Cyrus case (and even those who are just learning about it), this is a very important virtual town hall to attend this evening.



Ammon Bundy

May 10, 2023 · 🌐

You won't want to miss this!

🔴 Happening TODAY — May 10th!



If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th.

Government Subsidized Child Trafficking  
Wednesday May 10th, 2023 9:00 PM Eastern Time  
Wednesday May 10th, 2023 8:00 PM Central Time  
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Wednesday May 10th, 2023 6:00 PM Pacific Time

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# **EXHIBIT D95**

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May 10, 2023

Today is the day!



May 10, 2023

You won't want to miss this!

🔴 Happening TODAY — May 10th!



If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th.

Government Subsidized Child Trafficking  
Wednesday May 10th, 2023 9:00 PM Eastern Time  
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Wednesday May 10th, 2023 6:00 PM Pacific Time

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# **EXHIBIT D96**

**Intro**

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Replay from the live Townhall last week:

 FREEDOMMAN.ORG  
**Government Subsidized Child Trafficking | Freedom Man Press**  
Government Subsidized Child Trafficking is a presentation given by Diego Rodriguez about the true nature of CPS (Child Protective Services). The links from the presentation are below...

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 Luis Ewing  
LUIS EWING CPS FINANCIAL CRIMES INVESTIGATION SQUADS: These groups are only for parents whose Parental Rights have been Terminated and they no longer get to see or visit their children for that once a week 2 hour visit and/or their children have ahead... [See more](#)

 LUIS EWING CPS FINANCIAL CRIMES INVESTIGATION SQUADS

45w Like Reply

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# **EXHIBIT D97**

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 Freedom Man Press  
May 18, 2023 · 

"Erik Stidham, the Holland and Hart Attorney for St. Luke's Hospital in the Bundy/Rodriguez Case, to be Investigated for Criminal Complaints for "Intimidation by False Assertion of Authority"

Read article here:

[STLUKESEXPOSED.COM](http://STLUKESEXPOSED.COM)

**Erik Stidham Criminal Complaints | St Luke's Exposed**

Erik Stidham Criminal Complaints

  7

20 comments 5 shares

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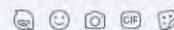
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 Heidi Miller-Lehrman  
Judicial Code of Conduct--- a Judge has sworn and OATH to uphold the constitution, Laws and statutes....

48w Like Reply

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# **EXHIBIT D98**



# Freedom Man Press

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Freedom Man Press  
May 20, 2023

The case against Ammon and I has proven to be an absolute GOLD MINE for those looking for genuine evidence of government corruption, collusion, and even conspiracy against everyday citizens. We have already seen how the Government Subsidized Child Trafficking ring funds the entire system, from cops to judges, to doctors and hospitals, and dozens of additional bureaucracies.

Yesterday I posted an article demonstrating how Dirty Erik He/Him/His Stidham, attorney for Holland and Hart law firm representing St. Luke's hospital, is going to have to be investigated for genuine crimes he committed. And there will be more criminal complaints against him, as he also perjured himself on multiple occasions. So yes, wicked lawyers are used to attack and harm innocent citizens.

However, even though those who have been involved in court proceedings know that the courts in America are one of the most corrupt institutions in our country, relatively speaking FEW have actually experienced it firsthand and it is impossible to explain in a 140 character tweet, or a 15 second TikTok—which is the attention span that most Americans have today.

In this lawsuit, the judge who is presiding over the case has demonstrated herself to be totally corrupt and biased on multiple occasions. However, at least two of them are so egregious and so obviously UNLAWFUL that they merit formal complaints against her of Judicial Misconduct. I have detailed, as concisely as possible, what those two complaints against her are in this article:

[STLUKESEXPOSED.COM](http://STLUKESEXPOSED.COM)

**Judge Lynn Norton Judicial Misconduct | St Luke's Exposed**

[Judge Lynn Norton Judicial Misconduct](#)

# **EXHIBIT D99**

### Save Baby Cyrus's Post

 Save Baby Cyrus  
November 14, 2023

From Baby Cyrus' mom:

At the beginning of this year, we did a public records request for the Idaho Department of Health and Welfare (IDHW) records for Cyrus' records which we have the right to as his parents. Their response was that it would take too many hours of legal review to provide them for free, so we'd have to pay for the legal review. We tried to go back and forth on it, and Levi ended up paying the \$530 that they requested for legal review. They cashed the check and sent an email saying that they needed more than 10 business days to complete the legal review and that they'd have it ready by 11/9. IDHW records requests are not supposed to take more than 3 business days to be released, so that's why they had to send me a written notice that they would need longer (10 days).

11/9 comes and they have not sent the records, so I emailed them on 11/12 telling them that I haven't received the records yet. There was no response, so I call yesterday and talked to a lady at IDHW that says, "Sorry, they're not ready." I pushed her to check on the status, and she said she'd call me back the next day (today). I also followed up that call with another email. She did not call me back today, so I call again and the same lady says that the office has all come down with something and they've been slow. So, I asked for a new deadline, and she said she couldn't give me a new deadline or even a time estimate because it's "just a lot of documents."

It was left open ended, and they gave me no guarantee on when we will get these records. I suspect these records could have some important evidence that they don't want us to see, and they may be trying to cover it up or wait us out. They did this before when Levi tried to get the medical records from St. Luke's, and they wouldn't give the records over until he persisted in person and waited in the Saint Luke's waiting room for hours.

I'm afraid that if we don't aggressively follow up or make it public, that we may never get those records, or it may be a very long time from now.

I will keep calling in to demand the records, but I would truly appreciate it if some of my friends could also call Idaho Department of Health and Welfare and ask them to release the medical records of Cyrus Anderson to his parents who paid for them already. You can request to speak with the supervisor as well.

I believe IDHW has several different numbers you can call, but I called (208) 334-5700.

Thank you for helping!

   66

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# **EXHIBIT D100**



# Save Baby Cyrus

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## Intro

Family Support Page for #SaveBabyCyrus

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Today, our sweet Baby Cyrus turns 3 years old! This past year of his life has been absolutely incredible and beautiful, and I feel so honored to be ... See more

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Public



Today, our sweet Baby Cyrus turns 3 years old! This past year of his life has been absolutely incredible and beautiful, and I feel so honored to be with him to witness every moment. From his 1st birthday to his 2nd birthday, I had a lot of prayer requests—a lot of difficult things that we needed the Lord to walk us through to help heal Cyrus. By the grace and mercy of God, all of those prayers have been answered. How God is so gracious to us, I really don't know. 🙏🏻 We have some major health updates, but his health journey has been long and wild enough that a whole book could be written about it. Since we don't have that kind of time, I'll give you a synopsis! As most of you know, after we got him home from CPS care, he was in significantly worse condition than when they took him, and we moved to Florida with some serious work cut out for us. We found some of the most amazing holistic doctors and practitioners that worked with him, and we saw immense progress over the first year. The first holistic practitioner and pediatrician helped us to treat the C. Diff infection he had from the hospital and having that cleared made a huge difference in his vomiting episodes. We set out on a gut healing journey and saw steady progress. Then, we started seeing a chiropractor for adjustments a few times a week, and within less than a month, he went over 2 weeks without a vomiting episode, which was huge for him! We felt like he got his life back, and we could see his development increase exponentially. He kept getting better and better and eventually went 3-4 months episode free! It was absolutely amazing and miraculous! It was like we finally had our son back! He was still doing chiropractic, clean eating and supplementation in addition to several other holistic treatments, and as we started to wear him off of it, he had a bit of a relapse and had several more episodes—not nearly as bad as they used to be. We had discussed parasites being a possible root cause when we were back in Idaho, but he was too small to start most of the available parasite protocols, so we sought other treatments. In some God orchestrated events that took place, my dad connected with an amazing and well sought after parasitologist. She put together a custom protocol for his specific symptoms. Since we started him on the protocol, he hasn't had a single episode, we've seen parasites passed, his speech and language development has been significant, he's gained even more weight (he is now above average for his age), and his mood is so much happier! We're so over the moon for the improvements we have seen, and we haven't even finished the protocol yet! It's very long and intensive, but we're sticking to it and can't wait to see what more results will come from it. This has been such an answer to prayer, and as much as we would have loved for Cyrus to be miraculously healed and to move on, the process that the Lord has brought us through over the last couple of years has been very important for our family. We have had to learn so much about health and healing, how God designed our bodies to heal, and we are so much of a healthier family now because of it. I feel more equipped as a mother to be able to manage the health needs of all of my family and to keep us all strong and healthy. I am so grateful for what the Lord has brought us through and for what we've learned on this journey. Lots of tears and sleepless nights came as we tried to navigate the unknown with Cyrus' health issues, but no matter how difficult it was, we were so grateful to be able to have him in our arms and care for him on our terms as parents. I would also like to note that the 3 major things that made the biggest improvement in his healing are all things that the hospital and CPS would never provide—holistic gut healing care, chiropractic work, and parasite cleansing. If you leave loving parents to care for their children, they will go to the ends of the earth to find healing. We are grateful to have had the opportunity to do that! From his 2nd birthday until his 3rd birthday today, prayers have looked a little different. I really don't have much to ask for partly because after losing the most precious thing I had, I realized that nothing else in my world mattered, and once we had our sweet Cyrus back, my desires have never been the same. Through all of this, the Lord taught me contentment and my only ask has been that it stays just like this. With my faith and my family, there is really nothing else I could ask for. As difficult as some of the things we went through have been, now that we are on the other side of it, it really makes each and every moment and experience so much more rich and vibrant, and we experience them with much more gratitude than we ever would have before. I consider that a gift, and for that reason, I thank God for the difficult times. Cyrus, my sweet first born...By looking at you, I think I understand the kind of love that our Heavenly Father has for all of us, and for the first time in my life, I think I understand how God sees me, His child. Thank you for showing your dad and I a love that words can't express but overflows our hearts with joy. I pray you grow up to be a strong man of God, who is honest, hard working, honorable, humble, and kind. I can't wait to see what God has in store for you this next year! I love you so much! Happy birthday, Cyrus James! See less



Give!



204



21



7

Save Baby Cyrus · 0

# EXHIBIT E

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,

Plaintiff(s),

-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,

Defendant(s).

Case No. CV01-22-6789

FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER FOR PERMANENT  
INJUNCTIVE RELIEF FOR  
PLAINTIFFS

In Plaintiffs' Fourth Amended Complaint, Plaintiffs sought injunctive relief in addition to any damages awarded by the jury. The Defendants were allowed to participate in the jury trial on damages including jury selection, opening statements, cross-examination and closing arguments, but all Defendants failed to appear. After seven days of trial on the issue of damages, the jury awarded the Plaintiffs certain monetary relief on their claims. The equitable relief in the form of injunctive relief was not before the jury as injunctive relief is for the Court to decide.

Having reviewed the docket, the admitted facts in the Fourth Amended Complaint due to the Defendants' default in this lawsuit, and being informed by both the evidence presented in the trial on monetary damages as well as the jury's verdicts on the Special Verdict Form, the Court issues its Findings of Fact and Conclusions of Law on the request for permanent injunctive relief.

### **Findings of Fact**

These findings of fact are primarily based on the live testimony and exhibits presented at the jury trial on damages. The exhibits are extensive and set forth the specific "statements" of the Defendants through videos, internet postings, publications, etc. The statements speak for themselves as to who made or published the statement. The statements and publications are too numerous to repeat in this case, but each exhibit was testified to in Court and only the admitted exhibits were relied on by the Court.

The testimony on the underlying events as well as care of the C.A. (the "Infant") were relevant at trial to provide background and context regarding the conduct of the Defendants. These findings of fact are supported by the substantial and competent evidence provided by credible witnesses and exhibits admitted during the trial. The Court will generally refer to the nature of statements and the contents of the statements without citing all the exhibits to support each finding of fact. All exhibits admitted are part of the Court record in this matter.

1. The Plaintiffs brought this action in response to the Defendants' statements and publications made against the named Plaintiffs, the trespass that occurred on

St. Luke's<sup>1</sup> hospitals in Meridian and Boise. The events that started the interactions between Plaintiffs and Defendants centered on the medical care of the Infant.

2. Nurse Practitioner Nadia Kravchuk, the Infant's primary care provider (PCP) saw the ten month old Infant on or about March 1, 2022. The Infant was severely dehydrated and the parents said the baby was vomiting. The Infant had lost approximately 4 pounds since its six-month wellness visit. NP Kravchuk's office was unable to provide the necessary care and IV to rehydrate the Infant in her office. The parents were directed to the St. Luke's Boise Hospital emergency room where the Infant could be rehydrated.
3. The Emergency Room (ER) doctor on duty at St. Luke's determined not only was the Infant severely dehydrated, but the Infant was suffering from severe malnutrition. The ER doctor consulted with the Pediatric Hospitalist on duty, Dr. Erickson, who agreed the Infant should be admitted. Dr. Erickson agreed with the ER doctor's diagnosis of severe malnutrition and dehydration. Dr. Erickson testified the condition of the Infant was dire and without proper medical intervention, the Infant was at risk organ failure and possible death. This was NOT a healthy baby when it arrived at the hospital on March 1, 2022. The parents reported to Dr. Erickson that the Infant was doing well until about 7 months of age and then reoccurring vomiting started and such vomiting would continue for several days. *See*, Exhibit 1, page 12.
4. Dr. Erickson is Board-Certified in both General Pediatrics and Pediatrics Hospital Medicine. She a highly trained pediatric doctor. Dr. Erickson consulted with the parents regarding the condition of the Infant. The parents agreed to the care plan to rehydrate

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<sup>1</sup> The Court will prefer to Plaintiffs St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center Ltd. Collectively as "St. Luke's."

and increase caloric intake for the Infant recommended by Dr. Erickson. At no time did Dr. Erickson threaten the parents to call child support enforcement if the parents did not agree to the treatment plan.

5. The parents did not want the Infant vaccinated. No medical provider vaccinated the Infant and that preference of the parents was respected. There was testimony by Dr. Erickson and NP Jungman, the parents' decision not to vaccinate the Infant did not in any way impact the care plan for the Infant or the respect shown the parents.
6. Prior treatment medical records for the Infant's medical care since birth were not provided by the parents and could not be obtained by Dr. Erickson beyond NP Kravchuk's limited records. This led to some additional tests being run to rule out other potential causes for the Infant's condition. Dr. Erickson noted the Infant was failing to thrive.
7. With proper medical intervention and treatment, including IVs to rehydrate, bottle feedings as well as additional feedings through a nasogastric feeding tube (NG tube), the Infant's medical condition improved.
8. Dr. Erickson arranged for St. Luke's staff and social worker to assist parents apply for and receive Medicaid so there would be no out-of-pocket cost to the family for the Infant's care. The family had no medical bills that were not paid by Medicaid for the Infant's care.
9. Dr. Erickson also arranged for a home health nurse to come to the Infant's home to check on the progress of the child and to help with any further needs for the child and family members caring for the child. Dr. Erickson explained, and the parents seemed to understand, that continuing the additional caloric intake was critical as the feeding

plan being used prior to the hospitalization was insufficient to allow the Infant to grow and thrive. Regular weight check-ins were also critical for determining if the Infant was or was not continuing with gaining weight as he had done in the hospital. The parents were trained on how to complete additional feedings via the NG tube. The parents were also advised to continue breast-feeding the Infant in addition to the other necessary feedings.

10. On March 4, 2022, the Infant's medical condition had improved to where the Infant could be cared for at home and the Infant was released to the parents with discharge instructions and verbal commitments by the parents they would comply with the instructions and call if they had questions or needed any further assistance.
11. The parents did not follow the discharge instructions for care for the Infant. Nor would the parents allow the home health nurse to come to their home to check on the Infant on March 5, 2022 or March 6, 2022.
12. Finally, on March 7, 2022, the parents took the Infant to NP Dkystra (who was not a St. Luke's medical provider but who St. Luke's had connected the family with as he would be able to assist with the NG tube and NP Kravchuk indicated she was not able to provide that level of care for the Infant). At this appointment, the Infant's weight had dropped since it was released from the hospital. NP Dkystra advised the parents how to increase caloric intake and set another appointment for March 11, 2022 to check the Infant's weight.
13. On March 11, 2022, the parents missed bringing the Infant to the scheduled appointment.

14. On March 11, 2022, NP Aaron Dkystra (not any doctor, NP or staff member of St. Luke's) called Department of Health and Welfare Child Protection Services (CPS) regarding his concern about the Infant and requesting a check on the child to make sure the weight of the Infant was not continuing to drop and thus endangering the Infant's life. NP Dkystra had a statutory duty to report his concerns regarding medical neglect by the Infant's parents.
15. A Department of Health and Welfare (DHW) Safety Assessor was assigned to the case. She also made contact with NP Jungman and law enforcement who regularly assist with investigation and welfare checks on children.
16. Going into a weekend, the need to have the Infant's status checked became a greater concern for the Infant's well-being. The DHW Safety Assessor came to Ms. Jungman's office to discuss the referral regarding the Infant. NP Jungman reviewed limited medical records. The DHW Safety Assessor could not reach the Infant's parents. NP Jungman said she would stay at work to see the Infant if parents would bring the Infant in.
17. NP Jungman has been a nurse or nurse practitioner for over 24 years. She is highly skilled based on her studies and work experience. She specializes her practice in providing clinical care and evaluation of children. She has also been trained in and has extensive experience in CPS process.
18. On March 12, 2022, the parents called and indicated they would take the child to St. Luke's Children at Risk Evaluation Services (commonly referred to by its acronym CARES unit) for a weigh-in and wellness check at 4:00 p.m. The parents never arrived for the appointment.

19. Detective Fuller of the Meridian Police Department consulted with Nurse Practitioner Jungman at CARES about what to look for when they were able to put eyes on the Infant to determine if the Infant was or was not doing well. Detective Fuller is experienced at CPS investigations and is trained in the legal standard necessary to remove a child from his or her parents' care.
20. Law enforcement attempted contact with the parents to check on the Infant at the home address provided. Defendant Rodriguez answered the door and would not let law enforcement check on the child.
21. Later that evening, law enforcement was able to track parents down in a vehicle and initiated a traffic stop to investigate the CPS referral and check on the Infant's welfare.
22. Defendants had communicated with their followers and had a large number of persons arrive at the gas station where the traffic stop occurred.
23. With the Infant being held by its mother, Detective Fuller did a welfare check on the child. The NG tube was no longer in place. The Infant presented with symptoms and observations indicating it was not doing well and was in imminent danger. The Infant and his mother were taken to the ambulance.
24. In the ambulance, the Infant was removed from the mother due to Detective Fuller's determination the Infant was in imminent danger. Detective Fuller completed the paperwork to take the Infant into the custody of DHW and to get the Infant transported to the nearest ER.
25. The Emergency Medical Technicians at the scene determined the Infant was "medically stable to transport." "Medically stable to transport" status is not the same as a patient

being medically stable and healthy and in no need of further medical care. It is simply a determination it is safe to transport the patient in the ambulance to the hospital.

26. The Infant was transported to the closest hospital, St. Luke's Meridian hospital, by ambulance.

27. At the ER, Dr. Rachel Thomas examined the Infant. She is a Board-Certified Emergency Room doctor who also has extensive medical experience and training involving children, including treatment of malnutrition and dehydration. Dr. Thomas also determined the Infant was in imminent danger/harm and needed a higher level of care that could be provided at the St. Luke's Children's Hospital at the main St. Luke's hospital in Boise.

28. Even after a bottle feeding in the ER in which the Infant gulped down 6 ounces of formula, Dr. Thomas noted the Infant's weight was less than the weight when the Infant left the St. Luke's Children's Hospital on March 4, 2022. Dr. Thomas diagnosed the Infant with severe malnutrition and dehydration that could lead to death if not immediately addressed.

29. Dr. Thomas testified that the defamatory statements and postings about her by the Defendants have led to emotional stress such that she is taking a break from medicine and leaving the community with her family for an extended period of time. It is her hope she will be able to return and actively continue her medical career.

30. Defendant Bundy arrived at St. Luke's Meridian and with others blocked the ambulance bay from other ambulances being able to come to the hospital. Bundy was demanding release of the Infant even though he was not a family member or guardian of the Infant.

31. The protesters grew in number. The Meridian Police were called. The access doors to the ambulance bay were locked. Bundy was eventually trespassed from the private property of St. Luke's and was arrested along with another person engaged in the protests in the ambulance bay.
32. With active protesting occurring at the ER, Dr. Thomas consulted with hospital security and the Meridian Police Department and had the Infant safely transported to the Children's Hospital after determining the Infant was medically stable to be transported.
33. Dr. Thomas called Dr. Erickson and asked to have the Infant admitted. Dr. Erickson agreed to the admission and immediately went to the hospital to assist with the admission of the Infant to St. Luke's Children's Hospital and to begin further treatment.
34. Even though the Infant was in the custody of the DHW, St. Luke's medical professionals informed the parents of the care plan and the parents consented to all treatment provided by Dr. Erickson as well as by the other Pediatric Hospitalists caring for the Infant.
35. Dr. Erickson confirmed the Infant had in fact lost significant weight<sup>2</sup> since its release on March 5, 2022. Another NG tube was placed, and feedings and hydration began on the Infant.
36. Other Pediatric Hospitalists also provided care for the Infant when Dr. Erickson was not on duty.

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<sup>2</sup> It is important to note that while the amounts of weight loss or gain in this case may not "sound" significant, for the age and size of the Infant in this case and where the Infant was measured at being on the growth chart (in lower than 0.5% of all infants this age), the weight loss was significant and could lead to organ failure and death.

37. NP Jungman also consulted with the Pediatric Hospitalists and participated in the phone and in-person communications with the parents during the time the Infant was at the Children's Hospital. She also stayed involved in the care when the Infant was released to DHW's caregiver.
38. The parents were regularly updated by St. Luke's employees about the Infant's status and were allowed to visit and hold the Infant for approximately two hours at the hospital on or about March 13, 2022. Other visits and communications also occurred while the Infant was at the Children's Hospital.
39. While the Infant was being treated at the Children's Hospital, the Defendants Bundy and Rodriguez, in conjunction with multiple communications sent out by the other Defendants, organized protestors at St. Luke's Boise Hospital. The protests involved hundreds of people including people armed with weapons. Defendant Rodriguez made statements on March 14, 2022 that the Infant was being abused and mistreated by St. Luke's.
40. On March 12, 2022, the Defendants and followers of the Defendants were instructed by Bundy, Rodriguez and the websites or communications from People's Rights Network (PRN) and Freedom Man Press LLC to disrupt the operations of the St. Luke's by jamming the phone lines complaining and demanding the release of the Infant.
41. Bundy and Rodriguez would not leave the private property of St. Luke's when asked. Boise Police and Idaho State Troopers were brought in to maintain the security of the hospital.

42. Eventually, the threat of risk of harm to patients, patients' families, employees and a breach of the hospital became too great and the hospital was forced into lockdown and to close the hospital to new patients.
43. Armed protesters and followers of the Defendants attempted to enter the hospital even after it was locked down.
44. After it was discovered that the Infant had been removed from the hospital, the protesters moved their demonstrations to DHW offices.
45. The Infant was doing better and was discharged from St. Luke's on March 15, 2022 to DHW custody. The parents were allowed more and more time with the Infant by DHW as part of the safety/reunification plan.
46. Through intensive medical efforts, the Infant began gaining weight and his risk of imminent harm was eliminated. The Infant required ongoing monitoring to make sure it was continuing to gain weight and thrive. Additional calories were being given via the NG tube by the Infant's caregivers.
47. DHW stayed in regular communication with CARES and the parents regarding care of the Infant. NP Jungman along with the Medical Director of CARES evaluated the Infant 3-4 times and the Infant was gaining weight.
48. On March 18, 2022, the parents called DHW as the feeding tube had inadvertently come out while the parents had care of the Infant as part of DHW's safety/reunification plan. The parents did not want to go to hospital or have the Infant seen at their home. The parents requested NP Jungman reinstall the NG tube. DHW arranged a place and time to meet the parents away from protesters who were at the main DHW office. NP

Jungman reinstalled the NG tube in the Infant, following applicable standards of care for such a procedure.

49. NP Jungman and the CARES Medical Director evaluated the Infant again on March 23, 2022 with the parents present. The follow-up weight check showed the Infant was continuing to progress. The Infant was more interactive than at previous visits. Home health and PCP care was discussed again with parents.

50. Dr. Michael Whelan, a Board-Certified Pediatrician who works at St. Alphonsus, testified he concurred in the diagnosis and all of the care provided to the Infant. He confirmed based on the medical records that the Infant was in imminent danger based on its dehydration and malnutrition and the Infant was failing to thrive. He further opined that all care provided met the standard of care and there was no medical malpractice or misdiagnoses by any medical practitioner and specifically not by either of the named plaintiffs, Dr. Erickson and NP Jungman. He opined the NG tube was necessary and appropriate both times at the hospital. He opined the discharge instructions from St. Luke's were appropriate. He opined the re-installation of the NG tube by NP Jungman was within the standard of care and did not cause any infection or disease to the Infant as the placement of the tube was into a non-sterilized location of the body, the stomach. He opined the re-installation of the HG tube did not cause an infection in the Infant.

51. Dr. Whelan also opined the parents of the Infant were "medically neglectful" for not following through on discharge instructions and with follow up visits for weight checks to make sure feedings were providing the Infant with sufficient caloric intake. Dr.

Whelan opined he believed the parents knew the Infant had lost weight after first time Infant was released from hospital on March 4, 2022.

52. Dr. Whelan opined that, based on all the outside pressure by Defendants, St. Luke's, Dr. Erickson and NP Jungman performed very well and there was no evidence that the Infant was not improving while in the care of St. Luke's.

53. Based on the testimony of Kyle Bringhurst, the Ada County Deputy Prosecutor who handled the Infant's case and has 8-9 years of experience involving CPS cases, the CPS proceedings and requisite findings for placement into DHW custody occurred as required by statute. A shelter hearing was held on March 15, 2022 and a mandatory adjudicative hearing was set. A Notice of Dismissal by the State was filed on or about May 4, 2022, so the adjudicatory hearing set for May was vacated. The Infant was returned to the custody of the parents with a safety plan.

54. David Jeppesen, Director of the Department of Health and Welfare, also testified the CPS process is defined by statute and was followed in this case. The courts, not the DHW, decide if a child is allowed to return to his or her parents. The goal is to reunite children with their parents and this goal in Idaho is achieved in about 65% of the CPS cases (which is much higher than the national average).

55. Director Jeppesen also testified the DHW does not get "extra money" for placing a child in the care of DHW per the CPS statute. The legislature sets the budget for the DHW and there is no increase in monies to the DHW for children taken into temporary custody under the CPS. Director Jeppesen also testified that allegations of child trafficking or kidnapping are untrue. While there are some adoptions of children whose parents are not fit to raise them, this is in accordance with Idaho's statutes and court

approval is required for all such adoptions. Finally, such adoptions do not happen frequently and there is no preference for persons of a particular sexual orientation as alleged by Defendants.

56. Immediately after the CPS referral was made and the Infant was removed from the parents, the Defendants Bundy and Rodriguez, through their own statements, video postings, communications with their followers and their internet postings on the websites of the other Defendants: Peoples Rights Network (PRN), Freedom Man Press, LLC and Ammon Bundy for Governor -- which Bundy and/or Rodriguez controlled-- began doxxing<sup>3</sup> and intimidating the Plaintiffs, other medical providers as well as anyone involved in the CPS matter (including but not limited to law enforcement, the prosecuting attorney, the judge handling the confidential CPS court proceedings, and the Safety Assessor for DHW).
57. Defendants' statements were intended to damage the reputations of the Plaintiffs; invade the privacy of Mr. Roth, Dr. Erickson, and NP Jungman; to shut down St. Luke's Hospital; and to threaten harm to those involved in the CPS case involving the Infant.
58. Defendants Bundy and Rodriguez are actively involved in and are spokespersons for PRN. Defendant Rodriguez controls and authors many of the statements posted on Defendant Freedom Man Press, LLC's website, which published Bundy and Rodriguez's defamatory statements on the internet and on other extremist media outlets. Bundy and Rodriguez hold themselves out to be anti-government activists motivated by certain religious beliefs. Bundy encourages militia-style training for his

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<sup>3</sup> Doxxing includes publicly identifying or publishing private information about a person as a form of punishment or revenge.

followers. He urges his followers to take action outside the law to protect their rights. Defendants Bundy and Rodriguez, PRN and Freedom Man Press, LLC are willing to encourage others to join them in using violence to reach their objectives and to harass public employees such as law enforcement, DHW employees, CPS prosecutors, and judges.

59. Bundy and Rodriguez used the tactic of “public shaming” through false and defamatory narratives to intimidate and defame the Plaintiffs. This included but was not limited to accusing the Plaintiffs to be involved in kidnapping, child trafficking, child abduction, abusing children, and stealing children for money and pedophilia. This intimidation also included releasing private information about Mr. Roth, Dr. Erickson and NP Jungman which put these Plaintiffs and their families at risk of harm as testified to at trial.
60. PRN was a supporter of Ammon Bundy for Governor, and the events in this case were the topic of Bundy at political gatherings, and defamatory statements about Plaintiffs were made by Bundy at his political events and made for the indirect purpose of raising campaign contributions.
61. Spencer Forby, an expert on extremist organizations as well as a highly trained law enforcement officer and instructor on de-escalating situations, crowd control and SWAT techniques, opined that Defendants Bundy, Rodriguez, PRN and Freedom Man Press, LLC, used their defamatory statements and disinformation rhetoric to trigger their followers to a call for action based on false premises, which then led to Defendants Bundy and Rodriguez creating conspiracy theories of heinous criminal allegations by Plaintiffs without any factual basis. In order to maximize the involvement of the

Defendants' followers, there was a strategic coordination of the false and defamatory messages being repeated over websites controlled by Defendants and shared with other extremist media outlets.

62. Defendants' followers then quickly joined the protest at the hospital and the efforts outside Idaho to disrupt the business of St. Luke's by flooding the phone lines. The false and defamatory statements of Bundy and Rodriguez were then used by followers and the Defendants to harass and intimidate the Plaintiffs via verbal, in-person and online threats.

63. Bundy directed his followers to be ready to "fight it out on the street." Bundy and Rodriguez created a false and defamatory conspiracy theory against the Plaintiffs and repeated it over and over again in an effort to have St. Luke's put out of business and the medical providers to lose their jobs. The Plaintiffs testified they believed the statements presented real threats of violence to them personally as well as their families. Plaintiffs testified as to the specific steps they took as a result of the intimidation and defamatory statements to protect themselves and their family members. Plaintiffs also testified to having to daily track the social media of all the Defendants to weigh and prepare for threatened harm.

64. According to Jessica Flynn, an expert on reputational harm, and Beth Toal, St. Luke's Vice President for Communications, Bundy's and Rodriguez's tactics are deliberate and intentional. Their marketing techniques and use of social media have the effect of disseminating knowingly defamatory information and disinformation to radicalize their followers and at the same time get media coverage of their actions and raise monies for their organizations based on their defamatory statements. The Defendants wanted their

messages to go viral as well as deep and wide, and to have lasting effects. The Defendants wanted their social media attack and protests to prevent St. Luke's from providing services to others. The Defendants also created a clear connection in their social media for contributions to support their conduct. The media recognition gained by the Defendants through their disinformation and defamatory statements is intended to raise their individual profiles as well as their organizations' profiles.

65. The extremist and marketing experts testified the Defendants also used the Infant being taken into CPS custody to increase their own visibility on the internet and in the community as well as to raise money for themselves through the organizations they controlled. This conduct continues to the present and it is not expected to stop as it is a source of fundraising for Bundy's and Rodriguez's organizations.
66. Defendants Bundy and Rodriguez organized and promoted the protests at St. Luke's. These protests involved armed individuals, which is consistent with Bundy's involvement in prior protests and his statements/trainings of his followers about the use of force. The experts testified that the militia training promoted and offered by PRN creates a threat and possible risk of physical harm.
67. On the advice of law enforcement, who indicated they could not restrain the number of protesters (estimated to be 400 persons), St. Luke's was forced to lock down the entire downtown campus and to redirect patients to other facilities.
68. The lockdown also prevented families from entering the hospital to see their loved ones, prevented third parties from seeking care or attending a scheduled appointment at the Boise campus, and prevented employees from coming or leaving their shifts.

69. St. Luke's Chief Financial Officer as well as Dennis Reinstien, CPA, testified that economically St. Luke's lost significant revenue from cancelled treatment or appointments. St. Luke's also incurred additional security costs during the protests and had to increase the number of individuals involved in security at all of its facilities to be prepared for future protests organized by the Defendants.
70. The Defendants knew or reasonably should have known the statements they were making were false and defamatory. Defendant Rodriguez is the grandfather of the Infant and the medical records provided to his daughter (mother of the Infant) easily could have been reviewed by him. Instead, he made false and defamatory statements regarding the health of the Infant, the actual medical care diagnoses and the care provided.
71. Rodriguez also claimed without any legal statutory support that the actions of the CPS were unlawful and was involved with a marketing plan for donations for the Infant and its family, as well as to monetize his and Bundy's organizations.
72. No evidence was presented that any of the Defendants have medical training, knowledge or education to support their false and defamatory statements regarding the Infant's health status and the need for medical care.
73. The intentional, materially false and malicious defamatory statements by the Defendants include, but are not limited to, the following:
- a. The Infant was perfectly healthy when taken by CPS.
  - b. St. Luke's made the Infant sick and infected the Infant with disease.
  - c. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.

- d. St. Luke's, St. Luke's management, law enforcement, DHW, the courts, and the medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- e. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- f. DHW makes more money for every child it takes into CPS custody and that is why the DHW kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- g. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- h. St. Luke's reported the parents to CPS.
- i. Dr. Erickson threatened to file a report with CPS if the parents did not agree to the treatment plan between March 1-4, 2022.
- j. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
- k. The family was discriminated against because the Infant was unvaccinated.
- l. The parents have thousands of dollars of medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
- m. The parents did not consent to the medical treatment provided to the Infant.

n. The Infant was released from the Children's Hospital and returned to directly to the family due to *the protesters'* or Defendants', actions.<sup>4</sup>

74. These false statements were repeated again and again by Defendants, including using links to the statements on other websites and video recordings. "Wanted" posters were made for Mr. Roth, Dr. Erickson and NP Jungman (as well as others involved who were doxxed) and posted on the internet as well as distributed at the protests at the St. Luke's Boise campus. The Plaintiffs and others involved in the events were repeatedly threatened by Defendants' actions of encouraging their followers to take action into their own hands and disclosing personal information about Mr. Roth, Dr. Erickson and NP Jungman. Phone messages to St. Luke's from followers across the county repeated the false and defamatory statements of Bundy and Rodriguez.

75. St. Luke's senior management officers testified it is now more difficult to recruit doctors and other medical providers to Idaho due to the events surrounding the Infant and the Defendants' harassment and defamatory statements towards St. Luke's and its employees.

76. The defamatory statements by the Defendants were completely unfounded, false, made intentionally, and maliciously harmed the reputations of the Plaintiffs and others who were doxxed. These false statements invaded the privacy of Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman by portraying them in a false light as persons who harm children. The defamatory statements and conduct of the Defendants intentionally inflicted emotional distress on Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman as

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<sup>4</sup> The Infant was returned to its parents by the Court through the dismissal of the CPS case, not the actions of Defendants.

well as other parties who were doxxed and threatened. Mr. Roth, Dr. Erickson and NP Jungman all presented substantial and credible evidence of the actual harm they (and their families) suffered due to Defendants' defamatory statements, invasion of privacy and intentional infliction of emotional distress upon Plaintiffs by attacking their professional reputations.

77. Experts Devin Burghart, Spencer Fomby, and Jessica Flynn all testified that once on the internet, it is difficult to remove defamatory statements from the internet. In this case, the Defendants took steps to regularly re-post prior videos and postings and to create links to the false statements on the website of other media sources, thereby knowingly increasing the viewers of the published defamatory statements. The original posts as well as present statements continue on the Internet such as when Bundy or Rodriguez are quoted with links to other websites about this litigation. See Idaho Dispatch quotes and postings in the Declaration of Jennifer Jensen in support of the requested injunctive relief.
78. The extremist organization experts testified the defamatory statements are re-posted by the Defendants in order to keep them in the news and to generate new followers and more donations.
79. C.P. "Abby" Abbodandolo, Senior Director of Security for St. Luke's, who has extensive hospital security and law enforcement experience, testified he was shocked how quickly the Defendants could mobilize their followers to protest, make signs, and come armed and ready to take action. He also testified the Defendants and their followers create an ongoing threat to St. Luke's operations throughout the state.

80. The DHW Safety Assessor left DHW employment and moved out of state due to the doxxing. Dr. Thomas testified she is leaving and moving from the state for a period of time in hopes that she can safely return to practice medicine. Employees left St. Luke's employment due to the protesting and intimidation. Dr. Erickson has considered leaving a job she loves due to the ongoing emotional distress and intimidation of the Defendants. NP Jungman has suffered and continues to suffer from emotional distress, and the intimidation affects how she interacts with parents of other patients.

81. The extremist group experts Burghart, Fomby, and Flynn described both Bundy and Rodriquez as an anti-government activists, conflict disrupters, and disrupter entrepreneurs. Their business model is to raise money for themselves or the organizations they control from followers based on false, fraudulent and defamatory statements. The Defendants have used disinformation (misinformation that is intentionally spread) to harm Plaintiffs.

82. Dr. Camille LaCroix, Forensic Psychiatrist, testified as to the continuing emotional distress to Dr. Erickson and NP Jungman, and that this is not likely to go away and gets worse every time there is a new or a re-posting of a defamatory statement, an article or threat against them personally. Dr. Erickson's husband testified as to the need to continually monitor social media postings to make sure his wife and family are safe. According to Dr. LaCroix, Dr. Erickson and NP Jungman can be triggered and suffer more emotional distress by the re-posting of defamatory statements and invasions of their privacy that cause them to change how they treat others and how they protect their families.

83. Dr. Erickson and NP Jungman each testified that defamatory statements, harassment and intimidation as a result of Defendants' actions affects their life every day professional and in their personal relationships. Both testified as to the constant fear they have due to Defendants defamatory attacks in the newspapers, on tv, and on the internet.

84. The evidence provided at the jury trial was substantial and competent evidence that established the claims of defamation, invasion of privacy and intentional infliction of emotional distress due to the Defendants' conduct. These claims were satisfied by the applicable burden of proofs of preponderance and clear and convincing evidence.

85. As to the defamation claims, the Court finds:

- a. The Defendants communicated information concerning the Plaintiffs to others;
- b. The information impugned the honesty, integrity, virtue or reputation of the Plaintiffs or exposed the Plaintiffs to public hatred, contempt or ridicule;
- c. The information was false;
- d. The Defendants knew it was false or reasonably should have known that it was false; and
- e. Plaintiffs suffered injury caused to the defamation.

86. As to the Invasion of Privacy claims, the Court finds:

- a. The Defendants placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye by publicly disclosing some falsity or fiction concerning Mr. Roth, Dr. Erickson, and NP Jungman.
- b. A disclosure of some falsity or fiction means that a publication or publications by

Defendants were materially false.

- c. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman suffered injury caused by the false light invasion of their privacy.

87. As to the Intentional Infliction of Emotional Distress claims, the Court finds:

- a. Defendants engaged in intentional or reckless conduct;
- b. That was extreme and outrageous;
- c. Causing severe emotional distress to Mr. Roth, Dr. Erickson, and NP Jungman;  
and
- d. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman were injured and the emotional distress was proximately caused by Defendants' conduct.

88. The Defendants' defamatory statements including allegations of conspiracy by the Plaintiffs, law enforcement, the courts and DHW to engage in criminal conduct against children is not supported by any evidence.

89. The false and defamatory statements were made as part of a tactical and sustained marketing campaign to defame and smear the reputations of the Plaintiffs, incite unlawful conduct by Defendants' followers, create a fear of future physical harm to Plaintiffs, and to create an incentive for followers to make donations to Defendants or organizations they controlled.

90. The Defendants actions in this case, as well as the fact that they refuse to stop making defamatory statements, repeat past defamatory statements, presents a continuing threat of actual irreparable harm to Plaintiffs. The continuing threat has led to St. Luke's increasing its security at each of its hospitals. The named Plaintiffs continue to be the subject of threats by Defendants or their followers. The threats include but are not

limited to personal, professional or family member harm through Defendants internet presence and re-posting of prior defamatory statements. A prior Protection Order by the Court has failed to deter Defendants from making knowingly false and defamatory statements and repeating such statements.

### **Conclusions of Law**

The Court requested supplemental legal support for Plaintiffs position they are entitled to equitable relief in the form a permanent injunction. Plaintiffs file a memorandum and supplemental brief and declaration in support of the request injunctive relief. In the Declaration of Jennifer M. Jensen, she indicates the Idaho Dispatch (which is not a party to this lawsuit) continues to post Defendant Rodriguez's and Bundy's defamatory statements about the Plaintiffs and counsel involved in this case on the internet even after the jury trial on damages has ended. Defendant Rodriguez filed an "Answer to Request for Permanent Injunctive Relief."<sup>5</sup> The Court has considered the findings of fact and the entire court record including Rodriguez's filings in making its ruling on injunctive relief.

#### **1. Whether or not to grant permanent injunctive relief is within the discretion of the trial court.**

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<sup>5</sup> Defendant Rodriguez claims in part there has never been an evidence-based trial as to whether or not the things he said were true and he believes all his statements were true. The Court notes the jury trial was evidence-based (with testimony and admitted exhibits), but Defendant Rodriguez elected not to attend and cross examine witnesses or challenge the admissibility of evidence. Defendant Rodriguez also claims injunctive relief is a violation of his First Amendment rights. For the reasons discussed in this Findings of Fact and Conclusions of Law, the Court finds injunctive relief is allowed as a matter of law and appropriate in this case.

In *Gem State Roofing, Incorporated v. United Components, Incorporated*, 168 Idaho 820, 828, 488 P.3d 488, 496 (2021), the Idaho Supreme Court held “The granting or refusal of an injunction is a matter resting largely in the trial court’s discretion.” (citing *Higginson v. Westergard*, 100 Idaho 687, 689, 604 P.2d 51, 53 (1979)). In applying its discretion, this Court must: (1) correctly perceive the issue as one of discretion; (2) act within the outer boundaries of its discretion; (3) act consistently with the legal standards applicable to the specific choices available to it; and (4) reach its decision by the exercise of reason. *Lunneborg v. My Fun Life*, 163 Idaho 856, 863, 421 P.3d 187, 194 (2018). The Supreme Court in *Gem State Roofing* went on to discuss the different standards for preliminary versus permanent injunctions:

As an initial observation, UCI's reliance on the standard for a *preliminary* injunction is inapposite. Rule 65(e) enumerates five grounds for entry of a preliminary injunction. A preliminary injunction is a temporary injunction effective for the pendency of the litigation before the merits of the case are decided. I.R.C.P. 65(e). Preliminary injunctions are designed to protect clearly established rights from imminent or continuous violation during litigation. See *Gordon v. U.S. Bank Nat'l Ass'n*, 166 Idaho 105, 455 P.3d 374, 384 (2019) (quoting *Brady v. City of Homedale*, 130 Idaho 569, 572, 944 P.2d 704, 707 (1997)) (“A district court should grant a preliminary injunction ‘only in extreme cases where the right is very clear and it appears that irreparable injury will flow from its refusal.’”). A permanent injunction, on the other hand, is entered at the resolution of the case, and requires a showing of threatened or actual irreparable injury; in addition, in order to deny a permanent injunction the trial court must be persuaded that there is “no reasonable expectation that the wrong will be repeated.” *O'Boskey*, 112 Idaho at 1007, 739 P.2d at 306. In other words, a trial court may appropriately deny a preliminary injunction at the outset of a case when there are complex issues of fact and law yet to resolve, but correctly grant a permanent injunction once those issues have been resolved in favor of the plaintiff.

*Gem State Roofing*, 168 Idaho 820, 834–35, 488 P.3d 488, 502–03 (2021).

In this case, the Court finds based on the Findings of Fact and the Declaration of Jennifer Jensen, the Plaintiffs have established by substantial and competent evidence of threatened or

actual irreparable damage as well as a reasonable expectation that the wrong will be repeated by the Defendants if permanent injunctive relief is not granted. The jury's monetary damages, if able to be collected, are inadequate to protect Plaintiffs from continued and ongoing injuries to their reputations, privacy, emotional health, ability to practice their chosen professions and reside in the community without fear, and to allow the community to trust that St. Luke's hospital system is not in any way engaged in heinous criminal conduct towards its patients. Balancing the hardships between Plaintiffs and Defendants' alleged chilling of their freedom of speech rights, the balance tips in favor of Plaintiffs. A remedy in equity is warranted as defamatory speech is not protected free speech. Finally, the public interest would not be disserved by a permanent injunction of the scope outlined in this decision. The permanent injunctive relief is appropriate to eliminate the ongoing irreparable threatened and actual harm to all Plaintiffs.

**2. Defendants' defamatory statements are not protected speech under the First Amendment.**

The United States is a republic founded on the doctrine of the rule of law. What that means is all persons are expected to follow the laws adopted through our representational form of government. It also means all persons, no matter their status, wealth or beliefs must follow the rule of law.

The First Amendment to the United States Constitution provides:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press or the right of the people to peacefully assemble, and to petition the Government for a redress of grievances.

However, these rights are not absolute. Every right under the Constitution is subject to limits, and a person or entity cannot make or publish knowingly false statements that intentionally cause reputational or other damage to another and then hide behind the First Amendment as a shield. The

United States Supreme Court has recognized categories of speech that the government can regulate because of the content of the speech, as long as the government does so evenhandedly. *See R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992) (categories of speech that are limited: obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, and child pornography). In *R.A.V.* the Court stated:

The First Amendment generally prevents government from proscribing speech, *see, e.g., Cantwell v. Connecticut*, 310 U.S. 296, 309–311, 60 S.Ct. 900, 905–906, 84 L.Ed. 1213 (1940), or even expressive conduct, *see, e.g., Texas v. Johnson*, 491 U.S. 397, 406, 109 S.Ct. 2533, 2540, 105 L.Ed.2d 342 (1989), because of disapproval of the ideas expressed. Content-based regulations are presumptively invalid. *Simon & Schuster, Inc. v. Members of N.Y. State Crime Victims Bd.*, 502 U.S. 105, 115, 112 S.Ct. 501, 508, 116 L.Ed.2d 476 (1991) *id.*, at 124, 112 S.Ct., at 512–513 (KENNEDY, J., concurring in judgment); *Consolidated Edison Co. of N.Y. v. Public Serv. Comm'n of N.Y.*, 447 U.S. 530, 536, 100 S.Ct. 2326, 2332–2333, 65 L.Ed.2d 319 (1980); *Police Dept. of Chicago v. Mosley*, 408 U.S. 92, 95, 92 S.Ct. 2286, 2289–2290, 33 L.Ed.2d 212 (1972). From 1791 to the present, however, our society, like other free but civilized societies, has permitted restrictions upon the content of speech in a few limited areas, which are “of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality.” *Chaplinsky, supra*, 315 U.S., at 572, 62 S.Ct. at 762. We have recognized that “the freedom of speech” referred to by the First Amendment does not include a freedom to disregard these traditional limitations. *See, e.g., Roth v. United States*, 354 U.S. 476, 77 S.Ct. 1304, 1 L.Ed.2d 1498 (1957) (obscenity); *Beauharnais v. Illinois*, 343 U.S. 250, 72 S.Ct. 725, 96 L.Ed. 919 (1952) (defamation); *Chaplinsky v. New Hampshire, supra* (“ ‘fighting’ words”); *see generally Simon & Schuster, supra*, 502 U.S., at 124, 112 S.Ct., at 513–514 (KENNEDY, J., concurring in judgment). Our decisions since the 1960's have narrowed the scope of the traditional categorical exceptions for defamation, *see New York Times Co. v. Sullivan*, 376 U.S. 254, 84 S.Ct. 710, 11 L.Ed.2d 686 (1964); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974); *see generally Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 13–17, 110 S.Ct. 2695, 2702–2705, 111 L.Ed.2d 1 (1990), and for obscenity, *see Miller v. California*, 413 U.S. 15, 93 S.Ct. 2607, 37 L.Ed.2d 419 (1973), but a limited categorical approach has remained an important part of our First Amendment jurisprudence.

We have sometimes said that these categories of expression are “not within the area of constitutionally protected speech,” *Roth, supra*, 354 U.S., at 483, 77 S.Ct., at 1308; *Beauharnais, supra*, 343 U.S., at 266, 72 S.Ct., at 735; *Chaplinsky, supra*, 315 U.S., at 571–572, 62 S.Ct., at 768–769; or that the “protection of the First Amendment does not extend” to them, *Bose Corp. v. Consumers Union of United*

*States, Inc.*, 466 U.S. 485, 504, 104 S.Ct. 1949, 1961, 80 L.Ed.2d 502 (1984); *Sable Communications of Cal., Inc. v. FCC*, 492 U.S. 115, 124, 109 S.Ct. 2829, 2835, 106 L.Ed.2d 93 (1989).

*R.A.V. v. City of St. Paul*, 505 U.S. 377, 382–83 (1992).

Stated another way, defamation is a limit on both freedom of speech and freedom of the press. A person or entity cannot say “I believed what I was saying was true” when the undisputed facts establish those “truths” were known to be false or should have been known to be false by the Defendants and they were spoken with the specific intent to threaten or cause harm to the other person or entity.

The defamatory statements made by Defendants here were not just disagreements with the manner in which the CPS laws are enforced. Instead, the defamatory statements by Defendants were made intentionally to get others to believe “as true” that Plaintiffs and anyone else involved in the CPS investigation and court proceedings or medical treatment of the Infant were committing heinous acts against the Infant, and that St. Luke’s and the other Plaintiffs were “wicked” and “evil” persons such that they should be removed from their professions and the hospital shut down from providing all medical care to anyone in our community. There is no evidence (only baseless allegations by Defendants) of any such conduct by the Plaintiffs or any other party involved in the CPS case involving the Infant. In a court of law, the party claiming truth as a defense must present evidence of truth, and Defendants did not do so.

Here, the Defendants’ statements in every possible form were intentional and with reckless disregard for the truth, fraudulent, malicious and defamatory. As the jury instructions explained, defamation is the injury to one's reputation either by written expression, which is libel, or by oral expression, which is slander. The law is well-established that speech which is defamatory and causes harm is not protected by the First Amendment. As indicated in the above quote from the

Supreme Court, defamation in our common law existed prior to the founding of this country and has been recognized since 1791 by our courts. Further, the mere fact that religious beliefs are cited as motivation for the Defendants' actions does prevent the statements from being defamatory or illegal invasions of another's right to privacy.<sup>6</sup> Nor does the cloak of the Defendants' religious beliefs that the Plaintiffs were "wicked" allow First Amendment protection to the statements such that the statements cannot also be defamatory.

Additionally, the United States Supreme Court recently reaffirmed fraudulent statements made to encourage or induce illegal immigration for financial gain are not protected speech under the First Amendment. *See United States v. Hansen*, 2023 WL 4138994, \_\_\_ U. S. \_\_\_, 143 S.Ct. 1932 (2023). "Speech intended to bring about a particular unlawful act has no social value; therefore, it is unprotected." *Williams*, 553 U.S. at 298, 128 S.Ct. 1830." *Id.* at 1947 (2023). Defendants' conduct in this case included false, fraudulent and defamatory statements made in part for their own financial gain and such speech is not protected. People are free to give money to whatever organizations or persons they want, but they should be informed if the statements to support such donations of monies are not true.

Finally, simply saying a statement over and over does *not* make it true. It is well-established law that a person can tell certain lies and those lies are protected by the First Amendment. *See United States v. Alvarez*, 567 U.S. 709 (2012) where an individual was being criminally prosecuted for falsely claiming to have received a military medal of honor pursuant to the Stolen Valor Act was a content-based restriction on free speech. The difference here is that Defendants' statements were not lies about themselves; they were false, intentional and defamatory statements about others which were intended to hurt Plaintiffs' reputations or businesses. No reasonable person would

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<sup>6</sup> Indeed, the Court cannot to find any religious support for bearing false witness against another.

think these statements were meant for any other purpose than to harm the reputations and to threaten the persons being attacked by such statements. Such statements are not protected speech under the First Amendment.

Listening to and watching the videos of the Defendants and the published written statements of the Defendants Bundy and Rodriguez that claim their belief that “they” had the individual “right” to take the Infant (who is not even their child) back by violence if necessary is a profound misstatement and misunderstanding of the rule of law. In reality, it is a cry for “vigilante justice” which is the act of enforcing the law without legal authority to do so. Vigilante justice does not involve due process and allows one person to be the lawmaker, the law enforcer, the judge and jury without any investigation into the truth. Vigilante justice is not a “right” an individual or group of individuals have in this country.

Laws are passed by duly elected persons through a legislative process involving two representational governmental bodies and then also approved by the executive officer (the President of the United States or the Governor of a state). Laws are enforced by law enforcement officers in the executive branch of government. Challenges to the laws as being facially unconstitutional or unconstitutional as applied are for the judicial branch to decide.

Vigilante justice is not tolerated under the Constitution because it violates the rights of the accused. Vigilante justice expounded by the Defendants is meant to control others not by the rule of law, but by intimidation through threats of violence and the public shaming of others. Defendants clearly believe they are above the law and can operate outside the boundaries of our laws if they disagree with how the laws are being applied. That is not how our government works. A party can appeal a court’s ruling and seek appellate review of a decision. The manner in which

to challenge any court's ruling is not through threat and intimidation. It is through the judicial process.

Moreover, if Defendants want the CPS statutes to be revised or changed, then they can lobby the legislature. While it is unclear exactly what changes to the law the Defendants seek, they are free to propose changes by working directly with legislators to sponsors bills. The Idaho Legislature has a long history of protecting children through the DHW, and nothing in this trial established the procedure approved by the Legislature was not followed or was misapplied based on the true health status of the Infant and the failure of the parents to allow the Infant to be seen for follow-up care. In fact, this case is an example of the CPS system working exactly as intended by the Legislature to protect the well-being of a child.

In several of the published statements by Defendants Bundy and Rodriguez they encouraged their followers to "follow the money" to prove how children are being harmed, trafficked, or kidnapped by CPS. No actual evidence was cited for this proposition by the Defendants and it was proven to be false at trial. Instead, the evidence in this case shows the only money being "made" by the events involving the Infant were St. Luke's and other medical practitioners receiving Medicaid reimbursement for the medical services provided (which was testified to be 70% of the actual cost of the care) and money flowing from donations by Defendants' followers (based on false defamatory statements about the Plaintiffs and others) to Defendants Bundy, Ammon Bundy for Governor, Rodriguez, People's Rights Network, Freedom Man Press LLC and Freedom Man PAC.

If Defendants wanted to present a defense of the "truth" of their statements, they could have participated in this lawsuit or at least the damages trial. They did not. The Court must take the undisputed facts presented at trial as true. Moreover, independent expert medical testimony as

well as common sense establishes the facts were not as Defendants maintained. The actual numerous weights taken of the Infant as well as the results of other medical tests and the pictures of the Infant did not present a healthy infant. Dr. Wheaton testified there was no misdiagnosis or malpractice by the medical providers.

The Court finds St. Luke's did not initiate nor threaten to initiate CPS action. Did St. Luke's become involved after the Infant was taken into the custody of DHW? Yes. However, no child was "kidnapped" by the police or doctors. No child was "trafficked" or abused by DHW, the hospital, the doctors or the courts. Instead, St. Luke's through its staff and medical providers provided the *necessary* medical care the Infant needed (twice) and took care to receive the parents' consent for the care provided even though during the second hospitalization was when the Infant was in the temporary care and custody of DHW. All of the Infant's medical care was covered by Medicaid insurance.

Dr. Whelan testified the need for CPS to get involved was due to the parents' failure to attend follow-up appointments. In making this last statement, the Court does not in any way believe the parents intended to harm the Infant. But the parents did neglect the medically needed follow-up appointments to make sure the Infant was gaining, not losing, weight. New parents have a plan for how they want to care for their child and they are allowed great freedom in implementing their plan, until and unless the child's welfare is at risk. At that point, the DHW has a duty to step in, to get the child the care it needs and then to develop a reunification plan so the child can return to its home and thrive.

### **3. Permanent injunctive relief is appropriate in this case.**

Permanent injunctive relief requiring the Defendants to stop making defamatory statements about the Plaintiffs, to remove defamatory and harassing statements or posts from online locations under the Defendants' control and prohibiting the Defendants from republishing the statements or posts is appropriate in this case. The statements, internet posts, online interviews made as part of a sustained campaign of defamation by Defendants and they continue to threaten or cause actual irreparable harm to the Plaintiffs. Based on the testimony of Mr. Roth, Dr. Erickson, NP Jungman, this conduct not only affects the individual Plaintiffs, but it also affects their families, their co-workers, their work environments. It also continues to negatively impact the reputation of St. Luke's in the community. The Court has no expectation that the defamatory statements will stop by Defendants without a permanent injunction.

This type of conduct can be enjoined by a court. While the Court could not find any on-point Idaho authority for the factual circumstances presented in this case, the Court can look to other jurisdictions for persuasive authority for internet smear campaigns. *See, e.g., Balboa Island Vill. Inn, Inc. v. Lemen*, 40 Cal. 4th 1141, 1155-57 (2007) (holding that the court may issue an injunction prohibiting the defendant from repeating statements judicially determined to be defamatory and rejecting argument that damages are the only remedy for defamation because otherwise the plaintiff would be required to bring a succession of lawsuits for damages which could be insufficient to deter the continuing tortious behavior); *Advanced Training Sys. v. Caswell Equip. Co.*, 352 N.W. 2d 1, 11 (Minn. 1984) (affirming permanent injunctive relief prohibiting republication of material found libelous at trial); *Weitsman v. Levesque*, Case No. 19-CV-461 JLS (AHG), 2020 WL 6825687, (S.D. Cal. Nov. 20, 2020) (applying New York law and collecting New York cases that removal orders are

necessary when parties refuse to depublish); *see also St. James Healthcare v. Cole*, 178 P.3d 696, (Mont. 2008) (affirming in part preliminary injunction against harassing and threatening statements).<sup>7</sup>

In *Weitsman*, the court ordered permanent injunctive relief when the defendant engaged in a “sustained Internet defamation campaign” falsely accusing the plaintiff of child trafficking. *Weitsman*, 2020 WL 6825687. The court entered default against the defendant, and the plaintiff obtained an award of compensatory and punitive damages. *Id.* The defendant had continued making the defamatory statements online, despite the litigation and an arrest warrant. *Id.* A permanent injunction was appropriate due to the intentional, sustained campaign of defamation aimed to injure the plaintiff’s interests, including business interests. *See id.* The injunction was tailored to (1) require the removal of statements held to be defamatory whose postings online were under the defendant’s control; and (2) prohibit the republication of statements held to be defamatory. *See id.*

The Defendants’ actions attacking Plaintiffs in this case were relentless for over a year and with the specific intent to harm the reputations of St. Luke’s and the other named Plaintiffs who did their job to ensure the Infant received necessary medical care. The Defendants continue to the present time in making defamatory statements to others about the Plaintiffs. There is every indication based on the Defendants’ conduct over the prior year that the Defendants will continue to repeat and re-post the defamatory statements if no injunction is entered. The Court recognizes the Defendants have the means to influence thousands of followers, as they quickly organized protestors at the hospitals and across the country to disrupt St. Luke’s business. This ability to mobilize others and to condone violence makes the threatened irreparable harm even more likely.

As several experts testified at trial, that once on the internet, it is difficult to remove defamatory statements from the internet, a simple retraction is inadequate relief for the Plaintiffs. Plaintiffs are entitled by law to have all the Defendants do everything in their power and on all

sites under their control (directly or indirectly) to remove all the judicially determined defamatory statements about the Plaintiffs. Moreover, the Defendants are ordered to stop making new or repeating previously made statements or postings with defamatory statements about the Plaintiffs. Further defamatory statements or invasion of Plaintiffs' privacy regarding the events with the Infant by Defendants could lead to new litigation for defamation. This defamation against the Plaintiffs is not protected by the First Amendment and it must end.

If the defamatory statements are not taken down, they will be repeated and cause more irreparable threatened or actual harm to the Plaintiffs. The Plaintiffs have a right under law to seek injunctive relief from the Court to force the Defendants to stop making and publishing defamatory statements about the Plaintiffs. Plaintiffs followed the rule of law and legal process for having such a remedy ordered by the Court. The Plaintiffs proved the statements were intentional, false and made by Defendants with the specific intent to cause reputational damage to the Plaintiffs and to invade the Plaintiffs' privacy. The Defendants continue to try to raise monies based on the defamatory statements.

#### **4. Scope of injunctive relief.**

The Court, in exercising its discretion, finds a permanent injunction is warranted under the law against the Defendants in this case. The Court exercises its discretion based on the findings of fact and conclusions of law to grant the equitable relief requested. "A permanent injunction requires a showing of threatened or actual irreparable injury." *Hood v. Poorman*, 171 Idaho 176, 519 P.3d 769, 783 (2022) (citing *O'Boskey v. First Fed. Sav. & Loan Ass'n of Boise*, 112 Idaho 1002, 1007, 739 P.2d 301, 306 (1987)). There is a threatened or actual irreparable injury to Plaintiffs if defamatory statements about the care of the Infant and the Plaintiffs are not stopped. The Defendants are aware their statements have been found by a jury and court of law to be

defamatory, so continuing to say the statements are true may expose Defendants to additional legal liability.

Defendants will be ordered to take the following actions to remove all defamatory statements and violations of the privacy of the Plaintiffs. Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

Failure by the Defendants to follow the Order for Permanent Injunctive Relief may lead to contempt proceedings, sanctions and other legal ramifications.

## **Conclusion**

Fortunately for the Infant and our community, the Plaintiffs ignored the actions of the disrupters led by Bundy and Rodriguez and instead made saving the life of the Infant their priority. Plaintiffs St. Luke's and Mr. Roth were not distracted from their mission of providing medical care when needed to any member of our community regardless of a person's ability to pay. St. Luke's followed established medical treatment procedures and DHW followed Court orders, not the demands of the Defendants. Dr. Erickson and NP Jungman followed their oaths to help and not harm their patient. But the disinformation continues by Defendants even after the Infant was returned to its parents by the court through the CPS proceedings, even after the civil lawsuit was filed, and even after the jury verdict was returned.

Defendants' continued disinformation regarding the Plaintiffs does not help our community. The actions and conduct of the Defendants have made our community less safe. Medical providers and other employees are leaving their professions because of the damage to their reputations, the invasion of their privacy, the harassment and threats of intimidation by Defendants. Defendants' conduct and the conduct of their followers selfishly prevented third parties from coming to the St. Luke's hospitals and clinics for care, prevented the family members of other patients from seeing their loved ones at the hospital, disrupted the care of other patients, and threatened the safety of employees due to the sheer noise and intimidation of armed protestors surrounding the Boise hospital. The First Amendment protects and allows citizens to protest, but the First Amendment does not allow armed citizens to attempt to enter the private property of St. Luke's when it was locked down.

The defamatory statements of Defendants against the Plaintiffs have the indirect effect of making it more difficult to attract medical professionals to Idaho. The defamatory statements have

the direct effect of causing highly qualified medical professionals to leave the profession they love due the stress from the intimidation and threats of personal harm by Defendants and their followers. The defamatory statements have the direct effect of making it more difficult for other community members to safely access medical care when needed.

A permanent injunction is warranted and appropriate in this case to stop Defendants from reposting and repeating statements that have been deemed by a jury and the Court to be defamatory and harmful to the reputational interests, privacy interests and emotional health of the Plaintiffs. A retraction by Defendants is insufficient to reverse the continued threat of irreparable harm to the Plaintiffs. Monetary damages, even if they can be collected, are inadequate to protect against further harm to the Plaintiffs or to deter Defendants. In order to avoid the threatened or actual irreparable harm to Plaintiffs reputations, professions, emotional health, the defamatory statements of the Defendants must to be removed from the online sources controlled by Defendants (directly or indirectly) and no longer repeated orally by Defendants.

### **Order**

Based on the Findings of Fact and Conclusions of Law, the injunctive relief requested by the Plaintiffs is appropriate and shall be ordered by the Court in a separate Permanent Injunction Order. Plaintiffs shall submit a proposed Permanent Injunction Order for the Court's review consistent with these Findings of Fact and Conclusions of Law. Plaintiffs are also directed to provide a proposed Default Judgment to be entered consistent with this Order, the jury verdict and previous attorney fees as sanctions ordered by the Court.

IT IS SO ORDERED.

Dated: 8/25/23

  
NANCY A. BASKIN  
District Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/25/23, I caused a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR INJUNCTIVE RELIEF to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following person(s):

Erik F. Stidham (X) Email  
Jennifer M. Jensen  
Zachery J. McCraney  
Alexandra S. Grande  
efstidham@hollandhart.com  
jnjensen@hollandhart.com  
zjmccraney@hollandhart.com  
aehenderson@hollandhart.com  
*Attorney for Plaintiff(s)*

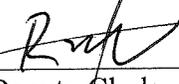
Diego Rodriguez (X) Email  
freedommanpress@protonmail.com  
*Pro Se Defendant*

Ammon Bundy, Ammon Bundy for Governor, (X) Mail  
and People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Lane  
Emmett ID 83617-3601  
*Pro Se Defendant*

Ammon Bundy for Governor (X) Mail  
And People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett ID 83617  
*Pro Se Defendant*

Freedom Man Press LLC and Freedom Man PAC (X) Mail  
c/o Diego Rodriguez  
1317 Edgewater DR #5077  
Orlando, FL 32804  
*Pro Se Defendant*

TRENT TRIPPLE  
Clerk of the District Court

By  Deputy Clerk

# EXHIBIT F

**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

**DEFAULT JUDGMENT**

JUDGMENT IS ENTERED AS FOLLOWS:

1. Judgment is entered in favor of 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, N.P. against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

2. St. Luke's Health System, Ltd.'s and St. Luke's Regional Medical Center, Ltd.'s damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Nineteen Million One Hundred Twenty-Five Thousand Dollars [Fourteen Million One Hundred Twenty-Five Thousand (\$14,125,000)** in compensatory damages and **Five Million Dollars (\$5,000,000)** in punitive damages].

3. Previously Court-ordered and unpaid attorneys' fees and costs of St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. are awarded against:

- a. Defendant Ammon Bundy in the amount of **Thirteen Thousand Four Hundred Forty-Three Dollars and Twenty-One Cents (\$13,443.21)**;
- b. Defendant Ammon Bundy for Governor in the amount of **Six Thousand Eight Hundred Ninety-Five Dollars and Eighty-Six Cents (\$6,895.86)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. Defendant Freedom Man Press LLC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**;
- e. Defendant Freedom Man PAC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**; and
- f. Defendant People's Rights Network in the amount of **Eight Thousand Three Hundred Thirty-One Dollars and Ninety-Six Cents (\$8,331.96)**.

4. Chris Roth's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Eight Million Five Hundred Thousand Dollars (\$8,500,000)** [Two Million One Hundred Twenty-Five Thousand Dollars

**(\$2,125,000)** in compensatory damages and **Six Million Three Hundred Seventy-Five Dollars (\$6,375,000)** in punitive damages].

5. Natasha Erickson's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

6. Tracy Jungman's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

7. Interest shall accrue on all awarded damages bearing the statutory rate of 10.250% per annum until paid in full.

8. Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.

- iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
- iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- viii. St. Luke's reported the parents to Child Protective Services.
- ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
- x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- xi. The family was discriminated against because the Infant was not vaccinated.
  - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xiii. The parents did not consent to the medical treatment provided to the Infant.
  - xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
- c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:
- <https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabyCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

- d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
- e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:

<https://www.peoplesrights.org>, <https://www.votebundy.com>,

<https://www.freedomman.org>, <https://stlukesexposed.com>,

<https://www.facebook.com/SaveBabyCyrus/>,

<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>

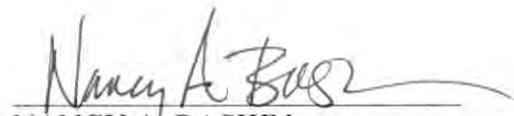
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

- f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

IT IS SO ORDERED.

DATED: 8/29/2023

  
NANCY A. BASKIN  
District Court Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following persons:

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:

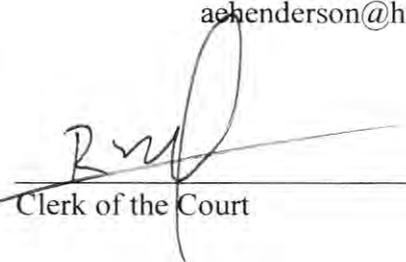
Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

Erik F. Stidham  
Jennifer M. Jensen  
Alexandra S. Grande  
Zachery J. McCraney  
Anne E. Henderson  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714

- U.S. Mail
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[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto:aehenderson@hollandhart.com)

DATED: 8/29/23

  
\_\_\_\_\_  
Clerk of the Court

# EXHIBIT G

---

**From:** Erik Stidham  
**Sent:** Wednesday, September 13, 2023 6:06 PM  
**To:** 'Freedom Man Press' <[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)>  
**Subject:** FW: St. Lukes\_Bundy \_ Cease and Desist Letter to Rodriguez

Mr. Rodriguez,

See attached.

Regards,

**Erik Stidham**  
Partner, Holland & Hart LLP

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

September 13, 2023

Diego Rodriguez  
1317 Edgewater Drive, #5077  
Orlando, FL 32804

**Re: *St. Luke's et al. v. Ammon Bundy et al.*  
Violations of Permanent Injunction**

Dear Mr. Rodriguez:

I write regarding your continued violation of the Court's Findings of Fact, Conclusions of Law and Order for Injunctive Relief, which was issued on August 25, 2023 ("August 25 Order"), and the Court's Default Judgment Order, which was issued on August 29, 2023 ("August 29 Order"). The Court's clerk served you with these Orders on August 25 and August 29, respectfully. The Orders are enclosed.

In its orders, the Court directs you to cease posting and disseminating specific statements, to remove unlawful content from the internet, and to deactivate unlawful links. *See* August 25 Order at 36-39; August 29 Order at 3-6.

Those orders state:

Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.

6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 25 Order at 37.

Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.
  - iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
  - iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
  - v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
  - vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
  - vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
  - viii. St. Luke's reported the parents to Child Protective Services.
  - ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
  - x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
  - xi. The family was discriminated against because the Infant was not vaccinated.
  - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xiii. The parents did not consent to the medical treatment provided to the Infant.

- xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protesters' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
- c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabvCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),  
[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)
- d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
- e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabvCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),  
[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)
- f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 29 Order at 3-6.

The Court warned that your failure to comply “may lead to contempt proceedings, sanctions and other legal ramifications.” August 29 Order at 37. Yet as of the date of this letter, you have refused to comply.

Your unlawful conduct continues to cause daily, irreparable harm to my clients. It also harms our community and makes our communities less safe. *See* August 25 Order. Accordingly, my clients hereby demand that you cease and desist from your unlawful conduct, that you remove the unlawful content from the internet, and that you deactivate the links as mandated in the Court's orders.

A non-exhaustive list of examples of your unlawful content that must be removed and/or deactivated includes:

- All webpages that violate the Permanent Injunction order that begin with the <https://freedomman.org/cyrus/>
- <https://www.freedomman.org/video/government-subsidized-child-trafficking/>
- <https://www.freedomman.org/2022/my-response-to-the-idaho-statesman-st-lukes-lawsuit/>
- <https://www.freedomman.org/2023/judge-lynn-norton-and-erik-stidham-just-gag-ordered-me/>
- <https://www.freedomman.org/2023/facts-about-ammons-contempt-of-court-charge/>
- <https://www.freedomman.org/2023/judge-lynn-norton-just-intentionally-broke-the-law-proving-that-she-is-biased/>
- <https://www.freedomman.org/2023/idaho-department-of-health-and-welfare-is-the-bad-guy/>
- <https://www.freedomman.org/cyrus/archive/baby-cyrus-was-kidnapped-one-year-ago/>
- <https://www.freedomman.org/2023/diego-rodriguez-issues-challenge-to-st-lukes-and-erik-stidham/>
- <https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>
- <https://www.freedomman.org/2022/open-letter-meridian-police-ada-county-sheriff/>
- <https://stlukeseExposed.com/> (all links and webpages from this website that violate the Permanent Injunction Order including, but not limited to, the following webpages and/or links embedded in the webpages: <https://stlukeseExposed.com/truth-about-st-lukes/>, <https://stlukeseExposed.com/lawsuit/>; <https://stlukeseExposed.com/lawsuit/evidence-that-cps-agents-meridian-police-and-st-lukes-were-lying/>; <https://stlukeseExposed.com/lawsuit/diego-answer-4th-amended-complaint/>; <https://stlukeseExposed.com/lawsuit/judge-lynn-norton-violates-the-constitution-again/>; <https://stlukeseExposed.com/lawsuit/judge-lynn-norton-judicial-misconduct/>, <https://stlukeseExposed.com/lawsuit/erik-stidham-criminal-complaints/>; <https://stlukeseExposed.com/lawsuit/summary-video/>)
- <https://www.facebook.com/SaveBabyCyrus/> (all links and webpages from this website that violate the Permanent Injunction Order including, but not limited to, the following webpages and/or links embedded in the webpages: [https://www.facebook.com/SaveBabyCyrus/posts/pfbid034caCEKGT6LgyPudmF6ruqzu6jCBojcmEa5UeY4Waki2thyMi1ytYr72wu7t8Wol](https://www.facebook.com/SaveBabyCyrus/posts/pfbid034caCEKGT6LgyPudmF6ruqzu6jCBojcmEa5UeY4Waki2thyMi1ytYr72wu7t8Wol;); [https://www.facebook.com/SaveBabyCyrus/posts/pfbid0RHvM8TZjJt4rpng6jESxnJRUUnAxMhfeYHncx1VeQ3PMCWVJhAje8yvZpqT59XcoJl](https://www.facebook.com/SaveBabyCyrus/posts/pfbid0RHvM8TZjJt4rpng6jESxnJRUUnAxMhfeYHncx1VeQ3PMCWVJhAje8yvZpqT59XcoJl;);

<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0c26BXVnvBwT3B8JWxVB UkaALb1KYwXTxo7kPN4ErkZiW8pb3qoxL2pogrMXPdGVdl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0g3ULabfJ7WwrcinRsn42Xh RTABRzEaHGpQwKWBGzQ3eRkgdCGZUoM8Wxq9599ZdCl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02Q6u5j9g19dG3P4s2shQBa SimN5XHoYL6vcyPBVi6BgWso8FUm7HRfHGG9iQXsWKjl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0fdzWiatcZBnPLJ1Ptq7ydVp QVDgD1Xt9Vz63yKAQas2BjZxuTYg2oWEEdMd43czXrl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0HzQNcWhj6GfAQ42ArG9L QEEgPQjib25z6RgESVHAHLjR3Zepmm884tCkbB2V8DPZl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0mWHqY6eMMforMTyPAw gccEnpKUp4E63qLutFME8x2PC71JrHE8Eq4XTVJAx65JaSl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0KFvR9PQv3WiTdJ9xzY8T gDPnJywpEG3ZWhF5eezgFNgsESoxnAnovsiUWFq198l;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0r5ztTdRA3ErqnxYepJEYyuj ZDbhAcuPZbeYDwRVXew6dtSnE3EtJN3xFuR8GBbzTl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02ptDHNuF1Np38QbDveA6 z2G5ZrnsviUvBaMGxU2amjb8VSCUWwxKUKWbpdjqPQQAAl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0ZQBMV9TGsG7b67SSP8H DeBBrxhwfyEVvZZJ68yVLijPCgoYoqn2UwuiR5DfLi5t9l;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0XWkVv5D6eFAJWYbM9P qTWF1Aq6B8V34PTSvstELnzLccsoK1iuVwjnzEd7HTYTvsl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02XYAkyvd9EkMnGGLFDs ZSi898JG8FqpWaCnSkVfLenyZJ8wtuQsyELTtc5DJMp5W5l;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0iKqNYEQ9JBbAG2bDoFBn anvPNt6HccL3QWMCtn5SWWNqtGzzwwmY4J9PRyJGsEWTl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0MSNGXbd4wCsn52gjW7X E5Yz3gWYE9pxTTwydVwHvVvj21C86PajF2gycfoZj9A45l;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0vjCgWmLUWXULC9LaQ4 DjID16G75Pz32Kw537sqVEyDLyDeJEH8j2TiifJQm9in5fl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0385C6SciSWJ4LX1X5ShW KTUYtZHAwrVlsjUDV5WHzMgd59WqTmexoX3GEn54cnSjul;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid08bmm8FLoGi7a82Ca7jn9Tk UHjeNoTVu6vNb9Kr73UNKodijuwei1uiu9tMsqskkXl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02Qnm31ZesxfY8G3MiXWq MQmV4YisRj3yJCY76x5UkoxebXAoSNUXlmvSVyxqNj7zDl;>  
<https://www.facebook.com/SaveBabyCyrus/videos/daddy-playing-peek-a-boo-with-baby-cyrus-/459198315981998/;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0naef7pbfTSMHca28esYD8Z wLHWsydEspgmPFAfn1C9Mpuaw2NcvmqFivsTZbYNtnl;>  
<https://www.facebook.com/SaveBabyCyrus/videos/st-lukes-shutdown-entire-hospital-on-march-15th-over-peaceful-families-protestin/1006608316897658/;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid033sDXFrdrvXWGbqUjgmG X6TLpbeQWmesctM7D7EMZxjHnG53mDtNHZQP1wXkTjaQBl;>

<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02ZU7JMfE8pDVorfNygazR7uEyHjXFPNb98bnmvdor6vpSvXGChy9n8qzb6qsUZzvr1;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02j3syT35DHdGnMYwHKw14juow2kr3nvqyhCmyexbJGTMuCd6NA1TgzvNaMx59zmhl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0YvDoVGEyCwKS9T3RAfoRBJZL83KUPHXEEEn5NC2Uf312AtLx7wSs283QXbB26bbN8I;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0G6krH2x11YJ4QjJdPCAcH1ztmPtLyRTvZG2jbeox8GKULxEf8TNTUZy5RCg2Ywc3I;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02EC8Eax1H6YHAW2F8tG6igUwrCj84eNcDyjJrbjuhnUT9hTEkdbCojSLvUXATU2kdI;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid026r6bhuHKZzbXL6qrLsEoWzY41XfPsY6CWW5ZaVxoZH7KaEb55kgF5xt6sszutBa7I;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid05ZwkFWiWdz1FnGoBS1DSVYaGWDkKjFCs2G7EgzxESFvLRa1SCHicMb7mUkTd2Tqol;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0Pm2KXVDBcqTwRCFrRN BqeeQsLkwLWGJUKmMZCwvS3fRgCuNxZEitz8KUBiqZeLpl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02jmnZMcNS7Wtu7RHcoxj mDtPk5ib3YcgwzGDruTVE52hX9zUJ4c1vDxoXC5E25U1Vl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0Jptj8wJoFEqLymb7D3jBC5214G5zaYAx4UUG2Bhf8z8f8cYtZx99nJkYv9s7nDual;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0rX1R83FYdtFEHo3qZNTZOGRVXMya1YghkNi6ZY22QceRDXfdLtnTq3dcJbKHdXEYI;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid029L34F22HAL82jCuFJJHhUfdRb1xcAuGw6R145EEC553rjF485n8oKfyLoHSwv1Jl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02UohsyR12DT6ESYqL8U6QUwayaSgxF8j3eZ79biGCngU2an5zdTQMZDaQGD9R6UCfl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid027R5XK7DFwEf5raSrWzQr ranZoNWEhvYfbXbjpuUTtjJcTDwsudgfA6QQeJ456oPgl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02BgSTN9gnhCCvFX1m3ErX9PnShQpdLh44nnQ2RmdxuVeKLR9ZA4qgpr8ZmyYjAW7kl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0axc4SxNfZGz9VWv8FLWrdxiPc86PSoBo4uKyG833vYkiaXfYrBodmPXTyRBPgerAl;>  
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02reKmJxR9SoNb6A8VNp8jgre6wZ63r8y4L1vnfbaaofVqZ81QHWrNcKiMb1oDxGTRl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02zc4iEqSGbM85RTf17NvSpnuyhvyDdLAhBMmVGNbhBdQ7aVoz7bWz4trwhqh2YBNUI;>

<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02DU5beUvuicrjdUuNdiOgdgRTTt9cV49q4Ei7dvj8cN9A2jciBsGdS25vTRxPpeSQL;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0dQgp34nbKrYjvQJsAY2NpPjzSuESa4oM41uBV36kSHyn81fH1tTzkkMU7sqP4B2HI;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0bEzBsMarpDkh4M7gAYX3a9zBNnYLv1WEJzeQHoETvhnQYnv9PZ1byw2qdXMfBQUxl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02bwQLK1UTM4odPex34Qsdmeu75NP1JuT3dypkQjAVxhjYiFTuNHL2SfWFRRN3oR2l;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02LecjwM2V6cw88DF33WFY7TRWQwTSbhZQFgDN1NgR4qzPmsSWjcLRaZUv1Db8Y7Wl;>  
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0uGTMTVfN6bQMHLgxGoOtCdwITtSC7pDUeSetRqNVphxhiB3MQvwRRy8WqG3zuMKrl;>  
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0SRtCLsRc3eEQasrC1AVPLPAWF7xbrSi7UpCbNxE88aFnzQfXsmqbrbrbs9u688zXol;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0YcXe2sUcmWh12gEC1JJJYR7aFXfNdrKBMF67tqmck48McGn4b1rtQM9i9UVmrRol;>  
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02Ddug6irdGWty8vzbNuBRdEdgAcJHTnDrLLU2KYb6x72piritLcJ14iC8iefbn2xQXl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0RoxFOC7kcSpiQ5rdtKYhCKRQJ8sYeN6EDbp5LNfaeBoRBY3LNNHvCLUSEpd8xfvVl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02H66EnDHWyJSzhxoU93taSFLaFnhL4PfHBMUuovLQhZwT8FWM22fjige7f6XLtkBFl;>  
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02ThbiGSyKGFCdGKHrm8CX7ZT1WR5jnrV7zvW1Grt6YxzEt88CRVyzhb997zvDmgu3l>

- all <https://telegram.org/> posts and/or comments that violate the Permanent Injunction Order.
- <https://www.youtube.com/watch?v=RYZRu648O10>
- <https://www.youtube.com/watch?v=hIXwUj1cLRI>
- <https://www.youtube.com/watch?v=XKVMvmkRoe4>
- <https://www.youtube.com/watch?v=rzw0B8HVG18>
- <https://player.vimeo.com/video/688343093>
- <https://player.vimeo.com/video/689507913>
- <https://player.vimeo.com/video/690083915>

- <https://player.vimeo.com/video/692986648>

Please comply with the Court's Permanent Injunction by September 22, 2023.

If you do not, we will pursue all available legal remedies.

This cease-and-desist letter is sent without waiver of any right or remedy available at law or equity.

Sincerely,

*/s/Erik F. Stidham*

Erik F. Stidham  
Partner  
of Holland & Hart LLP

EFS:cmc  
Enclosures

30419382\_v1

**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

**DEFAULT JUDGMENT**

JUDGMENT IS ENTERED AS FOLLOWS:

1. Judgment is entered in favor of 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, N.P. against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

2. St. Luke's Health System, Ltd.'s and St. Luke's Regional Medical Center, Ltd.'s damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Nineteen Million One Hundred Twenty-Five Thousand Dollars [Fourteen Million One Hundred Twenty-Five Thousand (\$14,125,000)** in compensatory damages and **Five Million Dollars (\$5,000,000)** in punitive damages].

3. Previously Court-ordered and unpaid attorneys' fees and costs of St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. are awarded against:

- a. Defendant Ammon Bundy in the amount of **Thirteen Thousand Four Hundred Forty-Three Dollars and Twenty-One Cents (\$13,443.21)**;
- b. Defendant Ammon Bundy for Governor in the amount of **Six Thousand Eight Hundred Ninety-Five Dollars and Eighty-Six Cents (\$6,895.86)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. Defendant Freedom Man Press LLC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**;
- e. Defendant Freedom Man PAC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**; and
- f. Defendant People's Rights Network in the amount of **Eight Thousand Three Hundred Thirty-One Dollars and Ninety-Six Cents (\$8,331.96)**.

4. Chris Roth's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Eight Million Five Hundred Thousand Dollars (\$8,500,000)** [Two Million One Hundred Twenty-Five Thousand Dollars

**(\$2,125,000)** in compensatory damages and **Six Million Three Hundred Seventy-Five Dollars (\$6,375,000)** in punitive damages].

5. Natasha Erickson's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

6. Tracy Jungman's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

7. Interest shall accrue on all awarded damages bearing the statutory rate of 10.250% per annum until paid in full.

8. Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.

- iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
- iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- viii. St. Luke's reported the parents to Child Protective Services.
- ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
- x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- x. The family was discriminated against because the Infant was not vaccinated.
  - xi. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xii. The parents did not consent to the medical treatment provided to the Infant.
  - xiii. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
  - c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabyCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.

e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:

<https://www.peoplesrights.org>, <https://www.votebundy.com>,

<https://www.freedomman.org>, <https://stlukeseExposed.com>,

<https://www.facebook.com/SaveBabyCyrus/>,

<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>

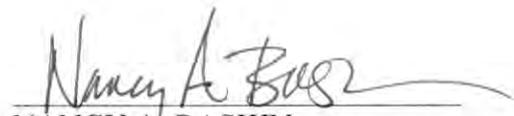
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

IT IS SO ORDERED.

DATED: 8/29/2023

  
NANCY A. BASKIN  
District Court Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following persons:

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:

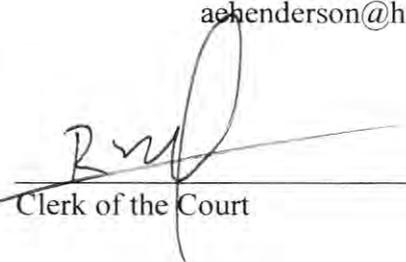
Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

Erik F. Stidham  
Jennifer M. Jensen  
Alexandra S. Grande  
Zachery J. McCraney  
Anne E. Henderson  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto:aehenderson@hollandhart.com)

DATED: 8/29/23

  
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Clerk of the Court

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,

Plaintiff(s),

-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,

Defendant(s).

Case No. CV01-22-6789

FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER FOR PERMANENT  
INJUNCTIVE RELIEF FOR  
PLAINTIFFS

In Plaintiffs' Fourth Amended Complaint, Plaintiffs sought injunctive relief in addition to any damages awarded by the jury. The Defendants were allowed to participate in the jury trial on damages including jury selection, opening statements, cross-examination and closing arguments, but all Defendants failed to appear. After seven days of trial on the issue of damages, the jury awarded the Plaintiffs certain monetary relief on their claims. The equitable relief in the form of injunctive relief was not before the jury as injunctive relief is for the Court to decide.

Having reviewed the docket, the admitted facts in the Fourth Amended Complaint due to the Defendants' default in this lawsuit, and being informed by both the evidence presented in the trial on monetary damages as well as the jury's verdicts on the Special Verdict Form, the Court issues its Findings of Fact and Conclusions of Law on the request for permanent injunctive relief.

### **Findings of Fact**

These findings of fact are primarily based on the live testimony and exhibits presented at the jury trial on damages. The exhibits are extensive and set forth the specific "statements" of the Defendants through videos, internet postings, publications, etc. The statements speak for themselves as to who made or published the statement. The statements and publications are too numerous to repeat in this case, but each exhibit was testified to in Court and only the admitted exhibits were relied on by the Court.

The testimony on the underlying events as well as care of the C.A. (the "Infant") were relevant at trial to provide background and context regarding the conduct of the Defendants. These findings of fact are supported by the substantial and competent evidence provided by credible witnesses and exhibits admitted during the trial. The Court will generally refer to the nature of statements and the contents of the statements without citing all the exhibits to support each finding of fact. All exhibits admitted are part of the Court record in this matter.

1. The Plaintiffs brought this action in response to the Defendants' statements and publications made against the named Plaintiffs, the trespass that occurred on

St. Luke's<sup>1</sup> hospitals in Meridian and Boise. The events that started the interactions between Plaintiffs and Defendants centered on the medical care of the Infant.

2. Nurse Practitioner Nadia Kravchuk, the Infant's primary care provider (PCP) saw the ten month old Infant on or about March 1, 2022. The Infant was severely dehydrated and the parents said the baby was vomiting. The Infant had lost approximately 4 pounds since its six-month wellness visit. NP Kravchuk's office was unable to provide the necessary care and IV to rehydrate the Infant in her office. The parents were directed to the St. Luke's Boise Hospital emergency room where the Infant could be rehydrated.
3. The Emergency Room (ER) doctor on duty at St. Luke's determined not only was the Infant severely dehydrated, but the Infant was suffering from severe malnutrition. The ER doctor consulted with the Pediatric Hospitalist on duty, Dr. Erickson, who agreed the Infant should be admitted. Dr. Erickson agreed with the ER doctor's diagnosis of severe malnutrition and dehydration. Dr. Erickson testified the condition of the Infant was dire and without proper medical intervention, the Infant was at risk organ failure and possible death. This was NOT a healthy baby when it arrived at the hospital on March 1, 2022. The parents reported to Dr. Erickson that the Infant was doing well until about 7 months of age and then reoccurring vomiting started and such vomiting would continue for several days. *See*, Exhibit 1, page 12.
4. Dr. Erickson is Board-Certified in both General Pediatrics and Pediatrics Hospital Medicine. She a highly trained pediatric doctor. Dr. Erickson consulted with the parents regarding the condition of the Infant. The parents agreed to the care plan to rehydrate

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<sup>1</sup> The Court will prefer to Plaintiffs St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center Ltd. Collectively as "St. Luke's."

and increase caloric intake for the Infant recommended by Dr. Erickson. At no time did Dr. Erickson threaten the parents to call child support enforcement if the parents did not agree to the treatment plan.

5. The parents did not want the Infant vaccinated. No medical provider vaccinated the Infant and that preference of the parents was respected. There was testimony by Dr. Erickson and NP Jungman, the parents' decision not to vaccinate the Infant did not in any way impact the care plan for the Infant or the respect shown the parents.
6. Prior treatment medical records for the Infant's medical care since birth were not provided by the parents and could not be obtained by Dr. Erickson beyond NP Kravchuk's limited records. This led to some additional tests being run to rule out other potential causes for the Infant's condition. Dr. Erickson noted the Infant was failing to thrive.
7. With proper medical intervention and treatment, including IVs to rehydrate, bottle feedings as well as additional feedings through a nasogastric feeding tube (NG tube), the Infant's medical condition improved.
8. Dr. Erickson arranged for St. Luke's staff and social worker to assist parents apply for and receive Medicaid so there would be no out-of-pocket cost to the family for the Infant's care. The family had no medical bills that were not paid by Medicaid for the Infant's care.
9. Dr. Erickson also arranged for a home health nurse to come to the Infant's home to check on the progress of the child and to help with any further needs for the child and family members caring for the child. Dr. Erickson explained, and the parents seemed to understand, that continuing the additional caloric intake was critical as the feeding

plan being used prior to the hospitalization was insufficient to allow the Infant to grow and thrive. Regular weight check-ins were also critical for determining if the Infant was or was not continuing with gaining weight as he had done in the hospital. The parents were trained on how to complete additional feedings via the NG tube. The parents were also advised to continue breast-feeding the Infant in addition to the other necessary feedings.

10. On March 4, 2022, the Infant's medical condition had improved to where the Infant could be cared for at home and the Infant was released to the parents with discharge instructions and verbal commitments by the parents they would comply with the instructions and call if they had questions or needed any further assistance.
11. The parents did not follow the discharge instructions for care for the Infant. Nor would the parents allow the home health nurse to come to their home to check on the Infant on March 5, 2022 or March 6, 2022.
12. Finally, on March 7, 2022, the parents took the Infant to NP Dkystra (who was not a St. Luke's medical provider but who St. Luke's had connected the family with as he would be able to assist with the NG tube and NP Kravchuk indicated she was not able to provide that level of care for the Infant). At this appointment, the Infant's weight had dropped since it was released from the hospital. NP Dkystra advised the parents how to increase caloric intake and set another appointment for March 11, 2022 to check the Infant's weight.
13. On March 11, 2022, the parents missed bringing the Infant to the scheduled appointment.

14. On March 11, 2022, NP Aaron Dkystra (not any doctor, NP or staff member of St. Luke's) called Department of Health and Welfare Child Protection Services (CPS) regarding his concern about the Infant and requesting a check on the child to make sure the weight of the Infant was not continuing to drop and thus endangering the Infant's life. NP Dkystra had a statutory duty to report his concerns regarding medical neglect by the Infant's parents.
15. A Department of Health and Welfare (DHW) Safety Assessor was assigned to the case. She also made contact with NP Jungman and law enforcement who regularly assist with investigation and welfare checks on children.
16. Going into a weekend, the need to have the Infant's status checked became a greater concern for the Infant's well-being. The DHW Safety Assessor came to Ms. Jungman's office to discuss the referral regarding the Infant. NP Jungman reviewed limited medical records. The DHW Safety Assessor could not reach the Infant's parents. NP Jungman said she would stay at work to see the Infant if parents would bring the Infant in.
17. NP Jungman has been a nurse or nurse practitioner for over 24 years. She is highly skilled based on her studies and work experience. She specializes her practice in providing clinical care and evaluation of children. She has also been trained in and has extensive experience in CPS process.
18. On March 12, 2022, the parents called and indicated they would take the child to St. Luke's Children at Risk Evaluation Services (commonly referred to by its acronym CARES unit) for a weigh-in and wellness check at 4:00 p.m. The parents never arrived for the appointment.

19. Detective Fuller of the Meridian Police Department consulted with Nurse Practitioner Jungman at CARES about what to look for when they were able to put eyes on the Infant to determine if the Infant was or was not doing well. Detective Fuller is experienced at CPS investigations and is trained in the legal standard necessary to remove a child from his or her parents' care.
20. Law enforcement attempted contact with the parents to check on the Infant at the home address provided. Defendant Rodriguez answered the door and would not let law enforcement check on the child.
21. Later that evening, law enforcement was able to track parents down in a vehicle and initiated a traffic stop to investigate the CPS referral and check on the Infant's welfare.
22. Defendants had communicated with their followers and had a large number of persons arrive at the gas station where the traffic stop occurred.
23. With the Infant being held by its mother, Detective Fuller did a welfare check on the child. The NG tube was no longer in place. The Infant presented with symptoms and observations indicating it was not doing well and was in imminent danger. The Infant and his mother were taken to the ambulance.
24. In the ambulance, the Infant was removed from the mother due to Detective Fuller's determination the Infant was in imminent danger. Detective Fuller completed the paperwork to take the Infant into the custody of DHW and to get the Infant transported to the nearest ER.
25. The Emergency Medical Technicians at the scene determined the Infant was "medically stable to transport." "Medically stable to transport" status is not the same as a patient

being medically stable and healthy and in no need of further medical care. It is simply a determination it is safe to transport the patient in the ambulance to the hospital.

26. The Infant was transported to the closest hospital, St. Luke's Meridian hospital, by ambulance.

27. At the ER, Dr. Rachel Thomas examined the Infant. She is a Board-Certified Emergency Room doctor who also has extensive medical experience and training involving children, including treatment of malnutrition and dehydration. Dr. Thomas also determined the Infant was in imminent danger/harm and needed a higher level of care that could be provided at the St. Luke's Children's Hospital at the main St. Luke's hospital in Boise.

28. Even after a bottle feeding in the ER in which the Infant gulped down 6 ounces of formula, Dr. Thomas noted the Infant's weight was less than the weight when the Infant left the St. Luke's Children's Hospital on March 4, 2022. Dr. Thomas diagnosed the Infant with severe malnutrition and dehydration that could lead to death if not immediately addressed.

29. Dr. Thomas testified that the defamatory statements and postings about her by the Defendants have led to emotional stress such that she is taking a break from medicine and leaving the community with her family for an extended period of time. It is her hope she will be able to return and actively continue her medical career.

30. Defendant Bundy arrived at St. Luke's Meridian and with others blocked the ambulance bay from other ambulances being able to come to the hospital. Bundy was demanding release of the Infant even though he was not a family member or guardian of the Infant.

31. The protesters grew in number. The Meridian Police were called. The access doors to the ambulance bay were locked. Bundy was eventually trespassed from the private property of St. Luke's and was arrested along with another person engaged in the protests in the ambulance bay.
32. With active protesting occurring at the ER, Dr. Thomas consulted with hospital security and the Meridian Police Department and had the Infant safely transported to the Children's Hospital after determining the Infant was medically stable to be transported.
33. Dr. Thomas called Dr. Erickson and asked to have the Infant admitted. Dr. Erickson agreed to the admission and immediately went to the hospital to assist with the admission of the Infant to St. Luke's Children's Hospital and to begin further treatment.
34. Even though the Infant was in the custody of the DHW, St. Luke's medical professionals informed the parents of the care plan and the parents consented to all treatment provided by Dr. Erickson as well as by the other Pediatric Hospitalists caring for the Infant.
35. Dr. Erickson confirmed the Infant had in fact lost significant weight<sup>2</sup> since its release on March 5, 2022. Another NG tube was placed, and feedings and hydration began on the Infant.
36. Other Pediatric Hospitalists also provided care for the Infant when Dr. Erickson was not on duty.

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<sup>2</sup> It is important to note that while the amounts of weight loss or gain in this case may not "sound" significant, for the age and size of the Infant in this case and where the Infant was measured at being on the growth chart (in lower than 0.5% of all infants this age), the weight loss was significant and could lead to organ failure and death.

37. NP Jungman also consulted with the Pediatric Hospitalists and participated in the phone and in-person communications with the parents during the time the Infant was at the Children's Hospital. She also stayed involved in the care when the Infant was released to DHW's caregiver.
38. The parents were regularly updated by St. Luke's employees about the Infant's status and were allowed to visit and hold the Infant for approximately two hours at the hospital on or about March 13, 2022. Other visits and communications also occurred while the Infant was at the Children's Hospital.
39. While the Infant was being treated at the Children's Hospital, the Defendants Bundy and Rodriguez, in conjunction with multiple communications sent out by the other Defendants, organized protestors at St. Luke's Boise Hospital. The protests involved hundreds of people including people armed with weapons. Defendant Rodriguez made statements on March 14, 2022 that the Infant was being abused and mistreated by St. Luke's.
40. On March 12, 2022, the Defendants and followers of the Defendants were instructed by Bundy, Rodriguez and the websites or communications from People's Rights Network (PRN) and Freedom Man Press LLC to disrupt the operations of the St. Luke's by jamming the phone lines complaining and demanding the release of the Infant.
41. Bundy and Rodriguez would not leave the private property of St. Luke's when asked. Boise Police and Idaho State Troopers were brought in to maintain the security of the hospital.

42. Eventually, the threat of risk of harm to patients, patients' families, employees and a breach of the hospital became too great and the hospital was forced into lockdown and to close the hospital to new patients.
43. Armed protesters and followers of the Defendants attempted to enter the hospital even after it was locked down.
44. After it was discovered that the Infant had been removed from the hospital, the protesters moved their demonstrations to DHW offices.
45. The Infant was doing better and was discharged from St. Luke's on March 15, 2022 to DHW custody. The parents were allowed more and more time with the Infant by DHW as part of the safety/reunification plan.
46. Through intensive medical efforts, the Infant began gaining weight and his risk of imminent harm was eliminated. The Infant required ongoing monitoring to make sure it was continuing to gain weight and thrive. Additional calories were being given via the NG tube by the Infant's caregivers.
47. DHW stayed in regular communication with CARES and the parents regarding care of the Infant. NP Jungman along with the Medical Director of CARES evaluated the Infant 3-4 times and the Infant was gaining weight.
48. On March 18, 2022, the parents called DHW as the feeding tube had inadvertently come out while the parents had care of the Infant as part of DHW's safety/reunification plan. The parents did not want to go to hospital or have the Infant seen at their home. The parents requested NP Jungman reinstall the NG tube. DHW arranged a place and time to meet the parents away from protesters who were at the main DHW office. NP

Jungman reinstalled the NG tube in the Infant, following applicable standards of care for such a procedure.

49. NP Jungman and the CARES Medical Director evaluated the Infant again on March 23, 2022 with the parents present. The follow-up weight check showed the Infant was continuing to progress. The Infant was more interactive than at previous visits. Home health and PCP care was discussed again with parents.

50. Dr. Michael Whelan, a Board-Certified Pediatrician who works at St. Alphonsus, testified he concurred in the diagnosis and all of the care provided to the Infant. He confirmed based on the medical records that the Infant was in imminent danger based on its dehydration and malnutrition and the Infant was failing to thrive. He further opined that all care provided met the standard of care and there was no medical malpractice or misdiagnoses by any medical practitioner and specifically not by either of the named plaintiffs, Dr. Erickson and NP Jungman. He opined the NG tube was necessary and appropriate both times at the hospital. He opined the discharge instructions from St. Luke's were appropriate. He opined the re-installation of the NG tube by NP Jungman was within the standard of care and did not cause any infection or disease to the Infant as the placement of the tube was into a non-sterilized location of the body, the stomach. He opined the re-installation of the HG tube did not cause an infection in the Infant.

51. Dr. Whelan also opined the parents of the Infant were "medically neglectful" for not following through on discharge instructions and with follow up visits for weight checks to make sure feedings were providing the Infant with sufficient caloric intake. Dr.

Whelan opined he believed the parents knew the Infant had lost weight after first time Infant was released from hospital on March 4, 2022.

52. Dr. Whelan opined that, based on all the outside pressure by Defendants, St. Luke's, Dr. Erickson and NP Jungman performed very well and there was no evidence that the Infant was not improving while in the care of St. Luke's.

53. Based on the testimony of Kyle Bringhurst, the Ada County Deputy Prosecutor who handled the Infant's case and has 8-9 years of experience involving CPS cases, the CPS proceedings and requisite findings for placement into DHW custody occurred as required by statute. A shelter hearing was held on March 15, 2022 and a mandatory adjudicative hearing was set. A Notice of Dismissal by the State was filed on or about May 4, 2022, so the adjudicatory hearing set for May was vacated. The Infant was returned to the custody of the parents with a safety plan.

54. David Jeppesen, Director of the Department of Health and Welfare, also testified the CPS process is defined by statute and was followed in this case. The courts, not the DHW, decide if a child is allowed to return to his or her parents. The goal is to reunite children with their parents and this goal in Idaho is achieved in about 65% of the CPS cases (which is much higher than the national average).

55. Director Jeppesen also testified the DHW does not get "extra money" for placing a child in the care of DHW per the CPS statute. The legislature sets the budget for the DHW and there is no increase in monies to the DHW for children taken into temporary custody under the CPS. Director Jeppesen also testified that allegations of child trafficking or kidnapping are untrue. While there are some adoptions of children whose parents are not fit to raise them, this is in accordance with Idaho's statutes and court

approval is required for all such adoptions. Finally, such adoptions do not happen frequently and there is no preference for persons of a particular sexual orientation as alleged by Defendants.

56. Immediately after the CPS referral was made and the Infant was removed from the parents, the Defendants Bundy and Rodriguez, through their own statements, video postings, communications with their followers and their internet postings on the websites of the other Defendants: Peoples Rights Network (PRN), Freedom Man Press, LLC and Ammon Bundy for Governor -- which Bundy and/or Rodriguez controlled-- began doxxing<sup>3</sup> and intimidating the Plaintiffs, other medical providers as well as anyone involved in the CPS matter (including but not limited to law enforcement, the prosecuting attorney, the judge handling the confidential CPS court proceedings, and the Safety Assessor for DHW).
57. Defendants' statements were intended to damage the reputations of the Plaintiffs; invade the privacy of Mr. Roth, Dr. Erickson, and NP Jungman; to shut down St. Luke's Hospital; and to threaten harm to those involved in the CPS case involving the Infant.
58. Defendants Bundy and Rodriguez are actively involved in and are spokespersons for PRN. Defendant Rodriguez controls and authors many of the statements posted on Defendant Freedom Man Press, LLC's website, which published Bundy and Rodriguez's defamatory statements on the internet and on other extremist media outlets. Bundy and Rodriguez hold themselves out to be anti-government activists motivated by certain religious beliefs. Bundy encourages militia-style training for his

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<sup>3</sup> Doxxing includes publicly identifying or publishing private information about a person as a form of punishment or revenge.

followers. He urges his followers to take action outside the law to protect their rights. Defendants Bundy and Rodriguez, PRN and Freedom Man Press, LLC are willing to encourage others to join them in using violence to reach their objectives and to harass public employees such as law enforcement, DHW employees, CPS prosecutors, and judges.

59. Bundy and Rodriguez used the tactic of “public shaming” through false and defamatory narratives to intimidate and defame the Plaintiffs. This included but was not limited to accusing the Plaintiffs to be involved in kidnapping, child trafficking, child abduction, abusing children, and stealing children for money and pedophilia. This intimidation also included releasing private information about Mr. Roth, Dr. Erickson and NP Jungman which put these Plaintiffs and their families at risk of harm as testified to at trial.
60. PRN was a supporter of Ammon Bundy for Governor, and the events in this case were the topic of Bundy at political gatherings, and defamatory statements about Plaintiffs were made by Bundy at his political events and made for the indirect purpose of raising campaign contributions.
61. Spencer Forby, an expert on extremist organizations as well as a highly trained law enforcement officer and instructor on de-escalating situations, crowd control and SWAT techniques, opined that Defendants Bundy, Rodriguez, PRN and Freedom Man Press, LLC, used their defamatory statements and disinformation rhetoric to trigger their followers to a call for action based on false premises, which then led to Defendants Bundy and Rodriguez creating conspiracy theories of heinous criminal allegations by Plaintiffs without any factual basis. In order to maximize the involvement of the

Defendants' followers, there was a strategic coordination of the false and defamatory messages being repeated over websites controlled by Defendants and shared with other extremist media outlets.

62. Defendants' followers then quickly joined the protest at the hospital and the efforts outside Idaho to disrupt the business of St. Luke's by flooding the phone lines. The false and defamatory statements of Bundy and Rodriguez were then used by followers and the Defendants to harass and intimidate the Plaintiffs via verbal, in-person and online threats.

63. Bundy directed his followers to be ready to "fight it out on the street." Bundy and Rodriguez created a false and defamatory conspiracy theory against the Plaintiffs and repeated it over and over again in an effort to have St. Luke's put out of business and the medical providers to lose their jobs. The Plaintiffs testified they believed the statements presented real threats of violence to them personally as well as their families. Plaintiffs testified as to the specific steps they took as a result of the intimidation and defamatory statements to protect themselves and their family members. Plaintiffs also testified to having to daily track the social media of all the Defendants to weigh and prepare for threatened harm.

64. According to Jessica Flynn, an expert on reputational harm, and Beth Toal, St. Luke's Vice President for Communications, Bundy's and Rodriguez's tactics are deliberate and intentional. Their marketing techniques and use of social media have the effect of disseminating knowingly defamatory information and disinformation to radicalize their followers and at the same time get media coverage of their actions and raise monies for their organizations based on their defamatory statements. The Defendants wanted their

messages to go viral as well as deep and wide, and to have lasting effects. The Defendants wanted their social media attack and protests to prevent St. Luke's from providing services to others. The Defendants also created a clear connection in their social media for contributions to support their conduct. The media recognition gained by the Defendants through their disinformation and defamatory statements is intended to raise their individual profiles as well as their organizations' profiles.

65. The extremist and marketing experts testified the Defendants also used the Infant being taken into CPS custody to increase their own visibility on the internet and in the community as well as to raise money for themselves through the organizations they controlled. This conduct continues to the present and it is not expected to stop as it is a source of fundraising for Bundy's and Rodriguez's organizations.
66. Defendants Bundy and Rodriguez organized and promoted the protests at St. Luke's. These protests involved armed individuals, which is consistent with Bundy's involvement in prior protests and his statements/trainings of his followers about the use of force. The experts testified that the militia training promoted and offered by PRN creates a threat and possible risk of physical harm.
67. On the advice of law enforcement, who indicated they could not restrain the number of protesters (estimated to be 400 persons), St. Luke's was forced to lock down the entire downtown campus and to redirect patients to other facilities.
68. The lockdown also prevented families from entering the hospital to see their loved ones, prevented third parties from seeking care or attending a scheduled appointment at the Boise campus, and prevented employees from coming or leaving their shifts.

69. St. Luke's Chief Financial Officer as well as Dennis Reinstien, CPA, testified that economically St. Luke's lost significant revenue from cancelled treatment or appointments. St. Luke's also incurred additional security costs during the protests and had to increase the number of individuals involved in security at all of its facilities to be prepared for future protests organized by the Defendants.
70. The Defendants knew or reasonably should have known the statements they were making were false and defamatory. Defendant Rodriguez is the grandfather of the Infant and the medical records provided to his daughter (mother of the Infant) easily could have been reviewed by him. Instead, he made false and defamatory statements regarding the health of the Infant, the actual medical care diagnoses and the care provided.
71. Rodriguez also claimed without any legal statutory support that the actions of the CPS were unlawful and was involved with a marketing plan for donations for the Infant and its family, as well as to monetize his and Bundy's organizations.
72. No evidence was presented that any of the Defendants have medical training, knowledge or education to support their false and defamatory statements regarding the Infant's health status and the need for medical care.
73. The intentional, materially false and malicious defamatory statements by the Defendants include, but are not limited to, the following:
- a. The Infant was perfectly healthy when taken by CPS.
  - b. St. Luke's made the Infant sick and infected the Infant with disease.
  - c. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.

- d. St. Luke's, St. Luke's management, law enforcement, DHW, the courts, and the medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- e. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- f. DHW makes more money for every child it takes into CPS custody and that is why the DHW kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- g. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- h. St. Luke's reported the parents to CPS.
- i. Dr. Erickson threatened to file a report with CPS if the parents did not agree to the treatment plan between March 1-4, 2022.
- j. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
- k. The family was discriminated against because the Infant was unvaccinated.
- l. The parents have thousands of dollars of medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
- m. The parents did not consent to the medical treatment provided to the Infant.

n. The Infant was released from the Children's Hospital and returned to directly to the family due to *the protesters'* or Defendants', actions.<sup>4</sup>

74. These false statements were repeated again and again by Defendants, including using links to the statements on other websites and video recordings. "Wanted" posters were made for Mr. Roth, Dr. Erickson and NP Jungman (as well as others involved who were doxxed) and posted on the internet as well as distributed at the protests at the St. Luke's Boise campus. The Plaintiffs and others involved in the events were repeatedly threatened by Defendants' actions of encouraging their followers to take action into their own hands and disclosing personal information about Mr. Roth, Dr. Erickson and NP Jungman. Phone messages to St. Luke's from followers across the county repeated the false and defamatory statements of Bundy and Rodriguez.

75. St. Luke's senior management officers testified it is now more difficult to recruit doctors and other medical providers to Idaho due to the events surrounding the Infant and the Defendants' harassment and defamatory statements towards St. Luke's and its employees.

76. The defamatory statements by the Defendants were completely unfounded, false, made intentionally, and maliciously harmed the reputations of the Plaintiffs and others who were doxxed. These false statements invaded the privacy of Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman by portraying them in a false light as persons who harm children. The defamatory statements and conduct of the Defendants intentionally inflicted emotional distress on Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman as

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<sup>4</sup> The Infant was returned to its parents by the Court through the dismissal of the CPS case, not the actions of Defendants.

well as other parties who were doxxed and threatened. Mr. Roth, Dr. Erickson and NP Jungman all presented substantial and credible evidence of the actual harm they (and their families) suffered due to Defendants' defamatory statements, invasion of privacy and intentional infliction of emotional distress upon Plaintiffs by attacking their professional reputations.

77. Experts Devin Burghart, Spencer Fomby, and Jessica Flynn all testified that once on the internet, it is difficult to remove defamatory statements from the internet. In this case, the Defendants took steps to regularly re-post prior videos and postings and to create links to the false statements on the website of other media sources, thereby knowingly increasing the viewers of the published defamatory statements. The original posts as well as present statements continue on the Internet such as when Bundy or Rodriguez are quoted with links to other websites about this litigation. See Idaho Dispatch quotes and postings in the Declaration of Jennifer Jensen in support of the requested injunctive relief.
78. The extremist organization experts testified the defamatory statements are re-posted by the Defendants in order to keep them in the news and to generate new followers and more donations.
79. C.P. "Abby" Abbodandolo, Senior Director of Security for St. Luke's, who has extensive hospital security and law enforcement experience, testified he was shocked how quickly the Defendants could mobilize their followers to protest, make signs, and come armed and ready to take action. He also testified the Defendants and their followers create an ongoing threat to St. Luke's operations throughout the state.

80. The DHW Safety Assessor left DHW employment and moved out of state due to the doxxing. Dr. Thomas testified she is leaving and moving from the state for a period of time in hopes that she can safely return to practice medicine. Employees left St. Luke's employment due to the protesting and intimidation. Dr. Erickson has considered leaving a job she loves due to the ongoing emotional distress and intimidation of the Defendants. NP Jungman has suffered and continues to suffer from emotional distress, and the intimidation affects how she interacts with parents of other patients.
81. The extremist group experts Burghart, Fomby, and Flynn described both Bundy and Rodriquez as an anti-government activists, conflict disrupters, and disrupter entrepreneurs. Their business model is to raise money for themselves or the organizations they control from followers based on false, fraudulent and defamatory statements. The Defendants have used disinformation (misinformation that is intentionally spread) to harm Plaintiffs.
82. Dr. Camille LaCroix, Forensic Psychiatrist, testified as to the continuing emotional distress to Dr. Erickson and NP Jungman, and that this is not likely to go away and gets worse every time there is a new or a re-posting of a defamatory statement, an article or threat against them personally. Dr. Erickson's husband testified as to the need to continually monitor social media postings to make sure his wife and family are safe. According to Dr. LaCroix, Dr. Erickson and NP Jungman can be triggered and suffer more emotional distress by the re-posting of defamatory statements and invasions of their privacy that cause them to change how they treat others and how they protect their families.

83. Dr. Erickson and NP Jungman each testified that defamatory statements, harassment and intimidation as a result of Defendants' actions affects their life every day professional and in their personal relationships. Both testified as to the constant fear they have due to Defendants defamatory attacks in the newspapers, on tv, and on the internet.

84. The evidence provided at the jury trial was substantial and competent evidence that established the claims of defamation, invasion of privacy and intentional infliction of emotional distress due to the Defendants' conduct. These claims were satisfied by the applicable burden of proofs of preponderance and clear and convincing evidence.

85. As to the defamation claims, the Court finds:

- a. The Defendants communicated information concerning the Plaintiffs to others;
- b. The information impugned the honesty, integrity, virtue or reputation of the Plaintiffs or exposed the Plaintiffs to public hatred, contempt or ridicule;
- c. The information was false;
- d. The Defendants knew it was false or reasonably should have known that it was false; and
- e. Plaintiffs suffered injury caused to the defamation.

86. As to the Invasion of Privacy claims, the Court finds:

- a. The Defendants placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye by publicly disclosing some falsity or fiction concerning Mr. Roth, Dr. Erickson, and NP Jungman.
- b. A disclosure of some falsity or fiction means that a publication or publications by

Defendants were materially false.

- c. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman suffered injury caused by the false light invasion of their privacy.

87. As to the Intentional Infliction of Emotional Distress claims, the Court finds:

- a. Defendants engaged in intentional or reckless conduct;
- b. That was extreme and outrageous;
- c. Causing severe emotional distress to Mr. Roth, Dr. Erickson, and NP Jungman;  
and
- d. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman were injured and the emotional distress was proximately caused by Defendants' conduct.

88. The Defendants' defamatory statements including allegations of conspiracy by the Plaintiffs, law enforcement, the courts and DHW to engage in criminal conduct against children is not supported by any evidence.

89. The false and defamatory statements were made as part of a tactical and sustained marketing campaign to defame and smear the reputations of the Plaintiffs, incite unlawful conduct by Defendants' followers, create a fear of future physical harm to Plaintiffs, and to create an incentive for followers to make donations to Defendants or organizations they controlled.

90. The Defendants actions in this case, as well as the fact that they refuse to stop making defamatory statements, repeat past defamatory statements, presents a continuing threat of actual irreparable harm to Plaintiffs. The continuing threat has led to St. Luke's increasing its security at each of its hospitals. The named Plaintiffs continue to be the subject of threats by Defendants or their followers. The threats include but are not

limited to personal, professional or family member harm through Defendants internet presence and re-posting of prior defamatory statements. A prior Protection Order by the Court has failed to deter Defendants from making knowingly false and defamatory statements and repeating such statements.

### **Conclusions of Law**

The Court requested supplemental legal support for Plaintiffs position they are entitled to equitable relief in the form a permanent injunction. Plaintiffs file a memorandum and supplemental brief and declaration in support of the request injunctive relief. In the Declaration of Jennifer M. Jensen, she indicates the Idaho Dispatch (which is not a party to this lawsuit) continues to post Defendant Rodriguez's and Bundy's defamatory statements about the Plaintiffs and counsel involved in this case on the internet even after the jury trial on damages has ended. Defendant Rodriguez filed an "Answer to Request for Permanent Injunctive Relief."<sup>5</sup> The Court has considered the findings of fact and the entire court record including Rodriguez's filings in making its ruling on injunctive relief.

#### **1. Whether or not to grant permanent injunctive relief is within the discretion of the trial court.**

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<sup>5</sup> Defendant Rodriguez claims in part there has never been an evidence-based trial as to whether or not the things he said were true and he believes all his statements were true. The Court notes the jury trial was evidence-based (with testimony and admitted exhibits), but Defendant Rodriguez elected not to attend and cross examine witnesses or challenge the admissibility of evidence. Defendant Rodriguez also claims injunctive relief is a violation of his First Amendment rights. For the reasons discussed in this Findings of Fact and Conclusions of Law, the Court finds injunctive relief is allowed as a matter of law and appropriate in this case.

In *Gem State Roofing, Incorporated v. United Components, Incorporated*, 168 Idaho 820, 828, 488 P.3d 488, 496 (2021), the Idaho Supreme Court held “The granting or refusal of an injunction is a matter resting largely in the trial court’s discretion.” (citing *Higginson v. Westergard*, 100 Idaho 687, 689, 604 P.2d 51, 53 (1979)). In applying its discretion, this Court must: (1) correctly perceive the issue as one of discretion; (2) act within the outer boundaries of its discretion; (3) act consistently with the legal standards applicable to the specific choices available to it; and (4) reach its decision by the exercise of reason. *Lunneborg v. My Fun Life*, 163 Idaho 856, 863, 421 P.3d 187, 194 (2018). The Supreme Court in *Gem State Roofing* went on to discuss the different standards for preliminary versus permanent injunctions:

As an initial observation, UCI's reliance on the standard for a *preliminary* injunction is inapposite. Rule 65(e) enumerates five grounds for entry of a preliminary injunction. A preliminary injunction is a temporary injunction effective for the pendency of the litigation before the merits of the case are decided. I.R.C.P. 65(e). Preliminary injunctions are designed to protect clearly established rights from imminent or continuous violation during litigation. See *Gordon v. U.S. Bank Nat'l Ass'n*, 166 Idaho 105, 455 P.3d 374, 384 (2019) (quoting *Brady v. City of Homedale*, 130 Idaho 569, 572, 944 P.2d 704, 707 (1997)) (“A district court should grant a preliminary injunction ‘only in extreme cases where the right is very clear and it appears that irreparable injury will flow from its refusal.’”). A permanent injunction, on the other hand, is entered at the resolution of the case, and requires a showing of threatened or actual irreparable injury; in addition, in order to deny a permanent injunction the trial court must be persuaded that there is “no reasonable expectation that the wrong will be repeated.” *O'Boskey*, 112 Idaho at 1007, 739 P.2d at 306. In other words, a trial court may appropriately deny a preliminary injunction at the outset of a case when there are complex issues of fact and law yet to resolve, but correctly grant a permanent injunction once those issues have been resolved in favor of the plaintiff.

*Gem State Roofing*, 168 Idaho 820, 834–35, 488 P.3d 488, 502–03 (2021).

In this case, the Court finds based on the Findings of Fact and the Declaration of Jennifer Jensen, the Plaintiffs have established by substantial and competent evidence of threatened or

actual irreparable damage as well as a reasonable expectation that the wrong will be repeated by the Defendants if permanent injunctive relief is not granted. The jury's monetary damages, if able to be collected, are inadequate to protect Plaintiffs from continued and ongoing injuries to their reputations, privacy, emotional health, ability to practice their chosen professions and reside in the community without fear, and to allow the community to trust that St. Luke's hospital system is not in any way engaged in heinous criminal conduct towards its patients. Balancing the hardships between Plaintiffs and Defendants' alleged chilling of their freedom of speech rights, the balance tips in favor of Plaintiffs. A remedy in equity is warranted as defamatory speech is not protected free speech. Finally, the public interest would not be disserved by a permanent injunction of the scope outlined in this decision. The permanent injunctive relief is appropriate to eliminate the ongoing irreparable threatened and actual harm to all Plaintiffs.

**2. Defendants' defamatory statements are not protected speech under the First Amendment.**

The United States is a republic founded on the doctrine of the rule of law. What that means is all persons are expected to follow the laws adopted through our representational form of government. It also means all persons, no matter their status, wealth or beliefs must follow the rule of law.

The First Amendment to the United States Constitution provides:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press or the right of the people to peacefully assemble, and to petition the Government for a redress of grievances.

However, these rights are not absolute. Every right under the Constitution is subject to limits, and a person or entity cannot make or publish knowingly false statements that intentionally cause reputational or other damage to another and then hide behind the First Amendment as a shield. The

United States Supreme Court has recognized categories of speech that the government can regulate because of the content of the speech, as long as the government does so evenhandedly. *See R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992) (categories of speech that are limited: obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, and child pornography). In *R.A.V.* the Court stated:

The First Amendment generally prevents government from proscribing speech, *see, e.g., Cantwell v. Connecticut*, 310 U.S. 296, 309–311, 60 S.Ct. 900, 905–906, 84 L.Ed. 1213 (1940), or even expressive conduct, *see, e.g., Texas v. Johnson*, 491 U.S. 397, 406, 109 S.Ct. 2533, 2540, 105 L.Ed.2d 342 (1989), because of disapproval of the ideas expressed. Content-based regulations are presumptively invalid. *Simon & Schuster, Inc. v. Members of N.Y. State Crime Victims Bd.*, 502 U.S. 105, 115, 112 S.Ct. 501, 508, 116 L.Ed.2d 476 (1991) *id.*, at 124, 112 S.Ct., at 512–513 (KENNEDY, J., concurring in judgment); *Consolidated Edison Co. of N.Y. v. Public Serv. Comm'n of N.Y.*, 447 U.S. 530, 536, 100 S.Ct. 2326, 2332–2333, 65 L.Ed.2d 319 (1980); *Police Dept. of Chicago v. Mosley*, 408 U.S. 92, 95, 92 S.Ct. 2286, 2289–2290, 33 L.Ed.2d 212 (1972). From 1791 to the present, however, our society, like other free but civilized societies, has permitted restrictions upon the content of speech in a few limited areas, which are “of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality.” *Chaplinsky, supra*, 315 U.S., at 572, 62 S.Ct. at 762. We have recognized that “the freedom of speech” referred to by the First Amendment does not include a freedom to disregard these traditional limitations. *See, e.g., Roth v. United States*, 354 U.S. 476, 77 S.Ct. 1304, 1 L.Ed.2d 1498 (1957) (obscenity); *Beauharnais v. Illinois*, 343 U.S. 250, 72 S.Ct. 725, 96 L.Ed. 919 (1952) (defamation); *Chaplinsky v. New Hampshire, supra* (“ ‘fighting’ words”); *see generally Simon & Schuster, supra*, 502 U.S., at 124, 112 S.Ct., at 513–514 (KENNEDY, J., concurring in judgment). Our decisions since the 1960's have narrowed the scope of the traditional categorical exceptions for defamation, *see New York Times Co. v. Sullivan*, 376 U.S. 254, 84 S.Ct. 710, 11 L.Ed.2d 686 (1964); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974); *see generally Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 13–17, 110 S.Ct. 2695, 2702–2705, 111 L.Ed.2d 1 (1990), and for obscenity, *see Miller v. California*, 413 U.S. 15, 93 S.Ct. 2607, 37 L.Ed.2d 419 (1973), but a limited categorical approach has remained an important part of our First Amendment jurisprudence.

We have sometimes said that these categories of expression are “not within the area of constitutionally protected speech,” *Roth, supra*, 354 U.S., at 483, 77 S.Ct., at 1308; *Beauharnais, supra*, 343 U.S., at 266, 72 S.Ct., at 735; *Chaplinsky, supra*, 315 U.S., at 571–572, 62 S.Ct., at 768–769; or that the “protection of the First Amendment does not extend” to them, *Bose Corp. v. Consumers Union of United*

*States, Inc.*, 466 U.S. 485, 504, 104 S.Ct. 1949, 1961, 80 L.Ed.2d 502 (1984); *Sable Communications of Cal., Inc. v. FCC*, 492 U.S. 115, 124, 109 S.Ct. 2829, 2835, 106 L.Ed.2d 93 (1989).

*R.A.V. v. City of St. Paul*, 505 U.S. 377, 382–83 (1992).

Stated another way, defamation is a limit on both freedom of speech and freedom of the press. A person or entity cannot say “I believed what I was saying was true” when the undisputed facts establish those “truths” were known to be false or should have been known to be false by the Defendants and they were spoken with the specific intent to threaten or cause harm to the other person or entity.

The defamatory statements made by Defendants here were not just disagreements with the manner in which the CPS laws are enforced. Instead, the defamatory statements by Defendants were made intentionally to get others to believe “as true” that Plaintiffs and anyone else involved in the CPS investigation and court proceedings or medical treatment of the Infant were committing heinous acts against the Infant, and that St. Luke’s and the other Plaintiffs were “wicked” and “evil” persons such that they should be removed from their professions and the hospital shut down from providing all medical care to anyone in our community. There is no evidence (only baseless allegations by Defendants) of any such conduct by the Plaintiffs or any other party involved in the CPS case involving the Infant. In a court of law, the party claiming truth as a defense must present evidence of truth, and Defendants did not do so.

Here, the Defendants’ statements in every possible form were intentional and with reckless disregard for the truth, fraudulent, malicious and defamatory. As the jury instructions explained, defamation is the injury to one's reputation either by written expression, which is libel, or by oral expression, which is slander. The law is well-established that speech which is defamatory and causes harm is not protected by the First Amendment. As indicated in the above quote from the

Supreme Court, defamation in our common law existed prior to the founding of this country and has been recognized since 1791 by our courts. Further, the mere fact that religious beliefs are cited as motivation for the Defendants' actions does prevent the statements from being defamatory or illegal invasions of another's right to privacy.<sup>6</sup> Nor does the cloak of the Defendants' religious beliefs that the Plaintiffs were "wicked" allow First Amendment protection to the statements such that the statements cannot also be defamatory.

Additionally, the United States Supreme Court recently reaffirmed fraudulent statements made to encourage or induce illegal immigration for financial gain are not protected speech under the First Amendment. *See United States v. Hansen*, 2023 WL 4138994, \_\_\_ U. S. \_\_\_, 143 S.Ct. 1932 (2023). "Speech intended to bring about a particular unlawful act has no social value; therefore, it is unprotected." *Williams*, 553 U.S. at 298, 128 S.Ct. 1830." *Id.* at 1947 (2023). Defendants' conduct in this case included false, fraudulent and defamatory statements made in part for their own financial gain and such speech is not protected. People are free to give money to whatever organizations or persons they want, but they should be informed if the statements to support such donations of monies are not true.

Finally, simply saying a statement over and over does *not* make it true. It is well-established law that a person can tell certain lies and those lies are protected by the First Amendment. *See United States v. Alvarez*, 567 U.S. 709 (2012) where an individual was being criminally prosecuted for falsely claiming to have received a military medal of honor pursuant to the Stolen Valor Act was a content-based restriction on free speech. The difference here is that Defendants' statements were not lies about themselves; they were false, intentional and defamatory statements about others which were intended to hurt Plaintiffs' reputations or businesses. No reasonable person would

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<sup>6</sup> Indeed, the Court cannot to find any religious support for bearing false witness against another.

think these statements were meant for any other purpose than to harm the reputations and to threaten the persons being attacked by such statements. Such statements are not protected speech under the First Amendment.

Listening to and watching the videos of the Defendants and the published written statements of the Defendants Bundy and Rodriguez that claim their belief that “they” had the individual “right” to take the Infant (who is not even their child) back by violence if necessary is a profound misstatement and misunderstanding of the rule of law. In reality, it is a cry for “vigilante justice” which is the act of enforcing the law without legal authority to do so. Vigilante justice does not involve due process and allows one person to be the lawmaker, the law enforcer, the judge and jury without any investigation into the truth. Vigilante justice is not a “right” an individual or group of individuals have in this country.

Laws are passed by duly elected persons through a legislative process involving two representational governmental bodies and then also approved by the executive officer (the President of the United States or the Governor of a state). Laws are enforced by law enforcement officers in the executive branch of government. Challenges to the laws as being facially unconstitutional or unconstitutional as applied are for the judicial branch to decide.

Vigilante justice is not tolerated under the Constitution because it violates the rights of the accused. Vigilante justice expounded by the Defendants is meant to control others not by the rule of law, but by intimidation through threats of violence and the public shaming of others. Defendants clearly believe they are above the law and can operate outside the boundaries of our laws if they disagree with how the laws are being applied. That is not how our government works. A party can appeal a court’s ruling and seek appellate review of a decision. The manner in which

to challenge any court's ruling is not through threat and intimidation. It is through the judicial process.

Moreover, if Defendants want the CPS statutes to be revised or changed, then they can lobby the legislature. While it is unclear exactly what changes to the law the Defendants seek, they are free to propose changes by working directly with legislators to sponsors bills. The Idaho Legislature has a long history of protecting children through the DHW, and nothing in this trial established the procedure approved by the Legislature was not followed or was misapplied based on the true health status of the Infant and the failure of the parents to allow the Infant to be seen for follow-up care. In fact, this case is an example of the CPS system working exactly as intended by the Legislature to protect the well-being of a child.

In several of the published statements by Defendants Bundy and Rodriguez they encouraged their followers to "follow the money" to prove how children are being harmed, trafficked, or kidnapped by CPS. No actual evidence was cited for this proposition by the Defendants and it was proven to be false at trial. Instead, the evidence in this case shows the only money being "made" by the events involving the Infant were St. Luke's and other medical practitioners receiving Medicaid reimbursement for the medical services provided (which was testified to be 70% of the actual cost of the care) and money flowing from donations by Defendants' followers (based on false defamatory statements about the Plaintiffs and others) to Defendants Bundy, Ammon Bundy for Governor, Rodriguez, People's Rights Network, Freedom Man Press LLC and Freedom Man PAC.

If Defendants wanted to present a defense of the "truth" of their statements, they could have participated in this lawsuit or at least the damages trial. They did not. The Court must take the undisputed facts presented at trial as true. Moreover, independent expert medical testimony as

well as common sense establishes the facts were not as Defendants maintained. The actual numerous weights taken of the Infant as well as the results of other medical tests and the pictures of the Infant did not present a healthy infant. Dr. Wheaton testified there was no misdiagnosis or malpractice by the medical providers.

The Court finds St. Luke's did not initiate nor threaten to initiate CPS action. Did St. Luke's become involved after the Infant was taken into the custody of DHW? Yes. However, no child was "kidnapped" by the police or doctors. No child was "trafficked" or abused by DHW, the hospital, the doctors or the courts. Instead, St. Luke's through its staff and medical providers provided the *necessary* medical care the Infant needed (twice) and took care to receive the parents' consent for the care provided even though during the second hospitalization was when the Infant was in the temporary care and custody of DHW. All of the Infant's medical care was covered by Medicaid insurance.

Dr. Whelan testified the need for CPS to get involved was due to the parents' failure to attend follow-up appointments. In making this last statement, the Court does not in any way believe the parents intended to harm the Infant. But the parents did neglect the medically needed follow-up appointments to make sure the Infant was gaining, not losing, weight. New parents have a plan for how they want to care for their child and they are allowed great freedom in implementing their plan, until and unless the child's welfare is at risk. At that point, the DHW has a duty to step in, to get the child the care it needs and then to develop a reunification plan so the child can return to its home and thrive.

### **3. Permanent injunctive relief is appropriate in this case.**

Permanent injunctive relief requiring the Defendants to stop making defamatory statements about the Plaintiffs, to remove defamatory and harassing statements or posts from online locations under the Defendants' control and prohibiting the Defendants from republishing the statements or posts is appropriate in this case. The statements, internet posts, online interviews made as part of a sustained campaign of defamation by Defendants and they continue to threaten or cause actual irreparable harm to the Plaintiffs. Based on the testimony of Mr. Roth, Dr. Erickson, NP Jungman, this conduct not only affects the individual Plaintiffs, but it also affects their families, their co-workers, their work environments. It also continues to negatively impact the reputation of St. Luke's in the community. The Court has no expectation that the defamatory statements will stop by Defendants without a permanent injunction.

This type of conduct can be enjoined by a court. While the Court could not find any on-point Idaho authority for the factual circumstances presented in this case, the Court can look to other jurisdictions for persuasive authority for internet smear campaigns. *See, e.g., Balboa Island Vill. Inn, Inc. v. Lemen*, 40 Cal. 4th 1141, 1155-57 (2007) (holding that the court may issue an injunction prohibiting the defendant from repeating statements judicially determined to be defamatory and rejecting argument that damages are the only remedy for defamation because otherwise the plaintiff would be required to bring a succession of lawsuits for damages which could be insufficient to deter the continuing tortious behavior); *Advanced Training Sys. v. Caswell Equip. Co.*, 352 N.W. 2d 1, 11 (Minn. 1984) (affirming permanent injunctive relief prohibiting republication of material found libelous at trial); *Weitsman v. Levesque*, Case No. 19-CV-461 JLS (AHG), 2020 WL 6825687, (S.D. Cal. Nov. 20, 2020) (applying New York law and collecting New York cases that removal orders are

necessary when parties refuse to depublish); *see also St. James Healthcare v. Cole*, 178 P.3d 696, (Mont. 2008) (affirming in part preliminary injunction against harassing and threatening statements).<sup>7</sup>

In *Weitsman*, the court ordered permanent injunctive relief when the defendant engaged in a “sustained Internet defamation campaign” falsely accusing the plaintiff of child trafficking. *Weitsman*, 2020 WL 6825687. The court entered default against the defendant, and the plaintiff obtained an award of compensatory and punitive damages. *Id.* The defendant had continued making the defamatory statements online, despite the litigation and an arrest warrant. *Id.* A permanent injunction was appropriate due to the intentional, sustained campaign of defamation aimed to injure the plaintiff’s interests, including business interests. *See id.* The injunction was tailored to (1) require the removal of statements held to be defamatory whose postings online were under the defendant’s control; and (2) prohibit the republication of statements held to be defamatory. *See id.*

The Defendants’ actions attacking Plaintiffs in this case were relentless for over a year and with the specific intent to harm the reputations of St. Luke’s and the other named Plaintiffs who did their job to ensure the Infant received necessary medical care. The Defendants continue to the present time in making defamatory statements to others about the Plaintiffs. There is every indication based on the Defendants’ conduct over the prior year that the Defendants will continue to repeat and re-post the defamatory statements if no injunction is entered. The Court recognizes the Defendants have the means to influence thousands of followers, as they quickly organized protestors at the hospitals and across the country to disrupt St. Luke’s business. This ability to mobilize others and to condone violence makes the threatened irreparable harm even more likely.

As several experts testified at trial, that once on the internet, it is difficult to remove defamatory statements from the internet, a simple retraction is inadequate relief for the Plaintiffs. Plaintiffs are entitled by law to have all the Defendants do everything in their power and on all

sites under their control (directly or indirectly) to remove all the judicially determined defamatory statements about the Plaintiffs. Moreover, the Defendants are ordered to stop making new or repeating previously made statements or postings with defamatory statements about the Plaintiffs. Further defamatory statements or invasion of Plaintiffs' privacy regarding the events with the Infant by Defendants could lead to new litigation for defamation. This defamation against the Plaintiffs is not protected by the First Amendment and it must end.

If the defamatory statements are not taken down, they will be repeated and cause more irreparable threatened or actual harm to the Plaintiffs. The Plaintiffs have a right under law to seek injunctive relief from the Court to force the Defendants to stop making and publishing defamatory statements about the Plaintiffs. Plaintiffs followed the rule of law and legal process for having such a remedy ordered by the Court. The Plaintiffs proved the statements were intentional, false and made by Defendants with the specific intent to cause reputational damage to the Plaintiffs and to invade the Plaintiffs' privacy. The Defendants continue to try to raise monies based on the defamatory statements.

#### **4. Scope of injunctive relief.**

The Court, in exercising its discretion, finds a permanent injunction is warranted under the law against the Defendants in this case. The Court exercises its discretion based on the findings of fact and conclusions of law to grant the equitable relief requested. "A permanent injunction requires a showing of threatened or actual irreparable injury." *Hood v. Poorman*, 171 Idaho 176, 519 P.3d 769, 783 (2022) (citing *O'Boskey v. First Fed. Sav. & Loan Ass'n of Boise*, 112 Idaho 1002, 1007, 739 P.2d 301, 306 (1987)). There is a threatened or actual irreparable injury to Plaintiffs if defamatory statements about the care of the Infant and the Plaintiffs are not stopped. The Defendants are aware their statements have been found by a jury and court of law to be

defamatory, so continuing to say the statements are true may expose Defendants to additional legal liability.

Defendants will be ordered to take the following actions to remove all defamatory statements and violations of the privacy of the Plaintiffs. Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

Failure by the Defendants to follow the Order for Permanent Injunctive Relief may lead to contempt proceedings, sanctions and other legal ramifications.

## **Conclusion**

Fortunately for the Infant and our community, the Plaintiffs ignored the actions of the disrupters led by Bundy and Rodriguez and instead made saving the life of the Infant their priority. Plaintiffs St. Luke's and Mr. Roth were not distracted from their mission of providing medical care when needed to any member of our community regardless of a person's ability to pay. St. Luke's followed established medical treatment procedures and DHW followed Court orders, not the demands of the Defendants. Dr. Erickson and NP Jungman followed their oaths to help and not harm their patient. But the disinformation continues by Defendants even after the Infant was returned to its parents by the court through the CPS proceedings, even after the civil lawsuit was filed, and even after the jury verdict was returned.

Defendants' continued disinformation regarding the Plaintiffs does not help our community. The actions and conduct of the Defendants have made our community less safe. Medical providers and other employees are leaving their professions because of the damage to their reputations, the invasion of their privacy, the harassment and threats of intimidation by Defendants. Defendants' conduct and the conduct of their followers selfishly prevented third parties from coming to the St. Luke's hospitals and clinics for care, prevented the family members of other patients from seeing their loved ones at the hospital, disrupted the care of other patients, and threatened the safety of employees due to the sheer noise and intimidation of armed protestors surrounding the Boise hospital. The First Amendment protects and allows citizens to protest, but the First Amendment does not allow armed citizens to attempt to enter the private property of St. Luke's when it was locked down.

The defamatory statements of Defendants against the Plaintiffs have the indirect effect of making it more difficult to attract medical professionals to Idaho. The defamatory statements have

the direct effect of causing highly qualified medical professionals to leave the profession they love due the stress from the intimidation and threats of personal harm by Defendants and their followers. The defamatory statements have the direct effect of making it more difficult for other community members to safely access medical care when needed.

A permanent injunction is warranted and appropriate in this case to stop Defendants from reposting and repeating statements that have been deemed by a jury and the Court to be defamatory and harmful to the reputational interests, privacy interests and emotional health of the Plaintiffs. A retraction by Defendants is insufficient to reverse the continued threat of irreparable harm to the Plaintiffs. Monetary damages, even if they can be collected, are inadequate to protect against further harm to the Plaintiffs or to deter Defendants. In order to avoid the threatened or actual irreparable harm to Plaintiffs reputations, professions, emotional health, the defamatory statements of the Defendants must to be removed from the online sources controlled by Defendants (directly or indirectly) and no longer repeated orally by Defendants.

### **Order**

Based on the Findings of Fact and Conclusions of Law, the injunctive relief requested by the Plaintiffs is appropriate and shall be ordered by the Court in a separate Permanent Injunction Order. Plaintiffs shall submit a proposed Permanent Injunction Order for the Court's review consistent with these Findings of Fact and Conclusions of Law. Plaintiffs are also directed to provide a proposed Default Judgment to be entered consistent with this Order, the jury verdict and previous attorney fees as sanctions ordered by the Court.

IT IS SO ORDERED.

Dated: 8/25/23

  
NANCY A. BASKIN  
District Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/25/23, I caused a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR INJUNCTIVE RELIEF to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following person(s):

Erik F. Stidham (X) Email  
Jennifer M. Jensen  
Zachery J. McCraney  
Alexandra S. Grande  
efstidham@hollandhart.com  
jnjensen@hollandhart.com  
zjmccraney@hollandhart.com  
aehenderson@hollandhart.com  
*Attorney for Plaintiff(s)*

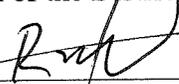
Diego Rodriguez (X) Email  
freedommanpress@protonmail.com  
*Pro Se Defendant*

Ammon Bundy, Ammon Bundy for Governor, (X) Mail  
and People’s Rights Network  
c/o Ammon Bundy  
4615 Harvest Lane  
Emmett ID 83617-3601  
*Pro Se Defendant*

Ammon Bundy for Governor (X) Mail  
And People’s Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett ID 83617  
*Pro Se Defendant*

Freedom Man Press LLC and Freedom Man PAC (X) Mail  
c/o Diego Rodriguez  
1317 Edgewater DR #5077  
Orlando, FL 32804  
*Pro Se Defendant*

TRENT TRIPPLE  
Clerk of the District Court

By   
Deputy Clerk

# EXHIBIT H

---

**From:** Erik Stidham  
**Sent:** Wednesday, September 20, 2023 9:54 AM  
**To:** 'Freedom Man Press'  
**Subject:** Cease and Desist-Violation of Permanent Injunction  
**Attachments:** 2023-09-20 Cease and Desist Letter to FM Press.pdf; 2023-09-20 Cease and Desist Letter to PRN.pdf

Mr. Rodriguez,

You continue to post false statements in violation of the Court's permanent injunction. See attached.

Regards,



**Holland  
& Hart**

**Erik Stidham**  
Partner

**HOLLAND & HART LLP**  
800 W. Main Street, Suite 1750, Boise, ID 83702  
[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com) | **T:** (208) 383-3934

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

September 20, 2023

**VIA U.S. MAIL AND E-MAIL**

Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Drive, #5077  
Orlando, FL 32804

**Re: *St. Luke's et al. v. Ammon Bundy et al.*  
Violations of Permanent Injunction**

Dear Mr. Rodriguez:

As founder and creator of Freedom Man Press LLC (“Freedom Man”), you are on notice regarding Freedom Man’s continued violation of the Court’s Findings of Fact, Conclusions of Law and Order for Injunctive Relief, which was issued on August 25, 2023 (“August 25 Order”), and the Court’s Default Judgment Order, which was issued on August 29, 2023 (“August 29 Order”). The Court’s clerk served you, on behalf of Freedom Man, with these Orders on August 25 and August 29, respectfully. The Orders are enclosed.

In its orders, the Court directs Freedom Man to cease posting and disseminating specific statements, to remove unlawful content from the internet, and to deactivate unlawful links. *See* August 25 Order at 36-39; August 29 Order at 3-6.

Those orders state:

Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.

4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 25 Order at 37.

Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.
  - iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
  - iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
  - v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
  - vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
  - vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
  - viii. St. Luke's reported the parents to Child Protective Services.
  - ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
  - x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- xii. The family was discriminated against because the Infant was not vaccinated.
  - xiii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xiv. The parents did not consent to the medical treatment provided to the Infant.
  - xv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protesters' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
  - c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukeseExposed.com>,  
<https://www.facebook.com/SaveBabvCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),  
[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)
  - d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
  - e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukeseExposed.com>,  
<https://www.facebook.com/SaveBabvCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),  
[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)
  - f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 29 Order at 3-6.

The Court warned that failure to comply “may lead to contempt proceedings, sanctions and other legal ramifications.” August 25 Order at 37. Yet as of the date of this letter, Freedom Man has refused to comply.

Freedom Man’s unlawful conduct continues to cause daily, irreparable harm to my clients. It also harms our community and makes our communities less safe. *See* August 25 Order. Accordingly, my clients hereby demand that Freedom Man ceases and desists from its unlawful conduct, that Freedom Man remove the unlawful content from the internet, and that Freedom Man deactivate the links as mandated in the Court’s orders.

A non-exhaustive list of examples of Freedom Man’s unlawful content that must be removed and/or deactivated includes:

- All webpages that violate the Permanent Injunction order that begin with the <https://freedomman.org/cyrus/>
- <https://www.freedomman.org/video/government-subsidized-child-trafficking/>
- <https://www.freedomman.org/2022/my-response-to-the-idaho-statesman-st-lukes-lawsuit/>
- <https://www.freedomman.org/2023/judge-lynn-norton-and-erik-stidham-just-gag-ordered-me/>
- <https://www.freedomman.org/2023/facts-about-ammons-contempt-of-court-charge/>
- <https://www.freedomman.org/2023/judge-lynn-norton-just-intentionally-broke-the-law-proving-that-she-is-biased/>
- <https://www.freedomman.org/2023/idaho-department-of-health-and-welfare-is-the-bad-guy/>
- <https://www.freedomman.org/cyrus/archive/baby-cyrus-was-kidnapped-one-year-ago/>
- <https://www.freedomman.org/2023/diego-rodriguez-issues-challenge-to-st-lukes-and-erik-stidham/>
- <https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>
- <https://www.freedomman.org/2022/open-letter-meridian-police-ada-county-sheriff/>
- <https://stlukesexposed.com/> (all links and webpages from this website that violate the Permanent Injunction Order including, but not limited to, the following webpages and/or links embedded in the webpages: <https://stlukesexposed.com/truth-about-st-lukes/>, <https://stlukesexposed.com/lawsuit/>; <https://stlukesexposed.com/lawsuit/evidence-that-cps-agents-meridian-police-and-st-lukes-were-lying/>; <https://stlukesexposed.com/lawsuit/diego-answer-4th-amended-complaint/>; <https://stlukesexposed.com/lawsuit/judge-lynn-norton-violates-the-constitution-again/>; <https://stlukesexposed.com/lawsuit/judge-lynn-norton-judicial-misconduct/>, <https://stlukesexposed.com/lawsuit/erik-stidham-criminal-complaints/>; <https://stlukesexposed.com/lawsuit/summary-video/>).

Please comply with the Court's Permanent Injunction by September 22, 2023. If you do not, we will pursue all available legal remedies.

This cease-and-desist letter is sent without waiver of any right or remedy available at law or equity.

Sincerely,

*/s/Erik F. Stidham*

Erik F. Stidham  
Partner  
of Holland & Hart LLP

EFS:cmc  
Enclosures

30519500\_v1

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,

Plaintiff(s),

-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,

Defendant(s).

Case No. CV01-22-6789

FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER FOR PERMANENT  
INJUNCTIVE RELIEF FOR  
PLAINTIFFS

In Plaintiffs' Fourth Amended Complaint, Plaintiffs sought injunctive relief in addition to any damages awarded by the jury. The Defendants were allowed to participate in the jury trial on damages including jury selection, opening statements, cross-examination and closing arguments, but all Defendants failed to appear. After seven days of trial on the issue of damages, the jury awarded the Plaintiffs certain monetary relief on their claims. The equitable relief in the form of injunctive relief was not before the jury as injunctive relief is for the Court to decide.

Having reviewed the docket, the admitted facts in the Fourth Amended Complaint due to the Defendants' default in this lawsuit, and being informed by both the evidence presented in the trial on monetary damages as well as the jury's verdicts on the Special Verdict Form, the Court issues its Findings of Fact and Conclusions of Law on the request for permanent injunctive relief.

### **Findings of Fact**

These findings of fact are primarily based on the live testimony and exhibits presented at the jury trial on damages. The exhibits are extensive and set forth the specific "statements" of the Defendants through videos, internet postings, publications, etc. The statements speak for themselves as to who made or published the statement. The statements and publications are too numerous to repeat in this case, but each exhibit was testified to in Court and only the admitted exhibits were relied on by the Court.

The testimony on the underlying events as well as care of the C.A. (the "Infant") were relevant at trial to provide background and context regarding the conduct of the Defendants. These findings of fact are supported by the substantial and competent evidence provided by credible witnesses and exhibits admitted during the trial. The Court will generally refer to the nature of statements and the contents of the statements without citing all the exhibits to support each finding of fact. All exhibits admitted are part of the Court record in this matter.

1. The Plaintiffs brought this action in response to the Defendants' statements and publications made against the named Plaintiffs, the trespass that occurred on

St. Luke's<sup>1</sup> hospitals in Meridian and Boise. The events that started the interactions between Plaintiffs and Defendants centered on the medical care of the Infant.

2. Nurse Practitioner Nadia Kravchuk, the Infant's primary care provider (PCP) saw the ten month old Infant on or about March 1, 2022. The Infant was severely dehydrated and the parents said the baby was vomiting. The Infant had lost approximately 4 pounds since its six-month wellness visit. NP Kravchuk's office was unable to provide the necessary care and IV to rehydrate the Infant in her office. The parents were directed to the St. Luke's Boise Hospital emergency room where the Infant could be rehydrated.
3. The Emergency Room (ER) doctor on duty at St. Luke's determined not only was the Infant severely dehydrated, but the Infant was suffering from severe malnutrition. The ER doctor consulted with the Pediatric Hospitalist on duty, Dr. Erickson, who agreed the Infant should be admitted. Dr. Erickson agreed with the ER doctor's diagnosis of severe malnutrition and dehydration. Dr. Erickson testified the condition of the Infant was dire and without proper medical intervention, the Infant was at risk organ failure and possible death. This was NOT a healthy baby when it arrived at the hospital on March 1, 2022. The parents reported to Dr. Erickson that the Infant was doing well until about 7 months of age and then reoccurring vomiting started and such vomiting would continue for several days. *See*, Exhibit 1, page 12.
4. Dr. Erickson is Board-Certified in both General Pediatrics and Pediatrics Hospital Medicine. She a highly trained pediatric doctor. Dr. Erickson consulted with the parents regarding the condition of the Infant. The parents agreed to the care plan to rehydrate

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<sup>1</sup> The Court will prefer to Plaintiffs St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center Ltd. Collectively as "St. Luke's."

and increase caloric intake for the Infant recommended by Dr. Erickson. At no time did Dr. Erickson threaten the parents to call child support enforcement if the parents did not agree to the treatment plan.

5. The parents did not want the Infant vaccinated. No medical provider vaccinated the Infant and that preference of the parents was respected. There was testimony by Dr. Erickson and NP Jungman, the parents' decision not to vaccinate the Infant did not in any way impact the care plan for the Infant or the respect shown the parents.
6. Prior treatment medical records for the Infant's medical care since birth were not provided by the parents and could not be obtained by Dr. Erickson beyond NP Kravchuk's limited records. This led to some additional tests being run to rule out other potential causes for the Infant's condition. Dr. Erickson noted the Infant was failing to thrive.
7. With proper medical intervention and treatment, including IVs to rehydrate, bottle feedings as well as additional feedings through a nasogastric feeding tube (NG tube), the Infant's medical condition improved.
8. Dr. Erickson arranged for St. Luke's staff and social worker to assist parents apply for and receive Medicaid so there would be no out-of-pocket cost to the family for the Infant's care. The family had no medical bills that were not paid by Medicaid for the Infant's care.
9. Dr. Erickson also arranged for a home health nurse to come to the Infant's home to check on the progress of the child and to help with any further needs for the child and family members caring for the child. Dr. Erickson explained, and the parents seemed to understand, that continuing the additional caloric intake was critical as the feeding

plan being used prior to the hospitalization was insufficient to allow the Infant to grow and thrive. Regular weight check-ins were also critical for determining if the Infant was or was not continuing with gaining weight as he had done in the hospital. The parents were trained on how to complete additional feedings via the NG tube. The parents were also advised to continue breast-feeding the Infant in addition to the other necessary feedings.

10. On March 4, 2022, the Infant's medical condition had improved to where the Infant could be cared for at home and the Infant was released to the parents with discharge instructions and verbal commitments by the parents they would comply with the instructions and call if they had questions or needed any further assistance.
11. The parents did not follow the discharge instructions for care for the Infant. Nor would the parents allow the home health nurse to come to their home to check on the Infant on March 5, 2022 or March 6, 2022.
12. Finally, on March 7, 2022, the parents took the Infant to NP Dkystra (who was not a St. Luke's medical provider but who St. Luke's had connected the family with as he would be able to assist with the NG tube and NP Kravchuk indicated she was not able to provide that level of care for the Infant). At this appointment, the Infant's weight had dropped since it was released from the hospital. NP Dkystra advised the parents how to increase caloric intake and set another appointment for March 11, 2022 to check the Infant's weight.
13. On March 11, 2022, the parents missed bringing the Infant to the scheduled appointment.

14. On March 11, 2022, NP Aaron Dkystra (not any doctor, NP or staff member of St. Luke's) called Department of Health and Welfare Child Protection Services (CPS) regarding his concern about the Infant and requesting a check on the child to make sure the weight of the Infant was not continuing to drop and thus endangering the Infant's life. NP Dkystra had a statutory duty to report his concerns regarding medical neglect by the Infant's parents.
15. A Department of Health and Welfare (DHW) Safety Assessor was assigned to the case. She also made contact with NP Jungman and law enforcement who regularly assist with investigation and welfare checks on children.
16. Going into a weekend, the need to have the Infant's status checked became a greater concern for the Infant's well-being. The DHW Safety Assessor came to Ms. Jungman's office to discuss the referral regarding the Infant. NP Jungman reviewed limited medical records. The DHW Safety Assessor could not reach the Infant's parents. NP Jungman said she would stay at work to see the Infant if parents would bring the Infant in.
17. NP Jungman has been a nurse or nurse practitioner for over 24 years. She is highly skilled based on her studies and work experience. She specializes her practice in providing clinical care and evaluation of children. She has also been trained in and has extensive experience in CPS process.
18. On March 12, 2022, the parents called and indicated they would take the child to St. Luke's Children at Risk Evaluation Services (commonly referred to by its acronym CARES unit) for a weigh-in and wellness check at 4:00 p.m. The parents never arrived for the appointment.

19. Detective Fuller of the Meridian Police Department consulted with Nurse Practitioner Jungman at CARES about what to look for when they were able to put eyes on the Infant to determine if the Infant was or was not doing well. Detective Fuller is experienced at CPS investigations and is trained in the legal standard necessary to remove a child from his or her parents' care.
20. Law enforcement attempted contact with the parents to check on the Infant at the home address provided. Defendant Rodriguez answered the door and would not let law enforcement check on the child.
21. Later that evening, law enforcement was able to track parents down in a vehicle and initiated a traffic stop to investigate the CPS referral and check on the Infant's welfare.
22. Defendants had communicated with their followers and had a large number of persons arrive at the gas station where the traffic stop occurred.
23. With the Infant being held by its mother, Detective Fuller did a welfare check on the child. The NG tube was no longer in place. The Infant presented with symptoms and observations indicating it was not doing well and was in imminent danger. The Infant and his mother were taken to the ambulance.
24. In the ambulance, the Infant was removed from the mother due to Detective Fuller's determination the Infant was in imminent danger. Detective Fuller completed the paperwork to take the Infant into the custody of DHW and to get the Infant transported to the nearest ER.
25. The Emergency Medical Technicians at the scene determined the Infant was "medically stable to transport." "Medically stable to transport" status is not the same as a patient

being medically stable and healthy and in no need of further medical care. It is simply a determination it is safe to transport the patient in the ambulance to the hospital.

26. The Infant was transported to the closest hospital, St. Luke's Meridian hospital, by ambulance.

27. At the ER, Dr. Rachel Thomas examined the Infant. She is a Board-Certified Emergency Room doctor who also has extensive medical experience and training involving children, including treatment of malnutrition and dehydration. Dr. Thomas also determined the Infant was in imminent danger/harm and needed a higher level of care that could be provided at the St. Luke's Children's Hospital at the main St. Luke's hospital in Boise.

28. Even after a bottle feeding in the ER in which the Infant gulped down 6 ounces of formula, Dr. Thomas noted the Infant's weight was less than the weight when the Infant left the St. Luke's Children's Hospital on March 4, 2022. Dr. Thomas diagnosed the Infant with severe malnutrition and dehydration that could lead to death if not immediately addressed.

29. Dr. Thomas testified that the defamatory statements and postings about her by the Defendants have led to emotional stress such that she is taking a break from medicine and leaving the community with her family for an extended period of time. It is her hope she will be able to return and actively continue her medical career.

30. Defendant Bundy arrived at St. Luke's Meridian and with others blocked the ambulance bay from other ambulances being able to come to the hospital. Bundy was demanding release of the Infant even though he was not a family member or guardian of the Infant.

31. The protesters grew in number. The Meridian Police were called. The access doors to the ambulance bay were locked. Bundy was eventually trespassed from the private property of St. Luke's and was arrested along with another person engaged in the protests in the ambulance bay.
32. With active protesting occurring at the ER, Dr. Thomas consulted with hospital security and the Meridian Police Department and had the Infant safely transported to the Children's Hospital after determining the Infant was medically stable to be transported.
33. Dr. Thomas called Dr. Erickson and asked to have the Infant admitted. Dr. Erickson agreed to the admission and immediately went to the hospital to assist with the admission of the Infant to St. Luke's Children's Hospital and to begin further treatment.
34. Even though the Infant was in the custody of the DHW, St. Luke's medical professionals informed the parents of the care plan and the parents consented to all treatment provided by Dr. Erickson as well as by the other Pediatric Hospitalists caring for the Infant.
35. Dr. Erickson confirmed the Infant had in fact lost significant weight<sup>2</sup> since its release on March 5, 2022. Another NG tube was placed, and feedings and hydration began on the Infant.
36. Other Pediatric Hospitalists also provided care for the Infant when Dr. Erickson was not on duty.

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<sup>2</sup> It is important to note that while the amounts of weight loss or gain in this case may not "sound" significant, for the age and size of the Infant in this case and where the Infant was measured at being on the growth chart (in lower than 0.5% of all infants this age), the weight loss was significant and could lead to organ failure and death.

37. NP Jungman also consulted with the Pediatric Hospitalists and participated in the phone and in-person communications with the parents during the time the Infant was at the Children's Hospital. She also stayed involved in the care when the Infant was released to DHW's caregiver.
38. The parents were regularly updated by St. Luke's employees about the Infant's status and were allowed to visit and hold the Infant for approximately two hours at the hospital on or about March 13, 2022. Other visits and communications also occurred while the Infant was at the Children's Hospital.
39. While the Infant was being treated at the Children's Hospital, the Defendants Bundy and Rodriguez, in conjunction with multiple communications sent out by the other Defendants, organized protestors at St. Luke's Boise Hospital. The protests involved hundreds of people including people armed with weapons. Defendant Rodriguez made statements on March 14, 2022 that the Infant was being abused and mistreated by St. Luke's.
40. On March 12, 2022, the Defendants and followers of the Defendants were instructed by Bundy, Rodriguez and the websites or communications from People's Rights Network (PRN) and Freedom Man Press LLC to disrupt the operations of the St. Luke's by jamming the phone lines complaining and demanding the release of the Infant.
41. Bundy and Rodriguez would not leave the private property of St. Luke's when asked. Boise Police and Idaho State Troopers were brought in to maintain the security of the hospital.

42. Eventually, the threat of risk of harm to patients, patients' families, employees and a breach of the hospital became too great and the hospital was forced into lockdown and to close the hospital to new patients.
43. Armed protesters and followers of the Defendants attempted to enter the hospital even after it was locked down.
44. After it was discovered that the Infant had been removed from the hospital, the protesters moved their demonstrations to DHW offices.
45. The Infant was doing better and was discharged from St. Luke's on March 15, 2022 to DHW custody. The parents were allowed more and more time with the Infant by DHW as part of the safety/reunification plan.
46. Through intensive medical efforts, the Infant began gaining weight and his risk of imminent harm was eliminated. The Infant required ongoing monitoring to make sure it was continuing to gain weight and thrive. Additional calories were being given via the NG tube by the Infant's caregivers.
47. DHW stayed in regular communication with CARES and the parents regarding care of the Infant. NP Jungman along with the Medical Director of CARES evaluated the Infant 3-4 times and the Infant was gaining weight.
48. On March 18, 2022, the parents called DHW as the feeding tube had inadvertently come out while the parents had care of the Infant as part of DHW's safety/reunification plan. The parents did not want to go to hospital or have the Infant seen at their home. The parents requested NP Jungman reinstall the NG tube. DHW arranged a place and time to meet the parents away from protesters who were at the main DHW office. NP

Jungman reinstalled the NG tube in the Infant, following applicable standards of care for such a procedure.

49. NP Jungman and the CARES Medical Director evaluated the Infant again on March 23, 2022 with the parents present. The follow-up weight check showed the Infant was continuing to progress. The Infant was more interactive than at previous visits. Home health and PCP care was discussed again with parents.

50. Dr. Michael Whelan, a Board-Certified Pediatrician who works at St. Alphonsus, testified he concurred in the diagnosis and all of the care provided to the Infant. He confirmed based on the medical records that the Infant was in imminent danger based on its dehydration and malnutrition and the Infant was failing to thrive. He further opined that all care provided met the standard of care and there was no medical malpractice or misdiagnoses by any medical practitioner and specifically not by either of the named plaintiffs, Dr. Erickson and NP Jungman. He opined the NG tube was necessary and appropriate both times at the hospital. He opined the discharge instructions from St. Luke's were appropriate. He opined the re-installation of the NG tube by NP Jungman was within the standard of care and did not cause any infection or disease to the Infant as the placement of the tube was into a non-sterilized location of the body, the stomach. He opined the re-installation of the HG tube did not cause an infection in the Infant.

51. Dr. Whelan also opined the parents of the Infant were "medically neglectful" for not following through on discharge instructions and with follow up visits for weight checks to make sure feedings were providing the Infant with sufficient caloric intake. Dr.

Whelan opined he believed the parents knew the Infant had lost weight after first time Infant was released from hospital on March 4, 2022.

52. Dr. Whelan opined that, based on all the outside pressure by Defendants, St. Luke's, Dr. Erickson and NP Jungman performed very well and there was no evidence that the Infant was not improving while in the care of St. Luke's.

53. Based on the testimony of Kyle Bringhurst, the Ada County Deputy Prosecutor who handled the Infant's case and has 8-9 years of experience involving CPS cases, the CPS proceedings and requisite findings for placement into DHW custody occurred as required by statute. A shelter hearing was held on March 15, 2022 and a mandatory adjudicative hearing was set. A Notice of Dismissal by the State was filed on or about May 4, 2022, so the adjudicatory hearing set for May was vacated. The Infant was returned to the custody of the parents with a safety plan.

54. David Jeppesen, Director of the Department of Health and Welfare, also testified the CPS process is defined by statute and was followed in this case. The courts, not the DHW, decide if a child is allowed to return to his or her parents. The goal is to reunite children with their parents and this goal in Idaho is achieved in about 65% of the CPS cases (which is much higher than the national average).

55. Director Jeppesen also testified the DHW does not get "extra money" for placing a child in the care of DHW per the CPS statute. The legislature sets the budget for the DHW and there is no increase in monies to the DHW for children taken into temporary custody under the CPS. Director Jeppesen also testified that allegations of child trafficking or kidnapping are untrue. While there are some adoptions of children whose parents are not fit to raise them, this is in accordance with Idaho's statutes and court

approval is required for all such adoptions. Finally, such adoptions do not happen frequently and there is no preference for persons of a particular sexual orientation as alleged by Defendants.

56. Immediately after the CPS referral was made and the Infant was removed from the parents, the Defendants Bundy and Rodriguez, through their own statements, video postings, communications with their followers and their internet postings on the websites of the other Defendants: Peoples Rights Network (PRN), Freedom Man Press, LLC and Ammon Bundy for Governor -- which Bundy and/or Rodriguez controlled-- began doxxing<sup>3</sup> and intimidating the Plaintiffs, other medical providers as well as anyone involved in the CPS matter (including but not limited to law enforcement, the prosecuting attorney, the judge handling the confidential CPS court proceedings, and the Safety Assessor for DHW).
57. Defendants' statements were intended to damage the reputations of the Plaintiffs; invade the privacy of Mr. Roth, Dr. Erickson, and NP Jungman; to shut down St. Luke's Hospital; and to threaten harm to those involved in the CPS case involving the Infant.
58. Defendants Bundy and Rodriguez are actively involved in and are spokespersons for PRN. Defendant Rodriguez controls and authors many of the statements posted on Defendant Freedom Man Press, LLC's website, which published Bundy and Rodriguez's defamatory statements on the internet and on other extremist media outlets. Bundy and Rodriguez hold themselves out to be anti-government activists motivated by certain religious beliefs. Bundy encourages militia-style training for his

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<sup>3</sup> Doxxing includes publicly identifying or publishing private information about a person as a form of punishment or revenge.

followers. He urges his followers to take action outside the law to protect their rights. Defendants Bundy and Rodriguez, PRN and Freedom Man Press, LLC are willing to encourage others to join them in using violence to reach their objectives and to harass public employees such as law enforcement, DHW employees, CPS prosecutors, and judges.

59. Bundy and Rodriguez used the tactic of “public shaming” through false and defamatory narratives to intimidate and defame the Plaintiffs. This included but was not limited to accusing the Plaintiffs to be involved in kidnapping, child trafficking, child abduction, abusing children, and stealing children for money and pedophilia. This intimidation also included releasing private information about Mr. Roth, Dr. Erickson and NP Jungman which put these Plaintiffs and their families at risk of harm as testified to at trial.
60. PRN was a supporter of Ammon Bundy for Governor, and the events in this case were the topic of Bundy at political gatherings, and defamatory statements about Plaintiffs were made by Bundy at his political events and made for the indirect purpose of raising campaign contributions.
61. Spencer Forby, an expert on extremist organizations as well as a highly trained law enforcement officer and instructor on de-escalating situations, crowd control and SWAT techniques, opined that Defendants Bundy, Rodriguez, PRN and Freedom Man Press, LLC, used their defamatory statements and disinformation rhetoric to trigger their followers to a call for action based on false premises, which then led to Defendants Bundy and Rodriguez creating conspiracy theories of heinous criminal allegations by Plaintiffs without any factual basis. In order to maximize the involvement of the

Defendants' followers, there was a strategic coordination of the false and defamatory messages being repeated over websites controlled by Defendants and shared with other extremist media outlets.

62. Defendants' followers then quickly joined the protest at the hospital and the efforts outside Idaho to disrupt the business of St. Luke's by flooding the phone lines. The false and defamatory statements of Bundy and Rodriguez were then used by followers and the Defendants to harass and intimidate the Plaintiffs via verbal, in-person and online threats.

63. Bundy directed his followers to be ready to "fight it out on the street." Bundy and Rodriguez created a false and defamatory conspiracy theory against the Plaintiffs and repeated it over and over again in an effort to have St. Luke's put out of business and the medical providers to lose their jobs. The Plaintiffs testified they believed the statements presented real threats of violence to them personally as well as their families. Plaintiffs testified as to the specific steps they took as a result of the intimidation and defamatory statements to protect themselves and their family members. Plaintiffs also testified to having to daily track the social media of all the Defendants to weigh and prepare for threatened harm.

64. According to Jessica Flynn, an expert on reputational harm, and Beth Toal, St. Luke's Vice President for Communications, Bundy's and Rodriguez's tactics are deliberate and intentional. Their marketing techniques and use of social media have the effect of disseminating knowingly defamatory information and disinformation to radicalize their followers and at the same time get media coverage of their actions and raise monies for their organizations based on their defamatory statements. The Defendants wanted their

messages to go viral as well as deep and wide, and to have lasting effects. The Defendants wanted their social media attack and protests to prevent St. Luke's from providing services to others. The Defendants also created a clear connection in their social media for contributions to support their conduct. The media recognition gained by the Defendants through their disinformation and defamatory statements is intended to raise their individual profiles as well as their organizations' profiles.

65. The extremist and marketing experts testified the Defendants also used the Infant being taken into CPS custody to increase their own visibility on the internet and in the community as well as to raise money for themselves through the organizations they controlled. This conduct continues to the present and it is not expected to stop as it is a source of fundraising for Bundy's and Rodriguez's organizations.
66. Defendants Bundy and Rodriguez organized and promoted the protests at St. Luke's. These protests involved armed individuals, which is consistent with Bundy's involvement in prior protests and his statements/trainings of his followers about the use of force. The experts testified that the militia training promoted and offered by PRN creates a threat and possible risk of physical harm.
67. On the advice of law enforcement, who indicated they could not restrain the number of protesters (estimated to be 400 persons), St. Luke's was forced to lock down the entire downtown campus and to redirect patients to other facilities.
68. The lockdown also prevented families from entering the hospital to see their loved ones, prevented third parties from seeking care or attending a scheduled appointment at the Boise campus, and prevented employees from coming or leaving their shifts.

69. St. Luke's Chief Financial Officer as well as Dennis Reinstien, CPA, testified that economically St. Luke's lost significant revenue from cancelled treatment or appointments. St. Luke's also incurred additional security costs during the protests and had to increase the number of individuals involved in security at all of its facilities to be prepared for future protests organized by the Defendants.
70. The Defendants knew or reasonably should have known the statements they were making were false and defamatory. Defendant Rodriguez is the grandfather of the Infant and the medical records provided to his daughter (mother of the Infant) easily could have been reviewed by him. Instead, he made false and defamatory statements regarding the health of the Infant, the actual medical care diagnoses and the care provided.
71. Rodriguez also claimed without any legal statutory support that the actions of the CPS were unlawful and was involved with a marketing plan for donations for the Infant and its family, as well as to monetize his and Bundy's organizations.
72. No evidence was presented that any of the Defendants have medical training, knowledge or education to support their false and defamatory statements regarding the Infant's health status and the need for medical care.
73. The intentional, materially false and malicious defamatory statements by the Defendants include, but are not limited to, the following:
- a. The Infant was perfectly healthy when taken by CPS.
  - b. St. Luke's made the Infant sick and infected the Infant with disease.
  - c. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.

- d. St. Luke's, St. Luke's management, law enforcement, DHW, the courts, and the medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- e. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- f. DHW makes more money for every child it takes into CPS custody and that is why the DHW kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- g. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- h. St. Luke's reported the parents to CPS.
- i. Dr. Erickson threatened to file a report with CPS if the parents did not agree to the treatment plan between March 1-4, 2022.
- j. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
- k. The family was discriminated against because the Infant was unvaccinated.
- l. The parents have thousands of dollars of medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
- m. The parents did not consent to the medical treatment provided to the Infant.

n. The Infant was released from the Children's Hospital and returned to directly to the family due to *the protesters'* or Defendants', actions.<sup>4</sup>

74. These false statements were repeated again and again by Defendants, including using links to the statements on other websites and video recordings. "Wanted" posters were made for Mr. Roth, Dr. Erickson and NP Jungman (as well as others involved who were doxxed) and posted on the internet as well as distributed at the protests at the St. Luke's Boise campus. The Plaintiffs and others involved in the events were repeatedly threatened by Defendants' actions of encouraging their followers to take action into their own hands and disclosing personal information about Mr. Roth, Dr. Erickson and NP Jungman. Phone messages to St. Luke's from followers across the county repeated the false and defamatory statements of Bundy and Rodriguez.

75. St. Luke's senior management officers testified it is now more difficult to recruit doctors and other medical providers to Idaho due to the events surrounding the Infant and the Defendants' harassment and defamatory statements towards St. Luke's and its employees.

76. The defamatory statements by the Defendants were completely unfounded, false, made intentionally, and maliciously harmed the reputations of the Plaintiffs and others who were doxxed. These false statements invaded the privacy of Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman by portraying them in a false light as persons who harm children. The defamatory statements and conduct of the Defendants intentionally inflicted emotional distress on Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman as

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<sup>4</sup> The Infant was returned to its parents by the Court through the dismissal of the CPS case, not the actions of Defendants.

well as other parties who were doxxed and threatened. Mr. Roth, Dr. Erickson and NP Jungman all presented substantial and credible evidence of the actual harm they (and their families) suffered due to Defendants' defamatory statements, invasion of privacy and intentional infliction of emotional distress upon Plaintiffs by attacking their professional reputations.

77. Experts Devin Burghart, Spencer Fomby, and Jessica Flynn all testified that once on the internet, it is difficult to remove defamatory statements from the internet. In this case, the Defendants took steps to regularly re-post prior videos and postings and to create links to the false statements on the website of other media sources, thereby knowingly increasing the viewers of the published defamatory statements. The original posts as well as present statements continue on the Internet such as when Bundy or Rodriguez are quoted with links to other websites about this litigation. See Idaho Dispatch quotes and postings in the Declaration of Jennifer Jensen in support of the requested injunctive relief.
78. The extremist organization experts testified the defamatory statements are re-posted by the Defendants in order to keep them in the news and to generate new followers and more donations.
79. C.P. "Abby" Abbodandolo, Senior Director of Security for St. Luke's, who has extensive hospital security and law enforcement experience, testified he was shocked how quickly the Defendants could mobilize their followers to protest, make signs, and come armed and ready to take action. He also testified the Defendants and their followers create an ongoing threat to St. Luke's operations throughout the state.

80. The DHW Safety Assessor left DHW employment and moved out of state due to the doxxing. Dr. Thomas testified she is leaving and moving from the state for a period of time in hopes that she can safely return to practice medicine. Employees left St. Luke's employment due to the protesting and intimidation. Dr. Erickson has considered leaving a job she loves due to the ongoing emotional distress and intimidation of the Defendants. NP Jungman has suffered and continues to suffer from emotional distress, and the intimidation affects how she interacts with parents of other patients.

81. The extremist group experts Burghart, Fomby, and Flynn described both Bundy and Rodriquez as an anti-government activists, conflict disrupters, and disrupter entrepreneurs. Their business model is to raise money for themselves or the organizations they control from followers based on false, fraudulent and defamatory statements. The Defendants have used disinformation (misinformation that is intentionally spread) to harm Plaintiffs.

82. Dr. Camille LaCroix, Forensic Psychiatrist, testified as to the continuing emotional distress to Dr. Erickson and NP Jungman, and that this is not likely to go away and gets worse every time there is a new or a re-posting of a defamatory statement, an article or threat against them personally. Dr. Erickson's husband testified as to the need to continually monitor social media postings to make sure his wife and family are safe. According to Dr. LaCroix, Dr. Erickson and NP Jungman can be triggered and suffer more emotional distress by the re-posting of defamatory statements and invasions of their privacy that cause them to change how they treat others and how they protect their families.

83. Dr. Erickson and NP Jungman each testified that defamatory statements, harassment and intimidation as a result of Defendants' actions affects their life every day professional and in their personal relationships. Both testified as to the constant fear they have due to Defendants defamatory attacks in the newspapers, on tv, and on the internet.

84. The evidence provided at the jury trial was substantial and competent evidence that established the claims of defamation, invasion of privacy and intentional infliction of emotional distress due to the Defendants' conduct. These claims were satisfied by the applicable burden of proofs of preponderance and clear and convincing evidence.

85. As to the defamation claims, the Court finds:

- a. The Defendants communicated information concerning the Plaintiffs to others;
- b. The information impugned the honesty, integrity, virtue or reputation of the Plaintiffs or exposed the Plaintiffs to public hatred, contempt or ridicule;
- c. The information was false;
- d. The Defendants knew it was false or reasonably should have known that it was false; and
- e. Plaintiffs suffered injury caused to the defamation.

86. As to the Invasion of Privacy claims, the Court finds:

- a. The Defendants placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye by publicly disclosing some falsity or fiction concerning Mr. Roth, Dr. Erickson, and NP Jungman.
- b. A disclosure of some falsity or fiction means that a publication or publications by

Defendants were materially false.

- c. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman suffered injury caused by the false light invasion of their privacy.

87. As to the Intentional Infliction of Emotional Distress claims, the Court finds:

- a. Defendants engaged in intentional or reckless conduct;
- b. That was extreme and outrageous;
- c. Causing severe emotional distress to Mr. Roth, Dr. Erickson, and NP Jungman;  
and
- d. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman were injured and the emotional distress was proximately caused by Defendants' conduct.

88. The Defendants' defamatory statements including allegations of conspiracy by the Plaintiffs, law enforcement, the courts and DHW to engage in criminal conduct against children is not supported by any evidence.

89. The false and defamatory statements were made as part of a tactical and sustained marketing campaign to defame and smear the reputations of the Plaintiffs, incite unlawful conduct by Defendants' followers, create a fear of future physical harm to Plaintiffs, and to create an incentive for followers to make donations to Defendants or organizations they controlled.

90. The Defendants actions in this case, as well as the fact that they refuse to stop making defamatory statements, repeat past defamatory statements, presents a continuing threat of actual irreparable harm to Plaintiffs. The continuing threat has led to St. Luke's increasing its security at each of its hospitals. The named Plaintiffs continue to be the subject of threats by Defendants or their followers. The threats include but are not

limited to personal, professional or family member harm through Defendants internet presence and re-posting of prior defamatory statements. A prior Protection Order by the Court has failed to deter Defendants from making knowingly false and defamatory statements and repeating such statements.

### **Conclusions of Law**

The Court requested supplemental legal support for Plaintiffs position they are entitled to equitable relief in the form a permanent injunction. Plaintiffs file a memorandum and supplemental brief and declaration in support of the request injunctive relief. In the Declaration of Jennifer M. Jensen, she indicates the Idaho Dispatch (which is not a party to this lawsuit) continues to post Defendant Rodriguez's and Bundy's defamatory statements about the Plaintiffs and counsel involved in this case on the internet even after the jury trial on damages has ended. Defendant Rodriguez filed an "Answer to Request for Permanent Injunctive Relief."<sup>5</sup> The Court has considered the findings of fact and the entire court record including Rodriguez's filings in making its ruling on injunctive relief.

#### **1. Whether or not to grant permanent injunctive relief is within the discretion of the trial court.**

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<sup>5</sup> Defendant Rodriguez claims in part there has never been an evidence-based trial as to whether or not the things he said were true and he believes all his statements were true. The Court notes the jury trial was evidence-based (with testimony and admitted exhibits), but Defendant Rodriguez elected not to attend and cross examine witnesses or challenge the admissibility of evidence. Defendant Rodriguez also claims injunctive relief is a violation of his First Amendment rights. For the reasons discussed in this Findings of Fact and Conclusions of Law, the Court finds injunctive relief is allowed as a matter of law and appropriate in this case.

In *Gem State Roofing, Incorporated v. United Components, Incorporated*, 168 Idaho 820, 828, 488 P.3d 488, 496 (2021), the Idaho Supreme Court held “The granting or refusal of an injunction is a matter resting largely in the trial court’s discretion.” (citing *Higginson v. Westergard*, 100 Idaho 687, 689, 604 P.2d 51, 53 (1979)). In applying its discretion, this Court must: (1) correctly perceive the issue as one of discretion; (2) act within the outer boundaries of its discretion; (3) act consistently with the legal standards applicable to the specific choices available to it; and (4) reach its decision by the exercise of reason. *Lunneborg v. My Fun Life*, 163 Idaho 856, 863, 421 P.3d 187, 194 (2018). The Supreme Court in *Gem State Roofing* went on to discuss the different standards for preliminary versus permanent injunctions:

As an initial observation, UCI's reliance on the standard for a *preliminary* injunction is inapposite. Rule 65(e) enumerates five grounds for entry of a preliminary injunction. A preliminary injunction is a temporary injunction effective for the pendency of the litigation before the merits of the case are decided. I.R.C.P. 65(e). Preliminary injunctions are designed to protect clearly established rights from imminent or continuous violation during litigation. See *Gordon v. U.S. Bank Nat'l Ass'n*, 166 Idaho 105, 455 P.3d 374, 384 (2019) (quoting *Brady v. City of Homedale*, 130 Idaho 569, 572, 944 P.2d 704, 707 (1997)) (“A district court should grant a preliminary injunction ‘only in extreme cases where the right is very clear and it appears that irreparable injury will flow from its refusal.’”). A permanent injunction, on the other hand, is entered at the resolution of the case, and requires a showing of threatened or actual irreparable injury; in addition, in order to deny a permanent injunction the trial court must be persuaded that there is “no reasonable expectation that the wrong will be repeated.” *O'Boskey*, 112 Idaho at 1007, 739 P.2d at 306. In other words, a trial court may appropriately deny a preliminary injunction at the outset of a case when there are complex issues of fact and law yet to resolve, but correctly grant a permanent injunction once those issues have been resolved in favor of the plaintiff.

*Gem State Roofing*, 168 Idaho 820, 834–35, 488 P.3d 488, 502–03 (2021).

In this case, the Court finds based on the Findings of Fact and the Declaration of Jennifer Jensen, the Plaintiffs have established by substantial and competent evidence of threatened or

actual irreparable damage as well as a reasonable expectation that the wrong will be repeated by the Defendants if permanent injunctive relief is not granted. The jury's monetary damages, if able to be collected, are inadequate to protect Plaintiffs from continued and ongoing injuries to their reputations, privacy, emotional health, ability to practice their chosen professions and reside in the community without fear, and to allow the community to trust that St. Luke's hospital system is not in any way engaged in heinous criminal conduct towards its patients. Balancing the hardships between Plaintiffs and Defendants' alleged chilling of their freedom of speech rights, the balance tips in favor of Plaintiffs. A remedy in equity is warranted as defamatory speech is not protected free speech. Finally, the public interest would not be disserved by a permanent injunction of the scope outlined in this decision. The permanent injunctive relief is appropriate to eliminate the ongoing irreparable threatened and actual harm to all Plaintiffs.

**2. Defendants' defamatory statements are not protected speech under the First Amendment.**

The United States is a republic founded on the doctrine of the rule of law. What that means is all persons are expected to follow the laws adopted through our representational form of government. It also means all persons, no matter their status, wealth or beliefs must follow the rule of law.

The First Amendment to the United States Constitution provides:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press or the right of the people to peacefully assemble, and to petition the Government for a redress of grievances.

However, these rights are not absolute. Every right under the Constitution is subject to limits, and a person or entity cannot make or publish knowingly false statements that intentionally cause reputational or other damage to another and then hide behind the First Amendment as a shield. The

United States Supreme Court has recognized categories of speech that the government can regulate because of the content of the speech, as long as the government does so evenhandedly. *See R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992) (categories of speech that are limited: obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, and child pornography). In *R.A.V.* the Court stated:

The First Amendment generally prevents government from proscribing speech, *see, e.g., Cantwell v. Connecticut*, 310 U.S. 296, 309–311, 60 S.Ct. 900, 905–906, 84 L.Ed. 1213 (1940), or even expressive conduct, *see, e.g., Texas v. Johnson*, 491 U.S. 397, 406, 109 S.Ct. 2533, 2540, 105 L.Ed.2d 342 (1989), because of disapproval of the ideas expressed. Content-based regulations are presumptively invalid. *Simon & Schuster, Inc. v. Members of N.Y. State Crime Victims Bd.*, 502 U.S. 105, 115, 112 S.Ct. 501, 508, 116 L.Ed.2d 476 (1991) *id.*, at 124, 112 S.Ct., at 512–513 (KENNEDY, J., concurring in judgment); *Consolidated Edison Co. of N.Y. v. Public Serv. Comm'n of N.Y.*, 447 U.S. 530, 536, 100 S.Ct. 2326, 2332–2333, 65 L.Ed.2d 319 (1980); *Police Dept. of Chicago v. Mosley*, 408 U.S. 92, 95, 92 S.Ct. 2286, 2289–2290, 33 L.Ed.2d 212 (1972). From 1791 to the present, however, our society, like other free but civilized societies, has permitted restrictions upon the content of speech in a few limited areas, which are “of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality.” *Chaplinsky, supra*, 315 U.S., at 572, 62 S.Ct. at 762. We have recognized that “the freedom of speech” referred to by the First Amendment does not include a freedom to disregard these traditional limitations. *See, e.g., Roth v. United States*, 354 U.S. 476, 77 S.Ct. 1304, 1 L.Ed.2d 1498 (1957) (obscenity); *Beauharnais v. Illinois*, 343 U.S. 250, 72 S.Ct. 725, 96 L.Ed. 919 (1952) (defamation); *Chaplinsky v. New Hampshire, supra* (“ ‘fighting’ words”); *see generally Simon & Schuster, supra*, 502 U.S., at 124, 112 S.Ct., at 513–514 (KENNEDY, J., concurring in judgment). Our decisions since the 1960's have narrowed the scope of the traditional categorical exceptions for defamation, *see New York Times Co. v. Sullivan*, 376 U.S. 254, 84 S.Ct. 710, 11 L.Ed.2d 686 (1964); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974); *see generally Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 13–17, 110 S.Ct. 2695, 2702–2705, 111 L.Ed.2d 1 (1990), and for obscenity, *see Miller v. California*, 413 U.S. 15, 93 S.Ct. 2607, 37 L.Ed.2d 419 (1973), but a limited categorical approach has remained an important part of our First Amendment jurisprudence.

We have sometimes said that these categories of expression are “not within the area of constitutionally protected speech,” *Roth, supra*, 354 U.S., at 483, 77 S.Ct., at 1308; *Beauharnais, supra*, 343 U.S., at 266, 72 S.Ct., at 735; *Chaplinsky, supra*, 315 U.S., at 571–572, 62 S.Ct., at 768–769; or that the “protection of the First Amendment does not extend” to them, *Bose Corp. v. Consumers Union of United*

*States, Inc.*, 466 U.S. 485, 504, 104 S.Ct. 1949, 1961, 80 L.Ed.2d 502 (1984); *Sable Communications of Cal., Inc. v. FCC*, 492 U.S. 115, 124, 109 S.Ct. 2829, 2835, 106 L.Ed.2d 93 (1989).

*R.A.V. v. City of St. Paul*, 505 U.S. 377, 382–83 (1992).

Stated another way, defamation is a limit on both freedom of speech and freedom of the press. A person or entity cannot say “I believed what I was saying was true” when the undisputed facts establish those “truths” were known to be false or should have been known to be false by the Defendants and they were spoken with the specific intent to threaten or cause harm to the other person or entity.

The defamatory statements made by Defendants here were not just disagreements with the manner in which the CPS laws are enforced. Instead, the defamatory statements by Defendants were made intentionally to get others to believe “as true” that Plaintiffs and anyone else involved in the CPS investigation and court proceedings or medical treatment of the Infant were committing heinous acts against the Infant, and that St. Luke’s and the other Plaintiffs were “wicked” and “evil” persons such that they should be removed from their professions and the hospital shut down from providing all medical care to anyone in our community. There is no evidence (only baseless allegations by Defendants) of any such conduct by the Plaintiffs or any other party involved in the CPS case involving the Infant. In a court of law, the party claiming truth as a defense must present evidence of truth, and Defendants did not do so.

Here, the Defendants’ statements in every possible form were intentional and with reckless disregard for the truth, fraudulent, malicious and defamatory. As the jury instructions explained, defamation is the injury to one's reputation either by written expression, which is libel, or by oral expression, which is slander. The law is well-established that speech which is defamatory and causes harm is not protected by the First Amendment. As indicated in the above quote from the

Supreme Court, defamation in our common law existed prior to the founding of this country and has been recognized since 1791 by our courts. Further, the mere fact that religious beliefs are cited as motivation for the Defendants' actions does prevent the statements from being defamatory or illegal invasions of another's right to privacy.<sup>6</sup> Nor does the cloak of the Defendants' religious beliefs that the Plaintiffs were "wicked" allow First Amendment protection to the statements such that the statements cannot also be defamatory.

Additionally, the United States Supreme Court recently reaffirmed fraudulent statements made to encourage or induce illegal immigration for financial gain are not protected speech under the First Amendment. *See United States v. Hansen*, 2023 WL 4138994, \_\_\_ U. S. \_\_\_, 143 S.Ct. 1932 (2023). "Speech intended to bring about a particular unlawful act has no social value; therefore, it is unprotected." *Williams*, 553 U.S. at 298, 128 S.Ct. 1830." *Id.* at 1947 (2023). Defendants' conduct in this case included false, fraudulent and defamatory statements made in part for their own financial gain and such speech is not protected. People are free to give money to whatever organizations or persons they want, but they should be informed if the statements to support such donations of monies are not true.

Finally, simply saying a statement over and over does *not* make it true. It is well-established law that a person can tell certain lies and those lies are protected by the First Amendment. *See United States v. Alvarez*, 567 U.S. 709 (2012) where an individual was being criminally prosecuted for falsely claiming to have received a military medal of honor pursuant to the Stolen Valor Act was a content-based restriction on free speech. The difference here is that Defendants' statements were not lies about themselves; they were false, intentional and defamatory statements about others which were intended to hurt Plaintiffs' reputations or businesses. No reasonable person would

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<sup>6</sup> Indeed, the Court cannot to find any religious support for bearing false witness against another.

think these statements were meant for any other purpose than to harm the reputations and to threaten the persons being attacked by such statements. Such statements are not protected speech under the First Amendment.

Listening to and watching the videos of the Defendants and the published written statements of the Defendants Bundy and Rodriguez that claim their belief that “they” had the individual “right” to take the Infant (who is not even their child) back by violence if necessary is a profound misstatement and misunderstanding of the rule of law. In reality, it is a cry for “vigilante justice” which is the act of enforcing the law without legal authority to do so. Vigilante justice does not involve due process and allows one person to be the lawmaker, the law enforcer, the judge and jury without any investigation into the truth. Vigilante justice is not a “right” an individual or group of individuals have in this country.

Laws are passed by duly elected persons through a legislative process involving two representational governmental bodies and then also approved by the executive officer (the President of the United States or the Governor of a state). Laws are enforced by law enforcement officers in the executive branch of government. Challenges to the laws as being facially unconstitutional or unconstitutional as applied are for the judicial branch to decide.

Vigilante justice is not tolerated under the Constitution because it violates the rights of the accused. Vigilante justice expounded by the Defendants is meant to control others not by the rule of law, but by intimidation through threats of violence and the public shaming of others. Defendants clearly believe they are above the law and can operate outside the boundaries of our laws if they disagree with how the laws are being applied. That is not how our government works. A party can appeal a court’s ruling and seek appellate review of a decision. The manner in which

to challenge any court's ruling is not through threat and intimidation. It is through the judicial process.

Moreover, if Defendants want the CPS statutes to be revised or changed, then they can lobby the legislature. While it is unclear exactly what changes to the law the Defendants seek, they are free to propose changes by working directly with legislators to sponsors bills. The Idaho Legislature has a long history of protecting children through the DHW, and nothing in this trial established the procedure approved by the Legislature was not followed or was misapplied based on the true health status of the Infant and the failure of the parents to allow the Infant to be seen for follow-up care. In fact, this case is an example of the CPS system working exactly as intended by the Legislature to protect the well-being of a child.

In several of the published statements by Defendants Bundy and Rodriguez they encouraged their followers to "follow the money" to prove how children are being harmed, trafficked, or kidnapped by CPS. No actual evidence was cited for this proposition by the Defendants and it was proven to be false at trial. Instead, the evidence in this case shows the only money being "made" by the events involving the Infant were St. Luke's and other medical practitioners receiving Medicaid reimbursement for the medical services provided (which was testified to be 70% of the actual cost of the care) and money flowing from donations by Defendants' followers (based on false defamatory statements about the Plaintiffs and others) to Defendants Bundy, Ammon Bundy for Governor, Rodriguez, People's Rights Network, Freedom Man Press LLC and Freedom Man PAC.

If Defendants wanted to present a defense of the "truth" of their statements, they could have participated in this lawsuit or at least the damages trial. They did not. The Court must take the undisputed facts presented at trial as true. Moreover, independent expert medical testimony as

well as common sense establishes the facts were not as Defendants maintained. The actual numerous weights taken of the Infant as well as the results of other medical tests and the pictures of the Infant did not present a healthy infant. Dr. Wheaton testified there was no misdiagnosis or malpractice by the medical providers.

The Court finds St. Luke's did not initiate nor threaten to initiate CPS action. Did St. Luke's become involved after the Infant was taken into the custody of DHW? Yes. However, no child was "kidnapped" by the police or doctors. No child was "trafficked" or abused by DHW, the hospital, the doctors or the courts. Instead, St. Luke's through its staff and medical providers provided the *necessary* medical care the Infant needed (twice) and took care to receive the parents' consent for the care provided even though during the second hospitalization was when the Infant was in the temporary care and custody of DHW. All of the Infant's medical care was covered by Medicaid insurance.

Dr. Whelan testified the need for CPS to get involved was due to the parents' failure to attend follow-up appointments. In making this last statement, the Court does not in any way believe the parents intended to harm the Infant. But the parents did neglect the medically needed follow-up appointments to make sure the Infant was gaining, not losing, weight. New parents have a plan for how they want to care for their child and they are allowed great freedom in implementing their plan, until and unless the child's welfare is at risk. At that point, the DHW has a duty to step in, to get the child the care it needs and then to develop a reunification plan so the child can return to its home and thrive.

### **3. Permanent injunctive relief is appropriate in this case.**

Permanent injunctive relief requiring the Defendants to stop making defamatory statements about the Plaintiffs, to remove defamatory and harassing statements or posts from online locations under the Defendants' control and prohibiting the Defendants from republishing the statements or posts is appropriate in this case. The statements, internet posts, online interviews made as part of a sustained campaign of defamation by Defendants and they continue to threaten or cause actual irreparable harm to the Plaintiffs. Based on the testimony of Mr. Roth, Dr. Erickson, NP Jungman, this conduct not only affects the individual Plaintiffs, but it also affects their families, their co-workers, their work environments. It also continues to negatively impact the reputation of St. Luke's in the community. The Court has no expectation that the defamatory statements will stop by Defendants without a permanent injunction.

This type of conduct can be enjoined by a court. While the Court could not find any on-point Idaho authority for the factual circumstances presented in this case, the Court can look to other jurisdictions for persuasive authority for internet smear campaigns. *See, e.g., Balboa Island Vill. Inn, Inc. v. Lemen*, 40 Cal. 4th 1141, 1155-57 (2007) (holding that the court may issue an injunction prohibiting the defendant from repeating statements judicially determined to be defamatory and rejecting argument that damages are the only remedy for defamation because otherwise the plaintiff would be required to bring a succession of lawsuits for damages which could be insufficient to deter the continuing tortious behavior); *Advanced Training Sys. v. Caswell Equip. Co.*, 352 N.W. 2d 1, 11 (Minn. 1984) (affirming permanent injunctive relief prohibiting republication of material found libelous at trial); *Weitsman v. Levesque*, Case No. 19-CV-461 JLS (AHG), 2020 WL 6825687, (S.D. Cal. Nov. 20, 2020) (applying New York law and collecting New York cases that removal orders are

necessary when parties refuse to depublish); *see also St. James Healthcare v. Cole*, 178 P.3d 696, (Mont. 2008) (affirming in part preliminary injunction against harassing and threatening statements).<sup>7</sup>

In *Weitsman*, the court ordered permanent injunctive relief when the defendant engaged in a “sustained Internet defamation campaign” falsely accusing the plaintiff of child trafficking. *Weitsman*, 2020 WL 6825687. The court entered default against the defendant, and the plaintiff obtained an award of compensatory and punitive damages. *Id.* The defendant had continued making the defamatory statements online, despite the litigation and an arrest warrant. *Id.* A permanent injunction was appropriate due to the intentional, sustained campaign of defamation aimed to injure the plaintiff’s interests, including business interests. *See id.* The injunction was tailored to (1) require the removal of statements held to be defamatory whose postings online were under the defendant’s control; and (2) prohibit the republication of statements held to be defamatory. *See id.*

The Defendants’ actions attacking Plaintiffs in this case were relentless for over a year and with the specific intent to harm the reputations of St. Luke’s and the other named Plaintiffs who did their job to ensure the Infant received necessary medical care. The Defendants continue to the present time in making defamatory statements to others about the Plaintiffs. There is every indication based on the Defendants’ conduct over the prior year that the Defendants will continue to repeat and re-post the defamatory statements if no injunction is entered. The Court recognizes the Defendants have the means to influence thousands of followers, as they quickly organized protestors at the hospitals and across the country to disrupt St. Luke’s business. This ability to mobilize others and to condone violence makes the threatened irreparable harm even more likely.

As several experts testified at trial, that once on the internet, it is difficult to remove defamatory statements from the internet, a simple retraction is inadequate relief for the Plaintiffs. Plaintiffs are entitled by law to have all the Defendants do everything in their power and on all

sites under their control (directly or indirectly) to remove all the judicially determined defamatory statements about the Plaintiffs. Moreover, the Defendants are ordered to stop making new or repeating previously made statements or postings with defamatory statements about the Plaintiffs. Further defamatory statements or invasion of Plaintiffs' privacy regarding the events with the Infant by Defendants could lead to new litigation for defamation. This defamation against the Plaintiffs is not protected by the First Amendment and it must end.

If the defamatory statements are not taken down, they will be repeated and cause more irreparable threatened or actual harm to the Plaintiffs. The Plaintiffs have a right under law to seek injunctive relief from the Court to force the Defendants to stop making and publishing defamatory statements about the Plaintiffs. Plaintiffs followed the rule of law and legal process for having such a remedy ordered by the Court. The Plaintiffs proved the statements were intentional, false and made by Defendants with the specific intent to cause reputational damage to the Plaintiffs and to invade the Plaintiffs' privacy. The Defendants continue to try to raise monies based on the defamatory statements.

#### **4. Scope of injunctive relief.**

The Court, in exercising its discretion, finds a permanent injunction is warranted under the law against the Defendants in this case. The Court exercises its discretion based on the findings of fact and conclusions of law to grant the equitable relief requested. "A permanent injunction requires a showing of threatened or actual irreparable injury." *Hood v. Poorman*, 171 Idaho 176, 519 P.3d 769, 783 (2022) (citing *O'Boskey v. First Fed. Sav. & Loan Ass'n of Boise*, 112 Idaho 1002, 1007, 739 P.2d 301, 306 (1987)). There is a threatened or actual irreparable injury to Plaintiffs if defamatory statements about the care of the Infant and the Plaintiffs are not stopped. The Defendants are aware their statements have been found by a jury and court of law to be

defamatory, so continuing to say the statements are true may expose Defendants to additional legal liability.

Defendants will be ordered to take the following actions to remove all defamatory statements and violations of the privacy of the Plaintiffs. Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

Failure by the Defendants to follow the Order for Permanent Injunctive Relief may lead to contempt proceedings, sanctions and other legal ramifications.

## **Conclusion**

Fortunately for the Infant and our community, the Plaintiffs ignored the actions of the disrupters led by Bundy and Rodriguez and instead made saving the life of the Infant their priority. Plaintiffs St. Luke's and Mr. Roth were not distracted from their mission of providing medical care when needed to any member of our community regardless of a person's ability to pay. St. Luke's followed established medical treatment procedures and DHW followed Court orders, not the demands of the Defendants. Dr. Erickson and NP Jungman followed their oaths to help and not harm their patient. But the disinformation continues by Defendants even after the Infant was returned to its parents by the court through the CPS proceedings, even after the civil lawsuit was filed, and even after the jury verdict was returned.

Defendants' continued disinformation regarding the Plaintiffs does not help our community. The actions and conduct of the Defendants have made our community less safe. Medical providers and other employees are leaving their professions because of the damage to their reputations, the invasion of their privacy, the harassment and threats of intimidation by Defendants. Defendants' conduct and the conduct of their followers selfishly prevented third parties from coming to the St. Luke's hospitals and clinics for care, prevented the family members of other patients from seeing their loved ones at the hospital, disrupted the care of other patients, and threatened the safety of employees due to the sheer noise and intimidation of armed protestors surrounding the Boise hospital. The First Amendment protects and allows citizens to protest, but the First Amendment does not allow armed citizens to attempt to enter the private property of St. Luke's when it was locked down.

The defamatory statements of Defendants against the Plaintiffs have the indirect effect of making it more difficult to attract medical professionals to Idaho. The defamatory statements have

the direct effect of causing highly qualified medical professionals to leave the profession they love due the stress from the intimidation and threats of personal harm by Defendants and their followers. The defamatory statements have the direct effect of making it more difficult for other community members to safely access medical care when needed.

A permanent injunction is warranted and appropriate in this case to stop Defendants from reposting and repeating statements that have been deemed by a jury and the Court to be defamatory and harmful to the reputational interests, privacy interests and emotional health of the Plaintiffs. A retraction by Defendants is insufficient to reverse the continued threat of irreparable harm to the Plaintiffs. Monetary damages, even if they can be collected, are inadequate to protect against further harm to the Plaintiffs or to deter Defendants. In order to avoid the threatened or actual irreparable harm to Plaintiffs reputations, professions, emotional health, the defamatory statements of the Defendants must to be removed from the online sources controlled by Defendants (directly or indirectly) and no longer repeated orally by Defendants.

### **Order**

Based on the Findings of Fact and Conclusions of Law, the injunctive relief requested by the Plaintiffs is appropriate and shall be ordered by the Court in a separate Permanent Injunction Order. Plaintiffs shall submit a proposed Permanent Injunction Order for the Court's review consistent with these Findings of Fact and Conclusions of Law. Plaintiffs are also directed to provide a proposed Default Judgment to be entered consistent with this Order, the jury verdict and previous attorney fees as sanctions ordered by the Court.

IT IS SO ORDERED.

Dated: 8/25/23

  
NANCY A. BASKIN  
District Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/25/23, I caused a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR INJUNCTIVE RELIEF to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following person(s):

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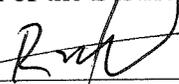
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1317 Edgewater DR #5077  
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*Pro Se Defendant*

TRENT TRIPPLE  
Clerk of the District Court

By  Deputy Clerk

**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

**DEFAULT JUDGMENT**

JUDGMENT IS ENTERED AS FOLLOWS:

1. Judgment is entered in favor of 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, N.P. against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

2. St. Luke's Health System, Ltd.'s and St. Luke's Regional Medical Center, Ltd.'s damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Nineteen Million One Hundred Twenty-Five Thousand Dollars [Fourteen Million One Hundred Twenty-Five Thousand (\$14,125,000)** in compensatory damages and **Five Million Dollars (\$5,000,000)** in punitive damages].

3. Previously Court-ordered and unpaid attorneys' fees and costs of St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. are awarded against:

- a. Defendant Ammon Bundy in the amount of **Thirteen Thousand Four Hundred Forty-Three Dollars and Twenty-One Cents (\$13,443.21)**;
- b. Defendant Ammon Bundy for Governor in the amount of **Six Thousand Eight Hundred Ninety-Five Dollars and Eighty-Six Cents (\$6,895.86)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. Defendant Freedom Man Press LLC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**;
- e. Defendant Freedom Man PAC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**; and
- f. Defendant People's Rights Network in the amount of **Eight Thousand Three Hundred Thirty-One Dollars and Ninety-Six Cents (\$8,331.96)**.

4. Chris Roth's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Eight Million Five Hundred Thousand Dollars (\$8,500,000)** [Two Million One Hundred Twenty-Five Thousand Dollars

**(\$2,125,000)** in compensatory damages and **Six Million Three Hundred Seventy-Five Dollars (\$6,375,000)** in punitive damages].

5. Natasha Erickson's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

6. Tracy Jungman's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

7. Interest shall accrue on all awarded damages bearing the statutory rate of 10.250% per annum until paid in full.

8. Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.

- iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
- iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- viii. St. Luke's reported the parents to Child Protective Services.
- ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
- x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- x. The family was discriminated against because the Infant was not vaccinated.
  - xi. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xii. The parents did not consent to the medical treatment provided to the Infant.
  - xiii. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
  - c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabyCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

- d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
- e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:

<https://www.peoplesrights.org>, <https://www.votebundy.com>,

<https://www.freedomman.org>, <https://stlukeseExposed.com>,

<https://www.facebook.com/SaveBabyCyrus/>,

<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>

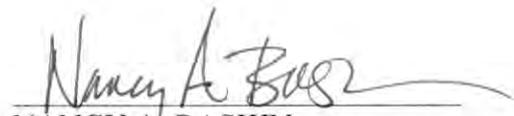
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

- f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

IT IS SO ORDERED.

DATED: 8/29/2023

  
NANCY A. BASKIN  
District Court Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following persons:

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:

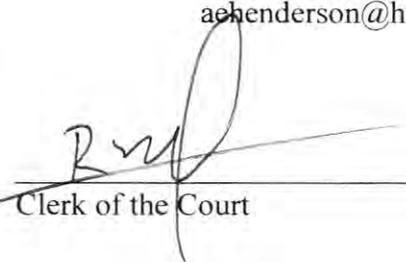
Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

Erik F. Stidham  
Jennifer M. Jensen  
Alexandra S. Grande  
Zachery J. McCraney  
Anne E. Henderson  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto:aehenderson@hollandhart.com)

DATED: 8/29/23

  
\_\_\_\_\_  
Clerk of the Court

# EXHIBIT I

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**From:** Erik Stidham  
**Sent:** Wednesday, September 20, 2023 2:50 PM  
**To:** Freedom Man Press  
**Subject:** Cease and Desist FM PAC  
**Attachments:** 2023-09-20 Cease and Desist Letter to FM PAC.pdf

Mr. Rodriguez,

See attached.

Get [Outlook for iOS](#)

September 20, 2023

**VIA U.S. MAIL AND E-MAIL**

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

**Re: *St. Luke's et al. v. Ammon Bundy et al.*  
Violations of Permanent Injunction**

Dear Mr. Rodriguez:

As founder and creator of Freedom Man PAC (“Freedom Man PAC”), you are on notice regarding Freedom Man PAC’s continued violation of the Court’s Findings of Fact, Conclusions of Law and Order for Injunctive Relief, which was issued on August 25, 2023 (“August 25 Order”), and the Court’s Default Judgment Order, which was issued on August 29, 2023 (“August 29 Order”). The Court’s clerk served you, on behalf of Freedom Man PAC, with these Orders on August 25 and August 29, respectively. The Orders are enclosed.

In its orders, the Court directs Freedom Man PAC to cease posting and disseminating specific statements, to remove unlawful content from the internet, and to deactivate unlawful links. *See* August 25 Order at 36-39; August 29 Order at 3-6.

Those orders state:

Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.

4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 25 Order at 37.

Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.
  - iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
  - iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
  - v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
  - vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
  - vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
  - viii. St. Luke's reported the parents to Child Protective Services.
  - ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
  - x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- xi. The family was discriminated against because the Infant was not vaccinated.
  - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xiii. The parents did not consent to the medical treatment provided to the Infant.
  - xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protesters' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
  - c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukensexposed.com>,  
<https://www.facebook.com/SaveBabvCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),  
[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)
  - d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
  - e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukensexposed.com>,  
<https://www.facebook.com/SaveBabvCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),  
[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)
  - f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 29 Order at 3-6.

The Court warned that failure to comply “may lead to contempt proceedings, sanctions and other legal ramifications.” August 25 Order at 37. Yet as of the date of this letter, Freedom Man PAC has refused to comply.

Freedom Man PAC’s unlawful conduct continues to cause daily, irreparable harm to my clients. It also harms our community and makes our communities less safe. *See* August 25 Order. Accordingly, my clients hereby demand that Freedom Man PAC ceases and desists from its unlawful conduct, that Freedom Man PAC remove the unlawful content from the internet, and that Freedom Man PAC deactivate the links as mandated in the Court’s orders.

A non-exhaustive list of examples of Freedom Man PAC’s unlawful content that must be removed and/or deactivated includes:

- All webpages that violate the Permanent Injunction order that begin with the <https://freedomman.org/cyrus/>
- <https://www.freedomman.org/video/government-subsidized-child-trafficking/>
- <https://www.freedomman.org/2022/my-response-to-the-idaho-statesman-st-lukes-lawsuit/>
- <https://www.freedomman.org/2023/judge-lynn-norton-and-erik-stidham-just-gag-ordered-me/>
- <https://www.freedomman.org/2023/facts-about-ammons-contempt-of-court-charge/>
- <https://www.freedomman.org/2023/judge-lynn-norton-just-intentionally-broke-the-law-proving-that-she-is-biased/>
- <https://www.freedomman.org/2023/idaho-department-of-health-and-welfare-is-the-bad-guy/>
- <https://www.freedomman.org/cyrus/archive/baby-cyrus-was-kidnapped-one-year-ago/>
- <https://www.freedomman.org/2023/diego-rodriguez-issues-challenge-to-st-lukes-and-erik-stidham/>
- <https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>
- <https://www.freedomman.org/2022/open-letter-meridian-police-ada-county-sheriff/>
- <https://stlukesexposed.com/> (all links and webpages from this website that violate the Permanent Injunction Order including, but not limited to, the following webpages and/or links embedded in the webpages: <https://stlukesexposed.com/truth-about-st-lukes/>, <https://stlukesexposed.com/lawsuit/>; <https://stlukesexposed.com/lawsuit/evidence-that-cps-agents-meridian-police-and-st-lukes-were-lying/>; <https://stlukesexposed.com/lawsuit/diego-answer-4th-amended-complaint/>; <https://stlukesexposed.com/lawsuit/judge-lynn-norton-violates-the-constitution-again/>; <https://stlukesexposed.com/lawsuit/judge-lynn-norton-judicial-misconduct/>, <https://stlukesexposed.com/lawsuit/erik-stidham-criminal-complaints/>; <https://stlukesexposed.com/lawsuit/summary-video/>).

Please comply with the Court's Permanent Injunction by September 22, 2023. If you do not, we will pursue all available legal remedies.

This cease-and-desist letter is sent without waiver of any right or remedy available at law or equity.

Sincerely,

*/s/Erik F. Stidham*

Erik F. Stidham  
Partner  
of Holland & Hart LLP

EFS:cmc  
Enclosures

30555402\_v1

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,

Plaintiff(s),

-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,

Defendant(s).

Case No. CV01-22-6789

FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER FOR PERMANENT  
INJUNCTIVE RELIEF FOR  
PLAINTIFFS

In Plaintiffs' Fourth Amended Complaint, Plaintiffs sought injunctive relief in addition to any damages awarded by the jury. The Defendants were allowed to participate in the jury trial on damages including jury selection, opening statements, cross-examination and closing arguments, but all Defendants failed to appear. After seven days of trial on the issue of damages, the jury awarded the Plaintiffs certain monetary relief on their claims. The equitable relief in the form of injunctive relief was not before the jury as injunctive relief is for the Court to decide.

Having reviewed the docket, the admitted facts in the Fourth Amended Complaint due to the Defendants' default in this lawsuit, and being informed by both the evidence presented in the trial on monetary damages as well as the jury's verdicts on the Special Verdict Form, the Court issues its Findings of Fact and Conclusions of Law on the request for permanent injunctive relief.

### **Findings of Fact**

These findings of fact are primarily based on the live testimony and exhibits presented at the jury trial on damages. The exhibits are extensive and set forth the specific "statements" of the Defendants through videos, internet postings, publications, etc. The statements speak for themselves as to who made or published the statement. The statements and publications are too numerous to repeat in this case, but each exhibit was testified to in Court and only the admitted exhibits were relied on by the Court.

The testimony on the underlying events as well as care of the C.A. (the "Infant") were relevant at trial to provide background and context regarding the conduct of the Defendants. These findings of fact are supported by the substantial and competent evidence provided by credible witnesses and exhibits admitted during the trial. The Court will generally refer to the nature of statements and the contents of the statements without citing all the exhibits to support each finding of fact. All exhibits admitted are part of the Court record in this matter.

1. The Plaintiffs brought this action in response to the Defendants' statements and publications made against the named Plaintiffs, the trespass that occurred on

St. Luke's<sup>1</sup> hospitals in Meridian and Boise. The events that started the interactions between Plaintiffs and Defendants centered on the medical care of the Infant.

2. Nurse Practitioner Nadia Kravchuk, the Infant's primary care provider (PCP) saw the ten month old Infant on or about March 1, 2022. The Infant was severely dehydrated and the parents said the baby was vomiting. The Infant had lost approximately 4 pounds since its six-month wellness visit. NP Kravchuk's office was unable to provide the necessary care and IV to rehydrate the Infant in her office. The parents were directed to the St. Luke's Boise Hospital emergency room where the Infant could be rehydrated.
3. The Emergency Room (ER) doctor on duty at St. Luke's determined not only was the Infant severely dehydrated, but the Infant was suffering from severe malnutrition. The ER doctor consulted with the Pediatric Hospitalist on duty, Dr. Erickson, who agreed the Infant should be admitted. Dr. Erickson agreed with the ER doctor's diagnosis of severe malnutrition and dehydration. Dr. Erickson testified the condition of the Infant was dire and without proper medical intervention, the Infant was at risk organ failure and possible death. This was NOT a healthy baby when it arrived at the hospital on March 1, 2022. The parents reported to Dr. Erickson that the Infant was doing well until about 7 months of age and then reoccurring vomiting started and such vomiting would continue for several days. *See*, Exhibit 1, page 12.
4. Dr. Erickson is Board-Certified in both General Pediatrics and Pediatrics Hospital Medicine. She a highly trained pediatric doctor. Dr. Erickson consulted with the parents regarding the condition of the Infant. The parents agreed to the care plan to rehydrate

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<sup>1</sup> The Court will prefer to Plaintiffs St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center Ltd. Collectively as "St. Luke's."

and increase caloric intake for the Infant recommended by Dr. Erickson. At no time did Dr. Erickson threaten the parents to call child support enforcement if the parents did not agree to the treatment plan.

5. The parents did not want the Infant vaccinated. No medical provider vaccinated the Infant and that preference of the parents was respected. There was testimony by Dr. Erickson and NP Jungman, the parents' decision not to vaccinate the Infant did not in any way impact the care plan for the Infant or the respect shown the parents.
6. Prior treatment medical records for the Infant's medical care since birth were not provided by the parents and could not be obtained by Dr. Erickson beyond NP Kravchuk's limited records. This led to some additional tests being run to rule out other potential causes for the Infant's condition. Dr. Erickson noted the Infant was failing to thrive.
7. With proper medical intervention and treatment, including IVs to rehydrate, bottle feedings as well as additional feedings through a nasogastric feeding tube (NG tube), the Infant's medical condition improved.
8. Dr. Erickson arranged for St. Luke's staff and social worker to assist parents apply for and receive Medicaid so there would be no out-of-pocket cost to the family for the Infant's care. The family had no medical bills that were not paid by Medicaid for the Infant's care.
9. Dr. Erickson also arranged for a home health nurse to come to the Infant's home to check on the progress of the child and to help with any further needs for the child and family members caring for the child. Dr. Erickson explained, and the parents seemed to understand, that continuing the additional caloric intake was critical as the feeding

plan being used prior to the hospitalization was insufficient to allow the Infant to grow and thrive. Regular weight check-ins were also critical for determining if the Infant was or was not continuing with gaining weight as he had done in the hospital. The parents were trained on how to complete additional feedings via the NG tube. The parents were also advised to continue breast-feeding the Infant in addition to the other necessary feedings.

10. On March 4, 2022, the Infant's medical condition had improved to where the Infant could be cared for at home and the Infant was released to the parents with discharge instructions and verbal commitments by the parents they would comply with the instructions and call if they had questions or needed any further assistance.
11. The parents did not follow the discharge instructions for care for the Infant. Nor would the parents allow the home health nurse to come to their home to check on the Infant on March 5, 2022 or March 6, 2022.
12. Finally, on March 7, 2022, the parents took the Infant to NP Dkystra (who was not a St. Luke's medical provider but who St. Luke's had connected the family with as he would be able to assist with the NG tube and NP Kravchuk indicated she was not able to provide that level of care for the Infant). At this appointment, the Infant's weight had dropped since it was released from the hospital. NP Dkystra advised the parents how to increase caloric intake and set another appointment for March 11, 2022 to check the Infant's weight.
13. On March 11, 2022, the parents missed bringing the Infant to the scheduled appointment.

14. On March 11, 2022, NP Aaron Dkystra (not any doctor, NP or staff member of St. Luke's) called Department of Health and Welfare Child Protection Services (CPS) regarding his concern about the Infant and requesting a check on the child to make sure the weight of the Infant was not continuing to drop and thus endangering the Infant's life. NP Dkystra had a statutory duty to report his concerns regarding medical neglect by the Infant's parents.
15. A Department of Health and Welfare (DHW) Safety Assessor was assigned to the case. She also made contact with NP Jungman and law enforcement who regularly assist with investigation and welfare checks on children.
16. Going into a weekend, the need to have the Infant's status checked became a greater concern for the Infant's well-being. The DHW Safety Assessor came to Ms. Jungman's office to discuss the referral regarding the Infant. NP Jungman reviewed limited medical records. The DHW Safety Assessor could not reach the Infant's parents. NP Jungman said she would stay at work to see the Infant if parents would bring the Infant in.
17. NP Jungman has been a nurse or nurse practitioner for over 24 years. She is highly skilled based on her studies and work experience. She specializes her practice in providing clinical care and evaluation of children. She has also been trained in and has extensive experience in CPS process.
18. On March 12, 2022, the parents called and indicated they would take the child to St. Luke's Children at Risk Evaluation Services (commonly referred to by its acronym CARES unit) for a weigh-in and wellness check at 4:00 p.m. The parents never arrived for the appointment.

19. Detective Fuller of the Meridian Police Department consulted with Nurse Practitioner Jungman at CARES about what to look for when they were able to put eyes on the Infant to determine if the Infant was or was not doing well. Detective Fuller is experienced at CPS investigations and is trained in the legal standard necessary to remove a child from his or her parents' care.
20. Law enforcement attempted contact with the parents to check on the Infant at the home address provided. Defendant Rodriguez answered the door and would not let law enforcement check on the child.
21. Later that evening, law enforcement was able to track parents down in a vehicle and initiated a traffic stop to investigate the CPS referral and check on the Infant's welfare.
22. Defendants had communicated with their followers and had a large number of persons arrive at the gas station where the traffic stop occurred.
23. With the Infant being held by its mother, Detective Fuller did a welfare check on the child. The NG tube was no longer in place. The Infant presented with symptoms and observations indicating it was not doing well and was in imminent danger. The Infant and his mother were taken to the ambulance.
24. In the ambulance, the Infant was removed from the mother due to Detective Fuller's determination the Infant was in imminent danger. Detective Fuller completed the paperwork to take the Infant into the custody of DHW and to get the Infant transported to the nearest ER.
25. The Emergency Medical Technicians at the scene determined the Infant was "medically stable to transport." "Medically stable to transport" status is not the same as a patient

being medically stable and healthy and in no need of further medical care. It is simply a determination it is safe to transport the patient in the ambulance to the hospital.

26. The Infant was transported to the closest hospital, St. Luke's Meridian hospital, by ambulance.

27. At the ER, Dr. Rachel Thomas examined the Infant. She is a Board-Certified Emergency Room doctor who also has extensive medical experience and training involving children, including treatment of malnutrition and dehydration. Dr. Thomas also determined the Infant was in imminent danger/harm and needed a higher level of care that could be provided at the St. Luke's Children's Hospital at the main St. Luke's hospital in Boise.

28. Even after a bottle feeding in the ER in which the Infant gulped down 6 ounces of formula, Dr. Thomas noted the Infant's weight was less than the weight when the Infant left the St. Luke's Children's Hospital on March 4, 2022. Dr. Thomas diagnosed the Infant with severe malnutrition and dehydration that could lead to death if not immediately addressed.

29. Dr. Thomas testified that the defamatory statements and postings about her by the Defendants have led to emotional stress such that she is taking a break from medicine and leaving the community with her family for an extended period of time. It is her hope she will be able to return and actively continue her medical career.

30. Defendant Bundy arrived at St. Luke's Meridian and with others blocked the ambulance bay from other ambulances being able to come to the hospital. Bundy was demanding release of the Infant even though he was not a family member or guardian of the Infant.

31. The protesters grew in number. The Meridian Police were called. The access doors to the ambulance bay were locked. Bundy was eventually trespassed from the private property of St. Luke's and was arrested along with another person engaged in the protests in the ambulance bay.
32. With active protesting occurring at the ER, Dr. Thomas consulted with hospital security and the Meridian Police Department and had the Infant safely transported to the Children's Hospital after determining the Infant was medically stable to be transported.
33. Dr. Thomas called Dr. Erickson and asked to have the Infant admitted. Dr. Erickson agreed to the admission and immediately went to the hospital to assist with the admission of the Infant to St. Luke's Children's Hospital and to begin further treatment.
34. Even though the Infant was in the custody of the DHW, St. Luke's medical professionals informed the parents of the care plan and the parents consented to all treatment provided by Dr. Erickson as well as by the other Pediatric Hospitalists caring for the Infant.
35. Dr. Erickson confirmed the Infant had in fact lost significant weight<sup>2</sup> since its release on March 5, 2022. Another NG tube was placed, and feedings and hydration began on the Infant.
36. Other Pediatric Hospitalists also provided care for the Infant when Dr. Erickson was not on duty.

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<sup>2</sup> It is important to note that while the amounts of weight loss or gain in this case may not "sound" significant, for the age and size of the Infant in this case and where the Infant was measured at being on the growth chart (in lower than 0.5% of all infants this age), the weight loss was significant and could lead to organ failure and death.

37. NP Jungman also consulted with the Pediatric Hospitalists and participated in the phone and in-person communications with the parents during the time the Infant was at the Children's Hospital. She also stayed involved in the care when the Infant was released to DHW's caregiver.
38. The parents were regularly updated by St. Luke's employees about the Infant's status and were allowed to visit and hold the Infant for approximately two hours at the hospital on or about March 13, 2022. Other visits and communications also occurred while the Infant was at the Children's Hospital.
39. While the Infant was being treated at the Children's Hospital, the Defendants Bundy and Rodriguez, in conjunction with multiple communications sent out by the other Defendants, organized protestors at St. Luke's Boise Hospital. The protests involved hundreds of people including people armed with weapons. Defendant Rodriguez made statements on March 14, 2022 that the Infant was being abused and mistreated by St. Luke's.
40. On March 12, 2022, the Defendants and followers of the Defendants were instructed by Bundy, Rodriguez and the websites or communications from People's Rights Network (PRN) and Freedom Man Press LLC to disrupt the operations of the St. Luke's by jamming the phone lines complaining and demanding the release of the Infant.
41. Bundy and Rodriguez would not leave the private property of St. Luke's when asked. Boise Police and Idaho State Troopers were brought in to maintain the security of the hospital.

42. Eventually, the threat of risk of harm to patients, patients' families, employees and a breach of the hospital became too great and the hospital was forced into lockdown and to close the hospital to new patients.
43. Armed protesters and followers of the Defendants attempted to enter the hospital even after it was locked down.
44. After it was discovered that the Infant had been removed from the hospital, the protesters moved their demonstrations to DHW offices.
45. The Infant was doing better and was discharged from St. Luke's on March 15, 2022 to DHW custody. The parents were allowed more and more time with the Infant by DHW as part of the safety/reunification plan.
46. Through intensive medical efforts, the Infant began gaining weight and his risk of imminent harm was eliminated. The Infant required ongoing monitoring to make sure it was continuing to gain weight and thrive. Additional calories were being given via the NG tube by the Infant's caregivers.
47. DHW stayed in regular communication with CARES and the parents regarding care of the Infant. NP Jungman along with the Medical Director of CARES evaluated the Infant 3-4 times and the Infant was gaining weight.
48. On March 18, 2022, the parents called DHW as the feeding tube had inadvertently come out while the parents had care of the Infant as part of DHW's safety/reunification plan. The parents did not want to go to hospital or have the Infant seen at their home. The parents requested NP Jungman reinstall the NG tube. DHW arranged a place and time to meet the parents away from protesters who were at the main DHW office. NP

Jungman reinstalled the NG tube in the Infant, following applicable standards of care for such a procedure.

49. NP Jungman and the CARES Medical Director evaluated the Infant again on March 23, 2022 with the parents present. The follow-up weight check showed the Infant was continuing to progress. The Infant was more interactive than at previous visits. Home health and PCP care was discussed again with parents.

50. Dr. Michael Whelan, a Board-Certified Pediatrician who works at St. Alphonsus, testified he concurred in the diagnosis and all of the care provided to the Infant. He confirmed based on the medical records that the Infant was in imminent danger based on its dehydration and malnutrition and the Infant was failing to thrive. He further opined that all care provided met the standard of care and there was no medical malpractice or misdiagnoses by any medical practitioner and specifically not by either of the named plaintiffs, Dr. Erickson and NP Jungman. He opined the NG tube was necessary and appropriate both times at the hospital. He opined the discharge instructions from St. Luke's were appropriate. He opined the re-installation of the NG tube by NP Jungman was within the standard of care and did not cause any infection or disease to the Infant as the placement of the tube was into a non-sterilized location of the body, the stomach. He opined the re-installation of the HG tube did not cause an infection in the Infant.

51. Dr. Whelan also opined the parents of the Infant were "medically neglectful" for not following through on discharge instructions and with follow up visits for weight checks to make sure feedings were providing the Infant with sufficient caloric intake. Dr.

Whelan opined he believed the parents knew the Infant had lost weight after first time Infant was released from hospital on March 4, 2022.

52. Dr. Whelan opined that, based on all the outside pressure by Defendants, St. Luke's, Dr. Erickson and NP Jungman performed very well and there was no evidence that the Infant was not improving while in the care of St. Luke's.

53. Based on the testimony of Kyle Bringhurst, the Ada County Deputy Prosecutor who handled the Infant's case and has 8-9 years of experience involving CPS cases, the CPS proceedings and requisite findings for placement into DHW custody occurred as required by statute. A shelter hearing was held on March 15, 2022 and a mandatory adjudicative hearing was set. A Notice of Dismissal by the State was filed on or about May 4, 2022, so the adjudicatory hearing set for May was vacated. The Infant was returned to the custody of the parents with a safety plan.

54. David Jeppesen, Director of the Department of Health and Welfare, also testified the CPS process is defined by statute and was followed in this case. The courts, not the DHW, decide if a child is allowed to return to his or her parents. The goal is to reunite children with their parents and this goal in Idaho is achieved in about 65% of the CPS cases (which is much higher than the national average).

55. Director Jeppesen also testified the DHW does not get "extra money" for placing a child in the care of DHW per the CPS statute. The legislature sets the budget for the DHW and there is no increase in monies to the DHW for children taken into temporary custody under the CPS. Director Jeppesen also testified that allegations of child trafficking or kidnapping are untrue. While there are some adoptions of children whose parents are not fit to raise them, this is in accordance with Idaho's statutes and court

approval is required for all such adoptions. Finally, such adoptions do not happen frequently and there is no preference for persons of a particular sexual orientation as alleged by Defendants.

56. Immediately after the CPS referral was made and the Infant was removed from the parents, the Defendants Bundy and Rodriguez, through their own statements, video postings, communications with their followers and their internet postings on the websites of the other Defendants: Peoples Rights Network (PRN), Freedom Man Press, LLC and Ammon Bundy for Governor -- which Bundy and/or Rodriguez controlled-- began doxxing<sup>3</sup> and intimidating the Plaintiffs, other medical providers as well as anyone involved in the CPS matter (including but not limited to law enforcement, the prosecuting attorney, the judge handling the confidential CPS court proceedings, and the Safety Assessor for DHW).
57. Defendants' statements were intended to damage the reputations of the Plaintiffs; invade the privacy of Mr. Roth, Dr. Erickson, and NP Jungman; to shut down St. Luke's Hospital; and to threaten harm to those involved in the CPS case involving the Infant.
58. Defendants Bundy and Rodriguez are actively involved in and are spokespersons for PRN. Defendant Rodriguez controls and authors many of the statements posted on Defendant Freedom Man Press, LLC's website, which published Bundy and Rodriguez's defamatory statements on the internet and on other extremist media outlets. Bundy and Rodriguez hold themselves out to be anti-government activists motivated by certain religious beliefs. Bundy encourages militia-style training for his

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<sup>3</sup> Doxxing includes publicly identifying or publishing private information about a person as a form of punishment or revenge.

followers. He urges his followers to take action outside the law to protect their rights. Defendants Bundy and Rodriguez, PRN and Freedom Man Press, LLC are willing to encourage others to join them in using violence to reach their objectives and to harass public employees such as law enforcement, DHW employees, CPS prosecutors, and judges.

59. Bundy and Rodriguez used the tactic of “public shaming” through false and defamatory narratives to intimidate and defame the Plaintiffs. This included but was not limited to accusing the Plaintiffs to be involved in kidnapping, child trafficking, child abduction, abusing children, and stealing children for money and pedophilia. This intimidation also included releasing private information about Mr. Roth, Dr. Erickson and NP Jungman which put these Plaintiffs and their families at risk of harm as testified to at trial.
60. PRN was a supporter of Ammon Bundy for Governor, and the events in this case were the topic of Bundy at political gatherings, and defamatory statements about Plaintiffs were made by Bundy at his political events and made for the indirect purpose of raising campaign contributions.
61. Spencer Forby, an expert on extremist organizations as well as a highly trained law enforcement officer and instructor on de-escalating situations, crowd control and SWAT techniques, opined that Defendants Bundy, Rodriguez, PRN and Freedom Man Press, LLC, used their defamatory statements and disinformation rhetoric to trigger their followers to a call for action based on false premises, which then led to Defendants Bundy and Rodriguez creating conspiracy theories of heinous criminal allegations by Plaintiffs without any factual basis. In order to maximize the involvement of the

Defendants' followers, there was a strategic coordination of the false and defamatory messages being repeated over websites controlled by Defendants and shared with other extremist media outlets.

62. Defendants' followers then quickly joined the protest at the hospital and the efforts outside Idaho to disrupt the business of St. Luke's by flooding the phone lines. The false and defamatory statements of Bundy and Rodriguez were then used by followers and the Defendants to harass and intimidate the Plaintiffs via verbal, in-person and online threats.

63. Bundy directed his followers to be ready to "fight it out on the street." Bundy and Rodriguez created a false and defamatory conspiracy theory against the Plaintiffs and repeated it over and over again in an effort to have St. Luke's put out of business and the medical providers to lose their jobs. The Plaintiffs testified they believed the statements presented real threats of violence to them personally as well as their families. Plaintiffs testified as to the specific steps they took as a result of the intimidation and defamatory statements to protect themselves and their family members. Plaintiffs also testified to having to daily track the social media of all the Defendants to weigh and prepare for threatened harm.

64. According to Jessica Flynn, an expert on reputational harm, and Beth Toal, St. Luke's Vice President for Communications, Bundy's and Rodriguez's tactics are deliberate and intentional. Their marketing techniques and use of social media have the effect of disseminating knowingly defamatory information and disinformation to radicalize their followers and at the same time get media coverage of their actions and raise monies for their organizations based on their defamatory statements. The Defendants wanted their

messages to go viral as well as deep and wide, and to have lasting effects. The Defendants wanted their social media attack and protests to prevent St. Luke's from providing services to others. The Defendants also created a clear connection in their social media for contributions to support their conduct. The media recognition gained by the Defendants through their disinformation and defamatory statements is intended to raise their individual profiles as well as their organizations' profiles.

65. The extremist and marketing experts testified the Defendants also used the Infant being taken into CPS custody to increase their own visibility on the internet and in the community as well as to raise money for themselves through the organizations they controlled. This conduct continues to the present and it is not expected to stop as it is a source of fundraising for Bundy's and Rodriguez's organizations.
66. Defendants Bundy and Rodriguez organized and promoted the protests at St. Luke's. These protests involved armed individuals, which is consistent with Bundy's involvement in prior protests and his statements/trainings of his followers about the use of force. The experts testified that the militia training promoted and offered by PRN creates a threat and possible risk of physical harm.
67. On the advice of law enforcement, who indicated they could not restrain the number of protesters (estimated to be 400 persons), St. Luke's was forced to lock down the entire downtown campus and to redirect patients to other facilities.
68. The lockdown also prevented families from entering the hospital to see their loved ones, prevented third parties from seeking care or attending a scheduled appointment at the Boise campus, and prevented employees from coming or leaving their shifts.

69. St. Luke's Chief Financial Officer as well as Dennis Reinstien, CPA, testified that economically St. Luke's lost significant revenue from cancelled treatment or appointments. St. Luke's also incurred additional security costs during the protests and had to increase the number of individuals involved in security at all of its facilities to be prepared for future protests organized by the Defendants.
70. The Defendants knew or reasonably should have known the statements they were making were false and defamatory. Defendant Rodriguez is the grandfather of the Infant and the medical records provided to his daughter (mother of the Infant) easily could have been reviewed by him. Instead, he made false and defamatory statements regarding the health of the Infant, the actual medical care diagnoses and the care provided.
71. Rodriguez also claimed without any legal statutory support that the actions of the CPS were unlawful and was involved with a marketing plan for donations for the Infant and its family, as well as to monetize his and Bundy's organizations.
72. No evidence was presented that any of the Defendants have medical training, knowledge or education to support their false and defamatory statements regarding the Infant's health status and the need for medical care.
73. The intentional, materially false and malicious defamatory statements by the Defendants include, but are not limited to, the following:
- a. The Infant was perfectly healthy when taken by CPS.
  - b. St. Luke's made the Infant sick and infected the Infant with disease.
  - c. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.

- d. St. Luke's, St. Luke's management, law enforcement, DHW, the courts, and the medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- e. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- f. DHW makes more money for every child it takes into CPS custody and that is why the DHW kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- g. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- h. St. Luke's reported the parents to CPS.
- i. Dr. Erickson threatened to file a report with CPS if the parents did not agree to the treatment plan between March 1-4, 2022.
- j. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
- k. The family was discriminated against because the Infant was unvaccinated.
- l. The parents have thousands of dollars of medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
- m. The parents did not consent to the medical treatment provided to the Infant.

n. The Infant was released from the Children's Hospital and returned to directly to the family due to *the protesters'* or Defendants', actions.<sup>4</sup>

74. These false statements were repeated again and again by Defendants, including using links to the statements on other websites and video recordings. "Wanted" posters were made for Mr. Roth, Dr. Erickson and NP Jungman (as well as others involved who were doxxed) and posted on the internet as well as distributed at the protests at the St. Luke's Boise campus. The Plaintiffs and others involved in the events were repeatedly threatened by Defendants' actions of encouraging their followers to take action into their own hands and disclosing personal information about Mr. Roth, Dr. Erickson and NP Jungman. Phone messages to St. Luke's from followers across the county repeated the false and defamatory statements of Bundy and Rodriguez.

75. St. Luke's senior management officers testified it is now more difficult to recruit doctors and other medical providers to Idaho due to the events surrounding the Infant and the Defendants' harassment and defamatory statements towards St. Luke's and its employees.

76. The defamatory statements by the Defendants were completely unfounded, false, made intentionally, and maliciously harmed the reputations of the Plaintiffs and others who were doxxed. These false statements invaded the privacy of Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman by portraying them in a false light as persons who harm children. The defamatory statements and conduct of the Defendants intentionally inflicted emotional distress on Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman as

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<sup>4</sup> The Infant was returned to its parents by the Court through the dismissal of the CPS case, not the actions of Defendants.

well as other parties who were doxxed and threatened. Mr. Roth, Dr. Erickson and NP Jungman all presented substantial and credible evidence of the actual harm they (and their families) suffered due to Defendants' defamatory statements, invasion of privacy and intentional infliction of emotional distress upon Plaintiffs by attacking their professional reputations.

77. Experts Devin Burghart, Spencer Fomby, and Jessica Flynn all testified that once on the internet, it is difficult to remove defamatory statements from the internet. In this case, the Defendants took steps to regularly re-post prior videos and postings and to create links to the false statements on the website of other media sources, thereby knowingly increasing the viewers of the published defamatory statements. The original posts as well as present statements continue on the Internet such as when Bundy or Rodriguez are quoted with links to other websites about this litigation. See Idaho Dispatch quotes and postings in the Declaration of Jennifer Jensen in support of the requested injunctive relief.
78. The extremist organization experts testified the defamatory statements are re-posted by the Defendants in order to keep them in the news and to generate new followers and more donations.
79. C.P. "Abby" Abbodandolo, Senior Director of Security for St. Luke's, who has extensive hospital security and law enforcement experience, testified he was shocked how quickly the Defendants could mobilize their followers to protest, make signs, and come armed and ready to take action. He also testified the Defendants and their followers create an ongoing threat to St. Luke's operations throughout the state.

80. The DHW Safety Assessor left DHW employment and moved out of state due to the doxxing. Dr. Thomas testified she is leaving and moving from the state for a period of time in hopes that she can safely return to practice medicine. Employees left St. Luke's employment due to the protesting and intimidation. Dr. Erickson has considered leaving a job she loves due to the ongoing emotional distress and intimidation of the Defendants. NP Jungman has suffered and continues to suffer from emotional distress, and the intimidation affects how she interacts with parents of other patients.

81. The extremist group experts Burghart, Fomby, and Flynn described both Bundy and Rodriquez as an anti-government activists, conflict disrupters, and disrupter entrepreneurs. Their business model is to raise money for themselves or the organizations they control from followers based on false, fraudulent and defamatory statements. The Defendants have used disinformation (misinformation that is intentionally spread) to harm Plaintiffs.

82. Dr. Camille LaCroix, Forensic Psychiatrist, testified as to the continuing emotional distress to Dr. Erickson and NP Jungman, and that this is not likely to go away and gets worse every time there is a new or a re-posting of a defamatory statement, an article or threat against them personally. Dr. Erickson's husband testified as to the need to continually monitor social media postings to make sure his wife and family are safe. According to Dr. LaCroix, Dr. Erickson and NP Jungman can be triggered and suffer more emotional distress by the re-posting of defamatory statements and invasions of their privacy that cause them to change how they treat others and how they protect their families.

83. Dr. Erickson and NP Jungman each testified that defamatory statements, harassment and intimidation as a result of Defendants' actions affects their life every day professional and in their personal relationships. Both testified as to the constant fear they have due to Defendants defamatory attacks in the newspapers, on tv, and on the internet.

84. The evidence provided at the jury trial was substantial and competent evidence that established the claims of defamation, invasion of privacy and intentional infliction of emotional distress due to the Defendants' conduct. These claims were satisfied by the applicable burden of proofs of preponderance and clear and convincing evidence.

85. As to the defamation claims, the Court finds:

- a. The Defendants communicated information concerning the Plaintiffs to others;
- b. The information impugned the honesty, integrity, virtue or reputation of the Plaintiffs or exposed the Plaintiffs to public hatred, contempt or ridicule;
- c. The information was false;
- d. The Defendants knew it was false or reasonably should have known that it was false; and
- e. Plaintiffs suffered injury caused to the defamation.

86. As to the Invasion of Privacy claims, the Court finds:

- a. The Defendants placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye by publicly disclosing some falsity or fiction concerning Mr. Roth, Dr. Erickson, and NP Jungman.
- b. A disclosure of some falsity or fiction means that a publication or publications by

Defendants were materially false.

- c. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman suffered injury caused by the false light invasion of their privacy.

87. As to the Intentional Infliction of Emotional Distress claims, the Court finds:

- a. Defendants engaged in intentional or reckless conduct;
- b. That was extreme and outrageous;
- c. Causing severe emotional distress to Mr. Roth, Dr. Erickson, and NP Jungman;  
and
- d. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman were injured and the emotional distress was proximately caused by Defendants' conduct.

88. The Defendants' defamatory statements including allegations of conspiracy by the Plaintiffs, law enforcement, the courts and DHW to engage in criminal conduct against children is not supported by any evidence.

89. The false and defamatory statements were made as part of a tactical and sustained marketing campaign to defame and smear the reputations of the Plaintiffs, incite unlawful conduct by Defendants' followers, create a fear of future physical harm to Plaintiffs, and to create an incentive for followers to make donations to Defendants or organizations they controlled.

90. The Defendants actions in this case, as well as the fact that they refuse to stop making defamatory statements, repeat past defamatory statements, presents a continuing threat of actual irreparable harm to Plaintiffs. The continuing threat has led to St. Luke's increasing its security at each of its hospitals. The named Plaintiffs continue to be the subject of threats by Defendants or their followers. The threats include but are not

limited to personal, professional or family member harm through Defendants internet presence and re-posting of prior defamatory statements. A prior Protection Order by the Court has failed to deter Defendants from making knowingly false and defamatory statements and repeating such statements.

### **Conclusions of Law**

The Court requested supplemental legal support for Plaintiffs position they are entitled to equitable relief in the form a permanent injunction. Plaintiffs file a memorandum and supplemental brief and declaration in support of the request injunctive relief. In the Declaration of Jennifer M. Jensen, she indicates the Idaho Dispatch (which is not a party to this lawsuit) continues to post Defendant Rodriguez's and Bundy's defamatory statements about the Plaintiffs and counsel involved in this case on the internet even after the jury trial on damages has ended. Defendant Rodriguez filed an "Answer to Request for Permanent Injunctive Relief."<sup>5</sup> The Court has considered the findings of fact and the entire court record including Rodriguez's filings in making its ruling on injunctive relief.

#### **1. Whether or not to grant permanent injunctive relief is within the discretion of the trial court.**

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<sup>5</sup> Defendant Rodriguez claims in part there has never been an evidence-based trial as to whether or not the things he said were true and he believes all his statements were true. The Court notes the jury trial was evidence-based (with testimony and admitted exhibits), but Defendant Rodriguez elected not to attend and cross examine witnesses or challenge the admissibility of evidence. Defendant Rodriguez also claims injunctive relief is a violation of his First Amendment rights. For the reasons discussed in this Findings of Fact and Conclusions of Law, the Court finds injunctive relief is allowed as a matter of law and appropriate in this case.

In *Gem State Roofing, Incorporated v. United Components, Incorporated*, 168 Idaho 820, 828, 488 P.3d 488, 496 (2021), the Idaho Supreme Court held “The granting or refusal of an injunction is a matter resting largely in the trial court’s discretion.” (citing *Higginson v. Westergard*, 100 Idaho 687, 689, 604 P.2d 51, 53 (1979)). In applying its discretion, this Court must: (1) correctly perceive the issue as one of discretion; (2) act within the outer boundaries of its discretion; (3) act consistently with the legal standards applicable to the specific choices available to it; and (4) reach its decision by the exercise of reason. *Lunneborg v. My Fun Life*, 163 Idaho 856, 863, 421 P.3d 187, 194 (2018). The Supreme Court in *Gem State Roofing* went on to discuss the different standards for preliminary versus permanent injunctions:

As an initial observation, UCI's reliance on the standard for a *preliminary* injunction is inapposite. Rule 65(e) enumerates five grounds for entry of a preliminary injunction. A preliminary injunction is a temporary injunction effective for the pendency of the litigation before the merits of the case are decided. I.R.C.P. 65(e). Preliminary injunctions are designed to protect clearly established rights from imminent or continuous violation during litigation. See *Gordon v. U.S. Bank Nat'l Ass'n*, 166 Idaho 105, 455 P.3d 374, 384 (2019) (quoting *Brady v. City of Homedale*, 130 Idaho 569, 572, 944 P.2d 704, 707 (1997)) (“A district court should grant a preliminary injunction ‘only in extreme cases where the right is very clear and it appears that irreparable injury will flow from its refusal.’”). A permanent injunction, on the other hand, is entered at the resolution of the case, and requires a showing of threatened or actual irreparable injury; in addition, in order to deny a permanent injunction the trial court must be persuaded that there is “no reasonable expectation that the wrong will be repeated.” *O'Boskey*, 112 Idaho at 1007, 739 P.2d at 306. In other words, a trial court may appropriately deny a preliminary injunction at the outset of a case when there are complex issues of fact and law yet to resolve, but correctly grant a permanent injunction once those issues have been resolved in favor of the plaintiff.

*Gem State Roofing*, 168 Idaho 820, 834–35, 488 P.3d 488, 502–03 (2021).

In this case, the Court finds based on the Findings of Fact and the Declaration of Jennifer Jensen, the Plaintiffs have established by substantial and competent evidence of threatened or

actual irreparable damage as well as a reasonable expectation that the wrong will be repeated by the Defendants if permanent injunctive relief is not granted. The jury's monetary damages, if able to be collected, are inadequate to protect Plaintiffs from continued and ongoing injuries to their reputations, privacy, emotional health, ability to practice their chosen professions and reside in the community without fear, and to allow the community to trust that St. Luke's hospital system is not in any way engaged in heinous criminal conduct towards its patients. Balancing the hardships between Plaintiffs and Defendants' alleged chilling of their freedom of speech rights, the balance tips in favor of Plaintiffs. A remedy in equity is warranted as defamatory speech is not protected free speech. Finally, the public interest would not be disserved by a permanent injunction of the scope outlined in this decision. The permanent injunctive relief is appropriate to eliminate the ongoing irreparable threatened and actual harm to all Plaintiffs.

**2. Defendants' defamatory statements are not protected speech under the First Amendment.**

The United States is a republic founded on the doctrine of the rule of law. What that means is all persons are expected to follow the laws adopted through our representational form of government. It also means all persons, no matter their status, wealth or beliefs must follow the rule of law.

The First Amendment to the United States Constitution provides:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press or the right of the people to peacefully assemble, and to petition the Government for a redress of grievances.

However, these rights are not absolute. Every right under the Constitution is subject to limits, and a person or entity cannot make or publish knowingly false statements that intentionally cause reputational or other damage to another and then hide behind the First Amendment as a shield. The

United States Supreme Court has recognized categories of speech that the government can regulate because of the content of the speech, as long as the government does so evenhandedly. *See R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992) (categories of speech that are limited: obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, and child pornography). In *R.A.V.* the Court stated:

The First Amendment generally prevents government from proscribing speech, *see, e.g., Cantwell v. Connecticut*, 310 U.S. 296, 309–311, 60 S.Ct. 900, 905–906, 84 L.Ed. 1213 (1940), or even expressive conduct, *see, e.g., Texas v. Johnson*, 491 U.S. 397, 406, 109 S.Ct. 2533, 2540, 105 L.Ed.2d 342 (1989), because of disapproval of the ideas expressed. Content-based regulations are presumptively invalid. *Simon & Schuster, Inc. v. Members of N.Y. State Crime Victims Bd.*, 502 U.S. 105, 115, 112 S.Ct. 501, 508, 116 L.Ed.2d 476 (1991) *id.*, at 124, 112 S.Ct., at 512–513 (KENNEDY, J., concurring in judgment); *Consolidated Edison Co. of N.Y. v. Public Serv. Comm'n of N.Y.*, 447 U.S. 530, 536, 100 S.Ct. 2326, 2332–2333, 65 L.Ed.2d 319 (1980); *Police Dept. of Chicago v. Mosley*, 408 U.S. 92, 95, 92 S.Ct. 2286, 2289–2290, 33 L.Ed.2d 212 (1972). From 1791 to the present, however, our society, like other free but civilized societies, has permitted restrictions upon the content of speech in a few limited areas, which are “of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality.” *Chaplinsky, supra*, 315 U.S., at 572, 62 S.Ct. at 762. We have recognized that “the freedom of speech” referred to by the First Amendment does not include a freedom to disregard these traditional limitations. *See, e.g., Roth v. United States*, 354 U.S. 476, 77 S.Ct. 1304, 1 L.Ed.2d 1498 (1957) (obscenity); *Beauharnais v. Illinois*, 343 U.S. 250, 72 S.Ct. 725, 96 L.Ed. 919 (1952) (defamation); *Chaplinsky v. New Hampshire, supra* (“ ‘fighting’ words”); *see generally Simon & Schuster, supra*, 502 U.S., at 124, 112 S.Ct., at 513–514 (KENNEDY, J., concurring in judgment). Our decisions since the 1960's have narrowed the scope of the traditional categorical exceptions for defamation, *see New York Times Co. v. Sullivan*, 376 U.S. 254, 84 S.Ct. 710, 11 L.Ed.2d 686 (1964); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974); *see generally Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 13–17, 110 S.Ct. 2695, 2702–2705, 111 L.Ed.2d 1 (1990), and for obscenity, *see Miller v. California*, 413 U.S. 15, 93 S.Ct. 2607, 37 L.Ed.2d 419 (1973), but a limited categorical approach has remained an important part of our First Amendment jurisprudence.

We have sometimes said that these categories of expression are “not within the area of constitutionally protected speech,” *Roth, supra*, 354 U.S., at 483, 77 S.Ct., at 1308; *Beauharnais, supra*, 343 U.S., at 266, 72 S.Ct., at 735; *Chaplinsky, supra*, 315 U.S., at 571–572, 62 S.Ct., at 768–769; or that the “protection of the First Amendment does not extend” to them, *Bose Corp. v. Consumers Union of United*

*States, Inc.*, 466 U.S. 485, 504, 104 S.Ct. 1949, 1961, 80 L.Ed.2d 502 (1984); *Sable Communications of Cal., Inc. v. FCC*, 492 U.S. 115, 124, 109 S.Ct. 2829, 2835, 106 L.Ed.2d 93 (1989).

*R.A.V. v. City of St. Paul*, 505 U.S. 377, 382–83 (1992).

Stated another way, defamation is a limit on both freedom of speech and freedom of the press. A person or entity cannot say “I believed what I was saying was true” when the undisputed facts establish those “truths” were known to be false or should have been known to be false by the Defendants and they were spoken with the specific intent to threaten or cause harm to the other person or entity.

The defamatory statements made by Defendants here were not just disagreements with the manner in which the CPS laws are enforced. Instead, the defamatory statements by Defendants were made intentionally to get others to believe “as true” that Plaintiffs and anyone else involved in the CPS investigation and court proceedings or medical treatment of the Infant were committing heinous acts against the Infant, and that St. Luke’s and the other Plaintiffs were “wicked” and “evil” persons such that they should be removed from their professions and the hospital shut down from providing all medical care to anyone in our community. There is no evidence (only baseless allegations by Defendants) of any such conduct by the Plaintiffs or any other party involved in the CPS case involving the Infant. In a court of law, the party claiming truth as a defense must present evidence of truth, and Defendants did not do so.

Here, the Defendants’ statements in every possible form were intentional and with reckless disregard for the truth, fraudulent, malicious and defamatory. As the jury instructions explained, defamation is the injury to one's reputation either by written expression, which is libel, or by oral expression, which is slander. The law is well-established that speech which is defamatory and causes harm is not protected by the First Amendment. As indicated in the above quote from the

Supreme Court, defamation in our common law existed prior to the founding of this country and has been recognized since 1791 by our courts. Further, the mere fact that religious beliefs are cited as motivation for the Defendants' actions does prevent the statements from being defamatory or illegal invasions of another's right to privacy.<sup>6</sup> Nor does the cloak of the Defendants' religious beliefs that the Plaintiffs were "wicked" allow First Amendment protection to the statements such that the statements cannot also be defamatory.

Additionally, the United States Supreme Court recently reaffirmed fraudulent statements made to encourage or induce illegal immigration for financial gain are not protected speech under the First Amendment. *See United States v. Hansen*, 2023 WL 4138994, \_\_\_ U. S. \_\_\_, 143 S.Ct. 1932 (2023). "Speech intended to bring about a particular unlawful act has no social value; therefore, it is unprotected." *Williams*, 553 U.S. at 298, 128 S.Ct. 1830." *Id.* at 1947 (2023). Defendants' conduct in this case included false, fraudulent and defamatory statements made in part for their own financial gain and such speech is not protected. People are free to give money to whatever organizations or persons they want, but they should be informed if the statements to support such donations of monies are not true.

Finally, simply saying a statement over and over does *not* make it true. It is well-established law that a person can tell certain lies and those lies are protected by the First Amendment. *See United States v. Alvarez*, 567 U.S. 709 (2012) where an individual was being criminally prosecuted for falsely claiming to have received a military medal of honor pursuant to the Stolen Valor Act was a content-based restriction on free speech. The difference here is that Defendants' statements were not lies about themselves; they were false, intentional and defamatory statements about others which were intended to hurt Plaintiffs' reputations or businesses. No reasonable person would

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<sup>6</sup> Indeed, the Court cannot to find any religious support for bearing false witness against another.

think these statements were meant for any other purpose than to harm the reputations and to threaten the persons being attacked by such statements. Such statements are not protected speech under the First Amendment.

Listening to and watching the videos of the Defendants and the published written statements of the Defendants Bundy and Rodriguez that claim their belief that “they” had the individual “right” to take the Infant (who is not even their child) back by violence if necessary is a profound misstatement and misunderstanding of the rule of law. In reality, it is a cry for “vigilante justice” which is the act of enforcing the law without legal authority to do so. Vigilante justice does not involve due process and allows one person to be the lawmaker, the law enforcer, the judge and jury without any investigation into the truth. Vigilante justice is not a “right” an individual or group of individuals have in this country.

Laws are passed by duly elected persons through a legislative process involving two representational governmental bodies and then also approved by the executive officer (the President of the United States or the Governor of a state). Laws are enforced by law enforcement officers in the executive branch of government. Challenges to the laws as being facially unconstitutional or unconstitutional as applied are for the judicial branch to decide.

Vigilante justice is not tolerated under the Constitution because it violates the rights of the accused. Vigilante justice expounded by the Defendants is meant to control others not by the rule of law, but by intimidation through threats of violence and the public shaming of others. Defendants clearly believe they are above the law and can operate outside the boundaries of our laws if they disagree with how the laws are being applied. That is not how our government works. A party can appeal a court’s ruling and seek appellate review of a decision. The manner in which

to challenge any court's ruling is not through threat and intimidation. It is through the judicial process.

Moreover, if Defendants want the CPS statutes to be revised or changed, then they can lobby the legislature. While it is unclear exactly what changes to the law the Defendants seek, they are free to propose changes by working directly with legislators to sponsors bills. The Idaho Legislature has a long history of protecting children through the DHW, and nothing in this trial established the procedure approved by the Legislature was not followed or was misapplied based on the true health status of the Infant and the failure of the parents to allow the Infant to be seen for follow-up care. In fact, this case is an example of the CPS system working exactly as intended by the Legislature to protect the well-being of a child.

In several of the published statements by Defendants Bundy and Rodriguez they encouraged their followers to "follow the money" to prove how children are being harmed, trafficked, or kidnapped by CPS. No actual evidence was cited for this proposition by the Defendants and it was proven to be false at trial. Instead, the evidence in this case shows the only money being "made" by the events involving the Infant were St. Luke's and other medical practitioners receiving Medicaid reimbursement for the medical services provided (which was testified to be 70% of the actual cost of the care) and money flowing from donations by Defendants' followers (based on false defamatory statements about the Plaintiffs and others) to Defendants Bundy, Ammon Bundy for Governor, Rodriguez, People's Rights Network, Freedom Man Press LLC and Freedom Man PAC.

If Defendants wanted to present a defense of the "truth" of their statements, they could have participated in this lawsuit or at least the damages trial. They did not. The Court must take the undisputed facts presented at trial as true. Moreover, independent expert medical testimony as

well as common sense establishes the facts were not as Defendants maintained. The actual numerous weights taken of the Infant as well as the results of other medical tests and the pictures of the Infant did not present a healthy infant. Dr. Wheaton testified there was no misdiagnosis or malpractice by the medical providers.

The Court finds St. Luke's did not initiate nor threaten to initiate CPS action. Did St. Luke's become involved after the Infant was taken into the custody of DHW? Yes. However, no child was "kidnapped" by the police or doctors. No child was "trafficked" or abused by DHW, the hospital, the doctors or the courts. Instead, St. Luke's through its staff and medical providers provided the *necessary* medical care the Infant needed (twice) and took care to receive the parents' consent for the care provided even though during the second hospitalization was when the Infant was in the temporary care and custody of DHW. All of the Infant's medical care was covered by Medicaid insurance.

Dr. Whelan testified the need for CPS to get involved was due to the parents' failure to attend follow-up appointments. In making this last statement, the Court does not in any way believe the parents intended to harm the Infant. But the parents did neglect the medically needed follow-up appointments to make sure the Infant was gaining, not losing, weight. New parents have a plan for how they want to care for their child and they are allowed great freedom in implementing their plan, until and unless the child's welfare is at risk. At that point, the DHW has a duty to step in, to get the child the care it needs and then to develop a reunification plan so the child can return to its home and thrive.

### **3. Permanent injunctive relief is appropriate in this case.**

Permanent injunctive relief requiring the Defendants to stop making defamatory statements about the Plaintiffs, to remove defamatory and harassing statements or posts from online locations under the Defendants' control and prohibiting the Defendants from republishing the statements or posts is appropriate in this case. The statements, internet posts, online interviews made as part of a sustained campaign of defamation by Defendants and they continue to threaten or cause actual irreparable harm to the Plaintiffs. Based on the testimony of Mr. Roth, Dr. Erickson, NP Jungman, this conduct not only affects the individual Plaintiffs, but it also affects their families, their co-workers, their work environments. It also continues to negatively impact the reputation of St. Luke's in the community. The Court has no expectation that the defamatory statements will stop by Defendants without a permanent injunction.

This type of conduct can be enjoined by a court. While the Court could not find any on-point Idaho authority for the factual circumstances presented in this case, the Court can look to other jurisdictions for persuasive authority for internet smear campaigns. *See, e.g., Balboa Island Vill. Inn, Inc. v. Lemen*, 40 Cal. 4th 1141, 1155-57 (2007) (holding that the court may issue an injunction prohibiting the defendant from repeating statements judicially determined to be defamatory and rejecting argument that damages are the only remedy for defamation because otherwise the plaintiff would be required to bring a succession of lawsuits for damages which could be insufficient to deter the continuing tortious behavior); *Advanced Training Sys. v. Caswell Equip. Co.*, 352 N.W. 2d 1, 11 (Minn. 1984) (affirming permanent injunctive relief prohibiting republication of material found libelous at trial); *Weitsman v. Levesque*, Case No. 19-CV-461 JLS (AHG), 2020 WL 6825687, (S.D. Cal. Nov. 20, 2020) (applying New York law and collecting New York cases that removal orders are

necessary when parties refuse to depublish); *see also St. James Healthcare v. Cole*, 178 P.3d 696, (Mont. 2008) (affirming in part preliminary injunction against harassing and threatening statements).<sup>7</sup>

In *Weitsman*, the court ordered permanent injunctive relief when the defendant engaged in a “sustained Internet defamation campaign” falsely accusing the plaintiff of child trafficking. *Weitsman*, 2020 WL 6825687. The court entered default against the defendant, and the plaintiff obtained an award of compensatory and punitive damages. *Id.* The defendant had continued making the defamatory statements online, despite the litigation and an arrest warrant. *Id.* A permanent injunction was appropriate due to the intentional, sustained campaign of defamation aimed to injure the plaintiff’s interests, including business interests. *See id.* The injunction was tailored to (1) require the removal of statements held to be defamatory whose postings online were under the defendant’s control; and (2) prohibit the republication of statements held to be defamatory. *See id.*

The Defendants’ actions attacking Plaintiffs in this case were relentless for over a year and with the specific intent to harm the reputations of St. Luke’s and the other named Plaintiffs who did their job to ensure the Infant received necessary medical care. The Defendants continue to the present time in making defamatory statements to others about the Plaintiffs. There is every indication based on the Defendants’ conduct over the prior year that the Defendants will continue to repeat and re-post the defamatory statements if no injunction is entered. The Court recognizes the Defendants have the means to influence thousands of followers, as they quickly organized protestors at the hospitals and across the country to disrupt St. Luke’s business. This ability to mobilize others and to condone violence makes the threatened irreparable harm even more likely.

As several experts testified at trial, that once on the internet, it is difficult to remove defamatory statements from the internet, a simple retraction is inadequate relief for the Plaintiffs. Plaintiffs are entitled by law to have all the Defendants do everything in their power and on all

sites under their control (directly or indirectly) to remove all the judicially determined defamatory statements about the Plaintiffs. Moreover, the Defendants are ordered to stop making new or repeating previously made statements or postings with defamatory statements about the Plaintiffs. Further defamatory statements or invasion of Plaintiffs' privacy regarding the events with the Infant by Defendants could lead to new litigation for defamation. This defamation against the Plaintiffs is not protected by the First Amendment and it must end.

If the defamatory statements are not taken down, they will be repeated and cause more irreparable threatened or actual harm to the Plaintiffs. The Plaintiffs have a right under law to seek injunctive relief from the Court to force the Defendants to stop making and publishing defamatory statements about the Plaintiffs. Plaintiffs followed the rule of law and legal process for having such a remedy ordered by the Court. The Plaintiffs proved the statements were intentional, false and made by Defendants with the specific intent to cause reputational damage to the Plaintiffs and to invade the Plaintiffs' privacy. The Defendants continue to try to raise monies based on the defamatory statements.

#### **4. Scope of injunctive relief.**

The Court, in exercising its discretion, finds a permanent injunction is warranted under the law against the Defendants in this case. The Court exercises its discretion based on the findings of fact and conclusions of law to grant the equitable relief requested. "A permanent injunction requires a showing of threatened or actual irreparable injury." *Hood v. Poorman*, 171 Idaho 176, 519 P.3d 769, 783 (2022) (citing *O'Boskey v. First Fed. Sav. & Loan Ass'n of Boise*, 112 Idaho 1002, 1007, 739 P.2d 301, 306 (1987)). There is a threatened or actual irreparable injury to Plaintiffs if defamatory statements about the care of the Infant and the Plaintiffs are not stopped. The Defendants are aware their statements have been found by a jury and court of law to be

defamatory, so continuing to say the statements are true may expose Defendants to additional legal liability.

Defendants will be ordered to take the following actions to remove all defamatory statements and violations of the privacy of the Plaintiffs. Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

Failure by the Defendants to follow the Order for Permanent Injunctive Relief may lead to contempt proceedings, sanctions and other legal ramifications.

## **Conclusion**

Fortunately for the Infant and our community, the Plaintiffs ignored the actions of the disrupters led by Bundy and Rodriguez and instead made saving the life of the Infant their priority. Plaintiffs St. Luke's and Mr. Roth were not distracted from their mission of providing medical care when needed to any member of our community regardless of a person's ability to pay. St. Luke's followed established medical treatment procedures and DHW followed Court orders, not the demands of the Defendants. Dr. Erickson and NP Jungman followed their oaths to help and not harm their patient. But the disinformation continues by Defendants even after the Infant was returned to its parents by the court through the CPS proceedings, even after the civil lawsuit was filed, and even after the jury verdict was returned.

Defendants' continued disinformation regarding the Plaintiffs does not help our community. The actions and conduct of the Defendants have made our community less safe. Medical providers and other employees are leaving their professions because of the damage to their reputations, the invasion of their privacy, the harassment and threats of intimidation by Defendants. Defendants' conduct and the conduct of their followers selfishly prevented third parties from coming to the St. Luke's hospitals and clinics for care, prevented the family members of other patients from seeing their loved ones at the hospital, disrupted the care of other patients, and threatened the safety of employees due to the sheer noise and intimidation of armed protestors surrounding the Boise hospital. The First Amendment protects and allows citizens to protest, but the First Amendment does not allow armed citizens to attempt to enter the private property of St. Luke's when it was locked down.

The defamatory statements of Defendants against the Plaintiffs have the indirect effect of making it more difficult to attract medical professionals to Idaho. The defamatory statements have

the direct effect of causing highly qualified medical professionals to leave the profession they love due the stress from the intimidation and threats of personal harm by Defendants and their followers. The defamatory statements have the direct effect of making it more difficult for other community members to safely access medical care when needed.

A permanent injunction is warranted and appropriate in this case to stop Defendants from reposting and repeating statements that have been deemed by a jury and the Court to be defamatory and harmful to the reputational interests, privacy interests and emotional health of the Plaintiffs. A retraction by Defendants is insufficient to reverse the continued threat of irreparable harm to the Plaintiffs. Monetary damages, even if they can be collected, are inadequate to protect against further harm to the Plaintiffs or to deter Defendants. In order to avoid the threatened or actual irreparable harm to Plaintiffs reputations, professions, emotional health, the defamatory statements of the Defendants must to be removed from the online sources controlled by Defendants (directly or indirectly) and no longer repeated orally by Defendants.

### **Order**

Based on the Findings of Fact and Conclusions of Law, the injunctive relief requested by the Plaintiffs is appropriate and shall be ordered by the Court in a separate Permanent Injunction Order. Plaintiffs shall submit a proposed Permanent Injunction Order for the Court's review consistent with these Findings of Fact and Conclusions of Law. Plaintiffs are also directed to provide a proposed Default Judgment to be entered consistent with this Order, the jury verdict and previous attorney fees as sanctions ordered by the Court.

IT IS SO ORDERED.

Dated: 8/25/23

  
NANCY A. BASKIN  
District Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/25/23, I caused a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR INJUNCTIVE RELIEF to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following person(s):

Erik F. Stidham (X) Email  
Jennifer M. Jensen  
Zachery J. McCraney  
Alexandra S. Grande  
efstidham@hollandhart.com  
jmjensen@hollandhart.com  
zjmccraney@hollandhart.com  
aehenderson@hollandhart.com  
*Attorney for Plaintiff(s)*

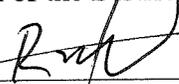
Diego Rodriguez (X) Email  
freedommanpress@protonmail.com  
*Pro Se Defendant*

Ammon Bundy, Ammon Bundy for Governor, (X) Mail  
and People’s Rights Network  
c/o Ammon Bundy  
4615 Harvest Lane  
Emmett ID 83617-3601  
*Pro Se Defendant*

Ammon Bundy for Governor (X) Mail  
And People’s Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett ID 83617  
*Pro Se Defendant*

Freedom Man Press LLC and Freedom Man PAC (X) Mail  
c/o Diego Rodriguez  
1317 Edgewater DR #5077  
Orlando, FL 32804  
*Pro Se Defendant*

TRENT TRIPPLE  
Clerk of the District Court

By   
Deputy Clerk

**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

**DEFAULT JUDGMENT**

JUDGMENT IS ENTERED AS FOLLOWS:

1. Judgment is entered in favor of 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, N.P. against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

2. St. Luke's Health System, Ltd.'s and St. Luke's Regional Medical Center, Ltd.'s damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Nineteen Million One Hundred Twenty-Five Thousand Dollars [Fourteen Million One Hundred Twenty-Five Thousand (\$14,125,000)** in compensatory damages and **Five Million Dollars (\$5,000,000)** in punitive damages].

3. Previously Court-ordered and unpaid attorneys' fees and costs of St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. are awarded against:

- a. Defendant Ammon Bundy in the amount of **Thirteen Thousand Four Hundred Forty-Three Dollars and Twenty-One Cents (\$13,443.21)**;
- b. Defendant Ammon Bundy for Governor in the amount of **Six Thousand Eight Hundred Ninety-Five Dollars and Eighty-Six Cents (\$6,895.86)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. Defendant Freedom Man Press LLC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**;
- e. Defendant Freedom Man PAC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**; and
- f. Defendant People's Rights Network in the amount of **Eight Thousand Three Hundred Thirty-One Dollars and Ninety-Six Cents (\$8,331.96)**.

4. Chris Roth's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Eight Million Five Hundred Thousand Dollars (\$8,500,000)** [Two Million One Hundred Twenty-Five Thousand Dollars

**(\$2,125,000)** in compensatory damages and **Six Million Three Hundred Seventy-Five Dollars (\$6,375,000)** in punitive damages].

5. Natasha Erickson's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

6. Tracy Jungman's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)**] in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

7. Interest shall accrue on all awarded damages bearing the statutory rate of 10.250% per annum until paid in full.

8. Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.

- iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
- iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- viii. St. Luke's reported the parents to Child Protective Services.
- ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
- x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- x. The family was discriminated against because the Infant was not vaccinated.
  - xi. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xii. The parents did not consent to the medical treatment provided to the Infant.
  - xiii. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
  - c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:  
<https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabyCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

- d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
- e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:

<https://www.peoplesrights.org>, <https://www.votebundy.com>,

<https://www.freedomman.org>, <https://stlukesexposed.com>,

<https://www.facebook.com/SaveBabyCyrus/>,

<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>

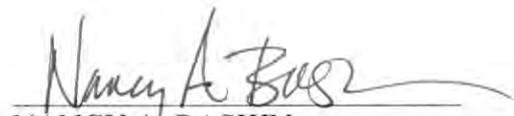
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG.](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG)

- f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

IT IS SO ORDERED.

DATED: 8/29/2023

  
NANCY A. BASKIN  
District Court Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following persons:

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:

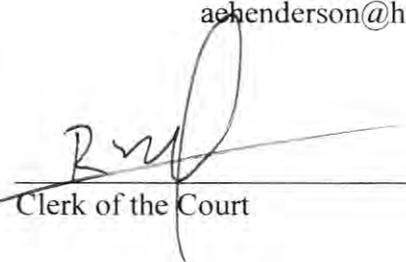
Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

Erik F. Stidham  
Jennifer M. Jensen  
Alexandra S. Grande  
Zachery J. McCraney  
Anne E. Henderson  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto:aehenderson@hollandhart.com)

DATED: 8/29/23

  
\_\_\_\_\_  
Clerk of the Court

**EXHIBIT J**

**VIDEO ON  
THUMB DRIVE**

**EXHIBIT K**

**VIDEO ON  
THUMB DRIVE**

# EXHIBIT L



## DECISION

St. Luke's Regional Medical Center, Ltd. v. Luis Suarez / White Stone Enterprises  
/ Jimmy Rodgers / Domain Administrator / See PrivacyGuardian.org  
Claim Number: FA2402002083881

### PARTIES

Complainant is **St. Luke's Regional Medical Center, Ltd.** ("Complainant"), represented by **Amanda Martson** of **Holland & Hart LLP**, Colorado, USA. Respondent is **Luis Suarez / White Stone Enterprises / Jimmy Rodgers / Domain Administrator / See PrivacyGuardian.org** ("Respondent"), Multiple Locations.

### REGISTRAR AND DISPUTED DOMAIN NAMES

The domain names at issue are **<stlukesexposed.com>**, **<stlukesexposed.net>** and **<stlukesexposed.ws>**, registered with **NameCheap, Inc.** and **NameSilo, LLC**.

### PANEL

The undersigned certifies that he has acted independently and impartially and to the best of his knowledge has no known conflict in serving as Panelist in this proceeding.

Alan L. Limbury, as Panelist.

### PROCEDURAL HISTORY

Complainant submitted a Complaint to FORUM electronically on February 14, 2024. FORUM received payment on February 14, 2024.

On February 16, 2024 and February 19, 2024, NameCheap, Inc. and NameSilo, LLC confirmed by e-mail to FORUM that the **<stlukesexposed.com>**, **<stlukesexposed.net>** and **<stlukesexposed.ws>** domain names are registered with NameCheap, Inc. and NameSilo, LLC and that Respondent is the current registrant of

the names. NameCheap, Inc. and NameSilo, LLC have verified that Respondent is bound by the NameCheap, Inc. and NameSilo, LLC registration agreements and has thereby agreed to resolve domain disputes brought by third parties in accordance with ICANN's Uniform Domain Name Dispute Resolution Policy (the "Policy").

On February 26, 2024, FORUM served the Complaint and all Annexes, including a Written Notice of the Complaint, setting a deadline of March 18, 2024 by which Respondent could file a Response to the Complaint, via e-mail to all entities and persons listed on Respondent's registration as technical, administrative, and billing contacts, and to postmaster@stlukesexposed.com, postmaster@stlukesexposed.net, postmaster@stlukesexposed.ws. Also on February 26, 2024, the Written Notice of the Complaint, notifying Respondent of the e-mail addresses served and the deadline for a Response, was transmitted to Respondent via post and fax, to all entities and persons listed on Respondent's registration as technical, administrative and billing contacts.

Having received no response from Respondent, FORUM transmitted to the parties a Notification of Respondent Default.

On March 19, 2024, pursuant to Complainant's request to have the dispute decided by a single-member Panel, FORUM appointed Alan L. Limbury as Panelist.

Having reviewed the communications records, the Administrative Panel (the "Panel") finds that FORUM has discharged its responsibility under Paragraph 2(a) of the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules") "to employ reasonably available means calculated to achieve actual notice to Respondent" through submission of Electronic and Written Notices, as defined in Rule 1 and Rule 2. Therefore, the Panel may issue its decision based on the documents submitted and in accordance with the ICANN Policy, ICANN Rules, FORUM's Supplemental

Rules and any rules and principles of law that the Panel deems applicable, without the benefit of any response from Respondent.

## **RELIEF SOUGHT**

Complainant requests that the domain names be transferred from Respondent to Complainant.

## **PRELIMINARY ISSUE: MULTIPLE RESPONDENTS**

Paragraph 3(c) of the Rules provides that a “complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder”. Paragraph 1(d) of the FORUM'S Supplemental Rules defines “The Holder of a Domain Name Registration” as “the single person or entity listed in the registration information, as verified by the Registrar, at the time of commencement” and sub-paragraph 1(d)(i) provides that a Complainant wishing to make an argument for a single Respondent having multiple aliases must comply with Supplemental Rules 4(c) and 17(a)(i).

Complainant has shown that the <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names are effectively controlled by the same person and/or entity, which is operating under several aliases.

Hence this decision refers to Luis Suarez / White Stone Enterprises / Jimmy Rodgers / Domain Administrator / See PrivacyGuardian.org as “Respondent”.

## **PARTIES' CONTENTIONS**

### **A. Complainant**

For over 120 years, Complainant, St. Luke's Regional Medical Center, Ltd., its affiliates, licensees, and predecessors-in-interest have provided patient-centered care in an effort to improve the health of people in the communities in which Complainant serves.

Complainant has rights in the ST. LUKE'S mark through trademark registrations with the United States Patent and Trademark Office ("USPTO"). Respondent's <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names are confusingly similar to Complainant's ST. LUKE'S mark.

Respondent lacks rights or legitimate interests in the <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names since Respondent is not affiliated with Complainant in any way and is not licensed or authorized to use Complainant's ST. LUKE'S mark. There is no evidence to suggest that Respondent is commonly known by that name. Additionally, Respondent does not use the domain names for any bona fide offering of goods or services or legitimate noncommercial or fair use. Rather, as determined by the Idaho District Court, Respondent has used the domain names to defame Complainant and other parties and continues to do so in contravention of the court order in an attempt to tarnish Complainant and its mark.

Respondent registered the <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names in bad faith with actual knowledge of Complainant's rights in the ST. LUKE'S mark and uses them in bad faith to attack Complainant and its affiliates and doctors in violation of the law and a court order.

#### B. Respondent

Respondent failed to submit a Response in this proceeding.

### FINDINGS

Complainant has established all the elements entitling it to relief.

### DISCUSSION

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted and in

accordance with the Policy, these Rules and any rules and principles of law that it deems applicable."

Paragraph 4(a) of the Policy requires that Complainant must prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

- (1) the domain name registered by Respondent is identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (2) Respondent has no rights or legitimate interests in respect of the domain name; and
- (3) the domain name has been registered and is being used in bad faith.

In view of Respondent's failure to submit a response, the Panel shall decide this administrative proceeding on the basis of Complainant's undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences it considers appropriate pursuant to paragraph 14(b) of the Rules. The Panel is entitled to accept all reasonable allegations set forth in a complaint; however, the Panel may deny relief where a complaint contains mere conclusory or unsubstantiated arguments. *See* WIPO Jurisprudential Overview 3.0 at ¶ 4.3; *see also eGalaxy Multimedia Inc. v. ON HOLD By Owner Ready To Expire*, FA 157287 (FORUM June 26, 2003) ("Because Complainant did not produce clear evidence to support its subjective allegations [. . .] the Panel finds it appropriate to dismiss the Complaint").

#### **Identical and/or Confusingly Similar**

Complainant has shown that it has rights in the ST. LUKE'S mark through registrations with the USPTO (*e.g.*, Reg. No. 4047459, registered on November 1, 2011). The Panel finds Respondent's <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names to be confusingly similar to Complainant's mark, only differing in each case by the addition of the

word “exposed”, which does nothing to distinguish the domain names from the mark. The inconsequential “.com”, “.net” and “.ws” generic top-level domains (“gTLDs”) may be ignored. See, for example, *Rollerblade, Inc. v. Chris McCrady*, WIPO Case No. D2000-0429.

Complainant has established this element.

### **Rights or Legitimate Interests**

Paragraph 4(c) of the Policy sets out three illustrative circumstances as examples which, if established by Respondent, shall demonstrate rights to or legitimate interests in the domain names for purposes of paragraph 4(a)(ii) of the Policy, *i.e.*

- (i) before any notice to Respondent of the dispute, the use by Respondent of, or demonstrable preparations to use, the domain names or names corresponding to the domain names in connection with a *bona fide* offering of goods or services; or
- (ii) Respondent (as an individual, business or other organization) has been commonly known by the domain names, even if Respondent has acquired no trademark or service mark rights; or
- (iii) Respondent is making a legitimate noncommercial or fair use of the domain names, without intent for commercial gain to misleadingly divert customers or to tarnish the trademark or service mark at issue.

The <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names were registered on May 18, 2022, September 1, 2023 and December 2, 2023 respectively, many years after Complainant registered its ST. LUKE’S mark. The <stlukesexposed.net> and <stlukesexposed.ws> domain names were registered after the entry of a default judgement on August 29, 2023 in the Idaho District Court, which ordered Respondent to cease posting and disseminating and to

remove from all its online locations numerous defamatory statements against Complainant and others. Those statements have been displayed on the websites to which the domain names resolve and continue to be displayed on two of those websites.

These circumstances, together with Complainant's assertions, are sufficient to constitute a *prima facie* showing of absence of rights or legitimate interests in respect of the domain names on the part of Respondent. The evidentiary burden therefore shifts to Respondent to show that it does have rights or legitimate interests in the <stlukeseExposed.com>, <stlukeseExposed.net> and <stlukeseExposed.ws> domain names. See *Neal & Massey Holdings Limited v. Gregory Ricks*, FA 1549327 (FORUM Apr. 12, 2014). Respondent has made no attempt to do so.

The Panel finds that Respondent has no rights or legitimate interests in respect of the domain names.

Complainant has established this element.

#### **Registration and Use in Bad Faith**

Paragraph 4(b) of the Policy sets out four illustrative circumstances, which, though not exclusive, shall be evidence of the registration and use of the domain names in bad faith for purposes of paragraph 4(a)(iii) of the Policy.

The circumstances set out above in relation to the second element satisfy the Panel that Respondent was fully aware of Complainant's ST. LUKE'S mark when Respondent registered the <stlukeseExposed.com>, <stlukeseExposed.net> and <stlukeseExposed.ws> domain names and there is no evidence that the domain names have been registered and used for the purpose of legitimate criticism or review. To the contrary, in the Panel's view, this is a clear-cut case of tarnishment, where the domain names (containing the derogatory term "Exposed") have been

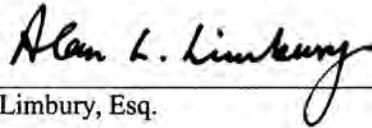
registered and used in bad faith to harm the reputation and disrupt the business of Complainant and its mark.

Complainant has established this element.

## DECISION

Complainant having established all three elements required under the ICANN Policy, the Panel concludes that relief shall be **GRANTED**.

Accordingly, it is Ordered that the <stlukesexposed.com>, <stlukesexposed.net> and <stlukesexposed.ws> domain names be **TRANSFERRED** from Respondent to Complainant.



---

Alan L. Limbury, Esq.  
Arbitrator

Alan L. Limbury, Panelist

Dated: March 20, 2024

# EXHIBIT M

## Baby Cyrus Telegram

BABY CYRUS - OFFICIAL TELEGRAM GROUP

102 members



Pinned message

<https://t.me/peopleagainstchildtrafficking>

April 4

Diego Rodriguez ★

admin

Much to the chagrin of DIRTY ERIK HE/HIM/HIS and his band of nefarious pedophile protectors, the [StLukesExposed.ws](https://StLukesExposed.ws) website has been moved to this new domain: <https://stlukes.exposed>

DR



5:10 PM

Khara Covington Ripley

Well there goes our new banner! Is the Peoples Rights website also at risk?

KR

← 4 5:43 PM

Diego Rodriguez ★

admin

Khara Covington Ripley  
Well there goes our new banner! Is the Peoples Rights website al...

*The long story short is that St. Luke's has utilized some under handed legal tactics to take down the website by forcing the domain name Registrar to give them the domain or face LONG AND EXPENSIVE legal battles. Most Registrars are not willing to fight back for customers who only spend \$20 per year or so for a domain name. So, they just fold—even though there is no legal reason necessary for it. In other words, it's a business decision for these companies and not a legal one.*



6:16 PM

Khara Covington Ripley

Well there goes our new banner! Is the Peoples Rights website al...  
I don't know specifically if People's Rights website is at risk, but I would assume it is. Only time will tell.

DR

6:18 PM

Khara Covington Ripley

But wasn't that the whole point of taking it off shore? So that couldn't happen? What about the new one? Is that going to happen again?

KR

← 2 6:32 PM

# EXHIBIT N



### Warrants

#### 1 Person(s)

As of 9:30 AM on April 22, 2024 Mountain Time , the following people have valid arrest warrants through the Ada County Sheriff's Office for traffic or criminal offenses. Persons having warrants are subject to arrest upon contact by law enforcement officers. This list does not include juvenile offenders.

CAUTION: Misuse of warrant information may subject you to civil or criminal liability. Most warrants issued by the Ada County District Court are available online. This database is updated periodically throughout the day, so recent changes in warrant status may not be reflected here. Remember, only peace officers can arrest a person for a warrant. Questions? Check our FAQ page or call 577-3090 or 577-3091. Information contained herein should not be relied upon for any type of legal action.

Last Name

Bundy

First Name

Ammon

SEARCH

 **Bundy, Ammon Edward**  
Age: 48

Warrant #	Issued	Severity	Bond Amount
CV01-22-06789 - 2A	11/13/2023	M	\$250,000.00

• CONTEMPT OF COURT-CIVIL (OUT OF COURT) - I7-804



**Inside the ACSO:**  
*What do our deputies do?*  
**FIND OUT HERE**

ACCOUNTABLE • CONSISTENT • ADAPTABLE  
 ORGANIZED • COMPASSIONATE • ENERGETIC  
 ENTHUSIASTIC • CONFIDENT • PREPARED  
**WE NEED YOU**  
 ACTIVE • KNOWLEDGEABLE • PROTECTIVE  
 STRONG • GENUINE • INTEGRATOR • HONEST  
 LOGICAL • TRUSTWORTHY • STAND FIRM  
 RESPECTFUL • RESOURCEFUL • RESILIENT

# EXHIBIT O

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

Case No. CV01-22-06789

ST. LUKE'S HEALTH SYSTEM. LTD; ST. )  
LUKE'S REGIONAL MEDICAL CENTER, )  
LTD; CHRIS ROTH, an individual; and )  
NATASHA D. ERICKSON, MD, an )  
individual; and TRACY W. JUNGMAN, NP, )  
an individual, )

Plaintiffs, )

v. )

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. )

BEFORE THE HONORABLE LYNN NORTON

TRANSCRIPT OF PRETRIAL CONFERENCE

June 6, 2023

PAGES: 1 - 32

TRANSCRIBED BY: Susan Sims CSR, RPR

CERTIFIED TRANSCRIPT

A P P E A R A N C E S

For Plaintiffs:

ERIK F. STIDHAM  
Holland & Hart  
800 w. Main Street, Suite 1750  
Boise, ID 83702

1 from him other than an opposition to motion for contempt  
2 and a notice requesting a video appearance.

3 So obviously he knew about today's hearing  
4 because he filed an opposition to the motion to  
5 contempt, but I don't see any witness list, exhibit  
6 list, requested jury instructions, or any pretrial  
7 memorandum filed by Mr. Rodriguez.

8 Mr. Rodriguez has failed to attend the  
9 pretrial conference as was required in the notice of  
10 trial setting. Pursuant to Idaho Rule of Civil  
11 Procedure 16(b), the Court may sanction any party if a  
12 party fails to appear at a scheduling or pretrial  
13 conference or is substantially unprepared to participate  
14 in the scheduling or pretrial conference or fails to  
15 participate in good faith.

16 That rule also permits sanctions, any orders  
17 as are just, and may along with any other sanction make  
18 orders allowed under Rule 37(b)(2)(A). So the Court  
19 will make that determination and any orders in writing.

20 To the extent the motion for contempt was on  
21 for hearing today, Mr. Rodriguez has failed to appear.  
22 He also failed to appear on May 23rd of 2023.

23 Under Idaho Rule of Civil Procedure 75(e), a  
24 warrant of attachment may issue if the Court finds  
25 probable cause to believe that the respondent committed

1 the contempt and determines there's reasonable grounds  
2 to believe that respondent will disregard a written  
3 notice to appear.

4 Mr. Rodriguez has not appeared in any of  
5 these proceedings or hearings since January of 2023. I  
6 do find that there is probable cause in the affidavits  
7 that are actually filed, which is all of that stack, for  
8 this Court to believe that Diego Rodriguez is in  
9 contempt of court for failure to obey the preliminary  
10 injunction order, protective order, and discovery  
11 orders.

12 So with that, I'll sign the warrant of  
13 attachment, set the bond at \$25,000. Once he's picked  
14 up, he'll set a court appearance to appear on the motion  
15 for contempt.

16 I had re-noticed the matters for hearing from  
17 the 23rd, so that included the motion for hearing on  
18 damages before a jury relating to default in Defendant  
19 Ammon Bundy, Ammon Bundy for Governor, and Peoples Right  
20 Network motion for contempt and for sanctions to Peoples  
21 Rights Network and Ammon Bundy for Governor motion for  
22 award of attorneys fees pursuant to Court's April 24,  
23 2023 order. All of those relate to default of  
24 defendants. An order for default has been entered  
25 against all defendants except for Diego Rodriguez.

## REPORTER'S CERTIFICATE

STATE OF IDAHO )

COUNTY OF ADA )

I, SUSAN SIMS, Certified Court Reporter of the County of Ada, State of Idaho, hereby certify:

That I am the reporter who transcribed the proceedings had in the above-entitled action in machine shorthand and thereafter the same was reduced into typewriting under my direct supervision; and that the foregoing transcript contains a full, true, and accurate record of the proceedings had in the above and foregoing cause, which was heard at Boise, Idaho.

IN WITNESS WHEREOF, I have hereunto set my hand.

*Susan Sims*  
 \_\_\_\_\_  
 SUSAN SIMS, CSR-RPR  
 Ada County Courthouse  
 200 West Front Street  
 Boise, Idaho

Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
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](mailto:efstidham@hollandhart.com)  
[rafaucher@hollandhart.com](mailto:rafaucher@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zjmccraney@hollandhart.com](mailto:zjmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto: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

**NOTICE OF HEARING ON  
MOTION FOR CONTEMPT  
AGAINST DIEGO RODRIGUEZ**

PLEASE TAKE NOTICE that Plaintiffs' Motion for Contempt Against Diego Rodriguez will be addressed in front of the Honorable Nancy Baskin on Tuesday, July 16, 2024, at 3:30 p.m. MDT at the Ada County Courthouse, 200 W. Front Street, Boise, ID 83702-7300.

DATED this 9th day of May, 2024.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham  
Robert A. Faucher  
Jennifer M. Jensen  
Zachery J. McCraney  
Anne Henderson Haws

Attorneys for Plaintiffs

## CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2024, I caused the foregoing to be served 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> <a href="mailto:aebundy@bundyfarms.com">aebundy@bundyfarms.com</a>
--	---

Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

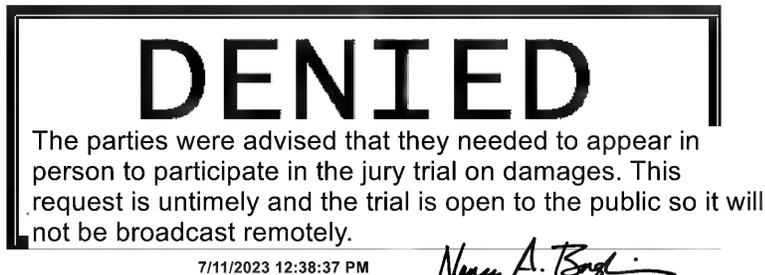
Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> <a href="mailto:freedommanpress@protonmail.com">freedommanpress@protonmail.com</a>
---	---

Freedom Tabernacle, Incorporated Attn: Diego Rodriguez, Registered Agent 1876 E. Adelaide Drive Meridian, ID 83642-9219	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> <a href="mailto:freedommanpress@protonmail.com">freedommanpress@protonmail.com</a>
---	--

/s/ Erik F. Stidham

Erik F. Stidham  
of Holland & Hart LLP

Diego Rodriguez  
1317 Edgewater Drive #5077  
Orlando, FL 32804  
(208) 891-7728



**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

Filed: 07/11/2023 14:17:00  
Fourth Judicial District, Ada County  
Trent Tripple, Clerk of the Court  
By: Deputy Clerk - Nelson, Ric

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

**NOTICE REQUESTING REMOTE  
VIDEO ACCESS TO COURT TRIAL**

COMES NOW Defendant Diego Rodriguez (who may refer to myself as "I,"  
"defendant," or "Rodriguez), defendant in the above mentioned case, hereby move this Court to  
provide me with remote video access to the court trial on July 10<sup>th</sup>, 2023.

DATED: July 9th, 2023

By: /s/ Diego Rodriguez

Diego Rodriguez

**CERTIFICATE OF SERVICE**

I certify I served a copy to: (name all parties or their attorneys in the case, other than yourself)

Erik F. Stidham (ISB #5483)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-5974

By Mail

By fax

By Email/iCourt/eServe

DATED: July 9th, 2023

By: /s/ *Diego Rodriguez*

Diego Rodriguez