

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF MOTION FOR ENTRY
OF DEFAULT AS TO FREEDOM MAN
PRESS LLC AND FREEDOM MAN PAC**

Erik F. Stidham declares and states as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. Defendants Freedom Man Press LLC and Freedom Man PAC (“Freedom Man Defendants”) were served with the Amended Summonses, Summonses by Publication, and Amended Complaint in this matter via Certified Mail on July 15, 2022. *See Exhibit A*, Declarations of Service.

3. The documents were mailed to Freedom Man Press LLC at its last known addresses in Idaho and Florida:

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

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

Exhibit A, Declarations of Service.

4. The documents were mailed to Freedom Man PAC at its last known addresses in Idaho and Florida:

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

Freedom Man PAC
c/o Diego Rodriguez
1876 E. Adelaide Dr.
Meridian, ID 83642

Id.

5. On August 24, 2022, I learned that the Certified Mail sent to the Adelaide address in Meridian, Idaho has been returned as “unclaimed.” *See Exhibit B*, Unclaimed mail.

6. Defendant Freedom Man Press claims to be a limited liability corporation, although it is not registered as such in any state in the United States, and Defendant Freedom Man PAC is a political action committee. Therefore, they cannot be a minor or an incompetent person for default purposes.

7. The Freedom Man Press Defendants are purportedly a limited liability company and a political organization and therefore are not included within the term “servicemember” as that term is defined in 50 U.S.C. § 3911(1). The Servicemembers Civil Relief Act does not apply to the Freedom Man Defendants.

8. Defendant Diego Rodriguez is the Communications and Marketing Director for Freedom Man Press. *See* About Freedom Man Press, <https://www.freedomman.org/about/> (last visited Aug. 29, 2022). The Freedom Man Press website also refers to Freedom Man PAC as an interrelated pro-government organization. *Id.* The Institute for Research and Education for Human Rights recognizes Freedom Man PAC as Mr. Rodriguez’s creation. *See* <https://www.irehr.org/reports/peoples-rights-report/profile-diego-rodriguez/> (last visited Aug. 29, 2022) (referring to “Rodriguez’s Freedom Man Political Action Committee”).

9. The Idaho Secretary of State’s Campaign Finance disclosures identify Diego Rodriguez as the Chairman and Treasurer of Freedom Man PAC. A search for Freedom Man PAC through the Idaho Secretary of State Sunshine Campaign Finance database includes an “About” section. According to this database, Diego Rodriguez is the Chairman and Treasurer of Freedom Man PAC. *See Exhibit C.* In November 2021, Levi Anderson was named as the Treasurer for Freedom Man PAC and has submitted subsequent disclosures. *Id.* It appears as though both Diego Rodriguez and Levi Anderson have responsibility for Freedom Man PAC.

10. The Freedom Man Defendants were served by publication in three separate locations—the Idaho Statesman, the Orlando Sentinel, and the Orlando Weekly. Service was effected in the Idaho Statesman for four consecutive weeks on July 17, July 24, July 31, and August 7, 2022. *See Exhibit D.* Service was effected in the Orlando Sentinel for four consecutive weeks on July 18, July 25, August 1, and August 8, 2022. *See Exhibit E.* Service was effected in the Orlando Weekly for four consecutive weeks on July 27, August 3, August 10, and August 17, 2022. *See Exhibit F.*

11. The Freedom Man Defendants have not responded to the Amended Complaint and more than 21 days have passed since they were served by publication.

12. In addition, Mr. Rodriguez has had actual knowledge of the litigation for months. Mr. Rodriguez posted an article entitled “St[.] Luke’s is Suing Us for Exposing Them” on Freedoman.org on May 16, 2022, stating that he had read the Complaint and was aware that he was named as a Defendant in the litigation. *See* <https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/> (last visited September 8, 2022). In the article, Mr. Rodriguez states that on or about May 11, 2022 he went to a news website where he “downloaded the actual lawsuit (i.e. legal complaint) and read it . . .” Additionally, in the same article, Mr. Rodriguez states that he will publish everything he obtains through discovery in this lawsuit on a website “so that the entire world can see the corruption and wickedness of St. Luke’s . . .” And Mr. Rodriguez closes the article stating, “[w]e’ll see you in court!” *See also Exhibit G* attached hereto (Diego Rodriguez stating that he will lose the lawsuit no matter what evidence he presents because the “odds [are] stacked against [him]”).

13. In a June 2, 2022, interview with the Stew Peters Show, Mr. Rodriguez again acknowledged he was aware of the lawsuit. He stated he was aware of the filings in the case. *See*

Stew Peters Show, Baby Cyrus' Family Sued After CPS Kidnapping: St. Luke's Suing for Defamation, RED VOICE MEDIA (June 2, 2022), (<https://www.redvoicemedia.com/2022/06/baby-cyrus-family-sued-after-cps-kidnapping-st-lukes-suing-for-defamation/>) (5m 33s to 6m). Mr. Rodriguez also acknowledged he was aware of the lawsuit on June 6, 2022, in an interview on the Laura Lynn Tyler Show. *See* @LauraLynnTT, TWITTER (June 6, 2022, 4:12 PM), https://twitter.com/LauraLynnTT/status/1533934970879692800?s=20&t=hE_Lr0nVHfL7Rw6W98iS3A (44m to 46m).

14. Mr. Rodriguez responded to an Idaho Statesman reporter's request for comment regarding this litigation. Mr. Rodriguez texted the reporter stating that he ran away to a foreign country to avoid accountability in this lawsuit. *See* **Exhibit H** (Idaho Statesman Article dated June 30, 2022).

15. On or about July 7, 2022, in an article dated June 30, 2022, Mr. Rodriguez published an article titled "My Response to the Idaho Statesman Regarding the St. Luke's Lawsuit" on the freedomman.org website. <https://www.freedomman.org/2022/my-response-to-the-idaho-statesman-st-lukes-lawsuit/?r=6257> (last visited August 31, 2022). In that article, Mr. Rodriguez again acknowledged the lawsuit and continued to make false statements regarding Plaintiffs, Plaintiffs' counsel, and this Court. Among other things, Mr. Rodriguez boasts that he is dodging service of process. *See* **Exhibit G**.

16. In fact, Mr. Rodriguez attempted to answer the Amended Complaint *pro se* on September 6, 2022. The proposed Answer was rejected for filing deficiencies. Attached hereto as **Exhibit I** is a true and correct notice of rejection of filing for Mr. Rodriguez's proposed Answer.

17. On September 7, 2022, Mr. Rodriguez filed a new Answer. Like his proposed Answer, Mr. Rodriguez's new Answer was filed on behalf of himself only. And like his proposed Answer, his new Answer lists his address as the same address Plaintiffs have been sending filings to.

18. Owing to the Freedom Man Defendants' ongoing efforts to dodge and refusal to acknowledge service, Plaintiffs served the Freedom Man Defendants on multiple occasions in a redundant fashion.

19. The addresses most likely to provide notice of the Default for the Freedom Man Defendants are as follows:

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

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

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

20. As set out in the Amended Complaint filed June 2, 2022, Plaintiffs seek injunctive relief requiring the Freedom Man Defendants to cease posting and disseminating the defamatory statements against Plaintiffs, including, but not limited to, those set out in the Amended Complaint.

21. As set out in the Amended Complaint, Plaintiffs have each been damaged in an amount to be proven but no less than \$50,000.

22. After entry of default, Plaintiffs intend to develop and present evidence to the Court and jury regarding the amount of damages that should properly be awarded against the defaulting Freedom Man Defendants.

23. After entry of default, Plaintiffs intend to move this Court to allow for the assessment of punitive damages against the Freedom Man Defendants. If the Court determines that punitive damages may be presented in this matter, Plaintiffs will take the necessary procedural steps to amend the allegations and will present evidence and argument to the Court and jury regarding appropriate punitive damages.

24. After entry of default, Plaintiffs will move the Court and take appropriate procedural steps to recover reasonable attorney's fees as identified in the Amended Complaint.

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

DATED this 9th day of September, 2022.

/s/ Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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- U.S. Mail
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- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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**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. et al.

Plaintiff(s):

DECLARATION

vs.

Ammon Bundy et al.

Defendant(s):

Case Number: CV01-22-06789

For:

Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

Received by Tri-County Process Serving LLC on July 15, 2022 to be mailed to **FREEDOM MAN PRESS LLC, C/O DIEGO RODRIGUEZ** at 1317 Edgewater Dr., #5077, Orlando, FL 32804.

I, Jenna Balvin, state that on Friday, July 15, 2022, I sent a true copy of the Summons - Publication; Amended Summons; Amended Complaint and Demand for Jury Trial (Unredacted); Amended Complaint and Demand for Jury Trial (Redacted); Motion for a Preliminary Injunction; Memorandum in Support of Motion for a Preliminary Injunction (Redacted); Memorandum in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Chris Roth in Support of Motion for a Preliminary Injunction; Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Redacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Unredacted); Memorandum Decision and Order Granting in Part Motions to Seal; Motion to Expedite Discovery; Memorandum in Support of Motion to Expedite Discovery (Redacted); Memorandum in Support of Motion to Expedite Discovery (Unredacted); Declaration of Erik Stidham in Support of Motion to Expedite Discovery; Amended Order Granting Motion to Expedite Discovery; Motion and Affidavit for Service by Publication; Supplemental Affidavit for Service by Publication; Order for Service by Publication; Motion to Seal (5/11/22); Memorandum in Support of Motion to Seal (5/11/22); Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Memorandum in Support of Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Motion to Seal (6/2/22); Memorandum in Support of Motion to Seal (6/2/22) On Friday, July 15, 2022, at 12:00 AM, I served the within named Freedom Man Press LLC by delivering a true copy of the Summons - Publication; Amended Summons; Amended Complaint and Demand for Jury Trial (Unredacted); Amended Complaint and Demand for Jury Trial (Redacted); Motion for a Preliminary Injunction; Memorandum in Support of Motion for a Preliminary Injunction (Redacted); Memorandum in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Chris Roth in Support of Motion for a Preliminary Injunction; Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Redacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Unredacted); Memorandum Decision and Order Granting in Part Motions to Seal; Motion to Expedite Discovery; Memorandum in Support of Motion to Expedite Discovery (Redacted); Memorandum in Support of Motion to Expedite Discovery (Unredacted); Declaration of Erik Stidham in Support of Motion to Expedite Discovery; Amended Order Granting Motion to Expedite Discovery; Motion and Affidavit for Service by Publication; Supplemental Affidavit for Service by Publication;

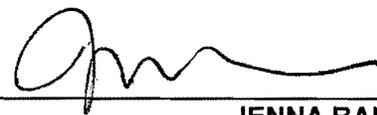
Order for Service by Publication; Motion to Seal (5/11/22); Memorandum in Support of Motion to Seal (5/11/22); Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Memorandum in Support of Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Motion to Seal (6/2/22); Memorandum in Support of Motion to Seal (6/2/22) via certified mail, return receipt requested, to Freedom Man Press LLC c/o Diego Rodriguez at 1317 Edgewater Dr., #5077, Orlando, FL 32804.

I hereby acknowledge that I am a Process Server. I am over the age of eighteen years and not a party to the action. I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

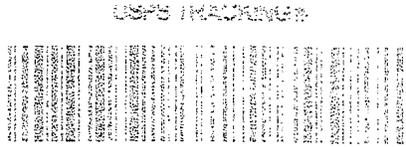
Our Reference Number: 197125
Client Reference: Erik F. Stidham

Wednesday, July 20, 2022

TRI-COUNTY PROCESS SERVING LLC
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132



JENNA BALVIN



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 6533 1028 6497 86

United States
Postal Service

#197121,
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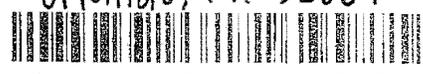
° Sender: Please print your name, address, and ZIP+4® in this box°
TRI-COUNTY PROCESS SERVING LLC
P.O. BOX 1711
BOISE, ID 83701



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Diego Rodriguez; Freedom man
press, LLC; and Freedom man
PAC 1317 Edgewater Dr. #5077
Orlando, FL 32804



9590 9402 6533 1028 6497 86

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 [Signature] Agent
 Addressee

B. Received by (Printed Name) *[Signature]* C. Date of Delivery
[Signature] 7-18-26

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
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 - Adult Signature Restricted Delivery
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 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery over \$500
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

2. Article Number (Transfer from service label)
7022 1670 0001 8038 3949

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
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St. Luke's Health System, Ltd. et al.

Plaintiff(s):

DECLARATION

vs.

Ammon Bundy et al.

Defendant(s):

Case Number: CV01-22-06789

For:

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800 W. Main St., #1750
Boise, ID 83702

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I, Jenna Balvin, state that on Friday, July 15, 2022, at 12:00 AM, I sent a true copy of the **Summons - Publication; Amended Summons; Amended Complaint and Demand for Jury Trial (Unredacted); Amended Complaint and Demand for Jury Trial (Redacted); Motion for a Preliminary Injunction; Memorandum in Support of Motion for a Preliminary Injunction (Redacted); Memorandum in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Chris Roth in Support of Motion for a Preliminary Injunction; Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Redacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Unredacted); Memorandum Decision and Order Granting in Part Motions to Seal; Motion to Expedite Discovery; Memorandum in Support of Motion to Expedite Discovery (Redacted); Memorandum in Support of Motion to Expedite Discovery (Unredacted); Declaration of Erik Stidham in Support of Motion to Expedite Discovery; Amended Order Granting Motion to Expedite Discovery; Motion and Affidavit for Service by Publication; Supplemental Affidavit for Service by Publication; Order for Service by Publication; Motion to Seal (5/11/22); Memorandum in Support of Motion to Seal (5/11/22); Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Memorandum in Support of Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Motion to Seal (6/2/22); Memorandum in Support of Motion to Seal (6/2/22)** On Friday, July 15, 2022, at 12:00 AM, I served the within named **Freedom Man Press LLC** by delivering a true copy of the **Summons - Publication; Amended Summons; Amended Complaint and Demand for Jury Trial (Unredacted); Amended Complaint and Demand for Jury Trial (Redacted); Motion for a Preliminary Injunction; Memorandum in Support of Motion for a Preliminary Injunction (Redacted); Memorandum in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Chris Roth in Support of Motion for a Preliminary Injunction; Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Redacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Unredacted); Memorandum Decision and Order Granting in Part Motions to Seal; Motion to Expedite Discovery; Memorandum in Support of Motion to Expedite Discovery (Redacted); Memorandum in Support of Motion to Expedite Discovery (Unredacted); Declaration of Erik Stidham in Support of Motion to Expedite Discovery; Amended Order Granting Motion to Expedite Discovery; Motion and Affidavit for Service by Publication; Supplemental Affidavit**

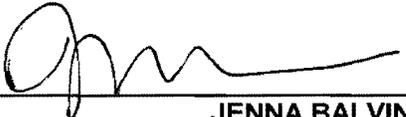
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Our Reference Number: 197124
Client Reference: Erik F. Stidham

Wednesday, July 20, 2022

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P.O. Box 1224
Boise, ID, 83701
(208) 344-4132



JENNA BALVIN

USPS TRACKING #

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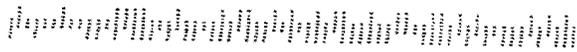
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United States
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Sender: Please print your name, address, and ZIP+4® in this box®
TRI-COUNTY PROCESS SERVING LLC
P.O. BOX 1711
BOISE, ID 83701



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Freedom man press, LLC
 110: DIEGO RODRIGUEZ
 9169 W. STATE ST., # 3177
 BOISE, ID 83714



9590 9402 6533 1028 6497 62

2. Article Number (Transfer from service label)
7022 1670 0001 8038 3925

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery
 Janice B.

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053

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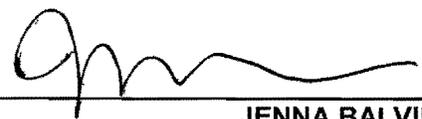
Service by Publication; Motion to Seal (5/11/22); Memorandum in Support of Motion to Seal (5/11/22); Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Memorandum in Support of Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Motion to Seal (6/2/22); Memorandum in Support of Motion to Seal (6/2/22) via certified mail, return receipt requested, to Freedom Man PAC c/o Diego Rodriguez at 1876 E. Adelaide Dr., Meridian, ID 83642.

I hereby acknowledge that I am a Process Server. I am over the age of eighteen years and not a party to the action. I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

Our Reference Number: 197126
Client Reference: Erik F. Stidham

Wednesday, July 20, 2022

TRI-COUNTY PROCESS SERVING LLC
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132



JENNA BALVIN

**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. et al.

Plaintiff(s):

DECLARATION

vs.

Case Number: CV01-22-06789

Ammon Bundy et al.

Defendant(s):

For:

Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

Received by Tri-County Process Serving LLC on July 15, 2022 to be mailed to **FREEDOM MAN PAC, C/O DIEGO RODRIGUEZ** at 1317 Edgewater Dr., #5077, Orlando, FL 32804.

I, Jenna Balvin, state that on Friday, July 15, I sent a true copy of the Summons - Publication; Amended Summons; Amended Complaint and Demand for Jury Trial (Unredacted); Amended Complaint and Demand for Jury Trial (Redacted); Motion for a Preliminary Injunction; Memorandum in Support of Motion for a Preliminary Injunction (Redacted); Memorandum in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Chris Roth in Support of Motion for a Preliminary Injunction; Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Redacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Unredacted); Memorandum Decision and Order Granting in Part Motions to Seal; Motion to Expedite Discovery; Memorandum in Support of Motion to Expedite Discovery (Redacted); Memorandum in Support of Motion to Expedite Discovery (Unredacted); Declaration of Erik Stidham in Support of Motion to Expedite Discovery; Amended Order Granting Motion to Expedite Discovery; Motion and Affidavit for Service by Publication; Supplemental Affidavit for Service by Publication; Order for Service by Publication; Motion to Seal (5/11/22); Memorandum in Support of Motion to Seal (5/11/22); Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Memorandum in Support of Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Motion to Seal (6/2/22); Memorandum in Support of Motion to Seal (6/2/22) On Friday, July 15, 2022, at 12:00 AM, I served the within named Freedom Man PAC by delivering a true copy of the Summons - Publication; Amended Summons; Amended Complaint and Demand for Jury Trial (Unredacted); Amended Complaint and Demand for Jury Trial (Redacted); Motion for a Preliminary Injunction; Memorandum in Support of Motion for a Preliminary Injunction (Redacted); Memorandum in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Erik Stidham in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of Chris Roth in Support of Motion for a Preliminary Injunction; Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted); Declaration of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Unredacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Redacted); Declaration of David Barton in Support of Motion for a Preliminary Injunction (Unredacted); Memorandum Decision and Order Granting in Part Motions to Seal; Motion to Expedite Discovery; Memorandum in Support of Motion to Expedite Discovery (Redacted); Memorandum in Support of Motion to Expedite Discovery (Unredacted); Declaration of Erik Stidham in Support of Motion to Expedite Discovery; Amended Order Granting Motion to Expedite Discovery; Motion and Affidavit for Service by Publication; Supplemental Affidavit for Service by Publication; Order for

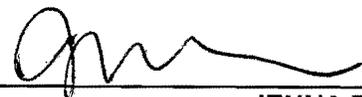
Service by Publication; Motion to Seal (5/11/22); Memorandum in Support of Motion to Seal (5/11/22); Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Memorandum in Support of Motion to Seal Memorandum in Support of Motion to Expedite Discovery; Motion to Seal (6/2/22); Memorandum in Support of Motion to Seal (6/2/22) via certified mail, return receipt requested, to Freedom Man PAC c/o Diego Rodriguez at 1317 Edgewater Dr., #5077, Orlando, FL 32804.

I hereby acknowledge that I am a Process Server. I am over the age of eighteen years and not a party to the action. I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

Our Reference Number: 197127
Client Reference: Erik F. Stidham

Wednesday, July 20, 2022

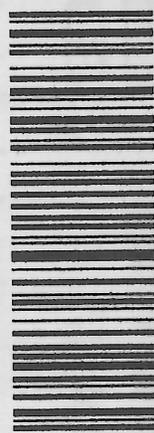
TRI-COUNTY PROCESS SERVING LLC
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132



JENNA BALVIN



7022 1670 0001 8038 3932



FROM: P.O. BOX 1711

BOISE, ID 83701

7/18

not 7-20

TO:
Diego Rodriguez and
Freedom man PAC

-R-T-S-

83714-RFS-1N

08/16/22

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
RETURN TO SENDER



RFS

RFS

Handwritten scribbles and "RFS" markings

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Diego Rodriguez and
Freedom man PAC
1876 E. Adelaide Dr.
Meridian, ID 83642



9590 9402 6533 1028 6497 79

2. Article Number (Transfer from service label)

7022 1670 0001 8038 3932

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

red Mail
red Mail Restricted Delivery
r \$500

1005

83642

R2305K1 32302-15

\$23.35

U.S. POSTAGE PAID
BOISE, ID
83702
JUL 15, 22
AMOUNT



IDAHO

Secretary of State's Office

Home / Campaign Finance /

SEARCH CAMPAIGN FINANCE

MENU

Activity

Activity Dates to 2+ yrs

Search Last: [1 Day](#) [7 Days](#) [30 Days](#) [All](#)

Activity Types

Donations Spending Filing

Dollar Amounts

\$ 1 to \$ 210069.61

Candidates & PACs

Freedom Man PAC

Types Candidates PACs

All Treasurers

Contests (Candidates Only)

Donors & Donations

Vendors & Spending

Reports

SEARCH

[Your Search History](#)

[Clear All Filters](#)

Database last updated: **Today at 4:09 PM**
(Updates occur every 4 hours.)

Freedom Man PAC

Jump to: [Activity](#) [About](#)

Political Action Committee (PAC)

In This Search...

1 Donor gave **\$1,371** to this PAC.

This PAC spent **\$1,371** on **1 Vendor**.

\$1,371

[Donated to Candidates](#)

[Spent by Candidates](#)

[Donated to PACs](#)

[Spent by PACs](#)

17 activity items for this PAC.

Sort:

Download: 

Share:

- 2022 Jul 7 **Freedom Man PAC** filed a **2022 June Report**.
[Show Activity](#)
- 2022 Jun 8 **Freedom Man PAC** filed a **2022 May Report**.
[Show Activity](#)
- 2022 May 9 **Freedom Man PAC** filed a **2022 April Report**.
[Show Activity](#)
- 2022 Apr 9 **Freedom Man PAC** filed a **2022 March Report**.
[Show Activity](#)
- 2022 Mar 9 **Freedom Man PAC** filed a **2022 February Report**.
[Show Activity](#)
- 2022 Feb 9 **Freedom Man PAC** filed a **2022 January Report**.
[Show Activity](#)
- 2022 Jan 10 **Freedom Man PAC** filed a **2021 Annual Report**.
[Show Activity](#)
- 2021 Feb 8 **Freedom Man PAC** filed a **2020 December-Annual Report**.
[Show Activity](#)

- 2020 Dec 9 **Freedom Man PAC** filed a **2020 November Report**.
[Show Activity](#)
- 2020 Nov 12 **Freedom Man PAC** filed a **2020 October Report**.
[Show Activity](#)
- 2020 Oct 5 **Diego Rodriguez** donated **\$687.45** to **Freedom Man PAC**.
- 2020 Oct 5 **Freedom Man PAC** spent **\$271.40** on **Power Marketing** Printing.
- 2020 Oct 5 **Freedom Man PAC** spent **\$416.05** on **Power Marketing** Postage.
- 2020 Oct 3 **Freedom Man PAC** filed a **Treasurer Appointment Report**.
- 2020 Oct 1 **Diego Rodriguez** donated **\$684.16** to **Freedom Man PAC**.
- 2020 Oct 1 **Freedom Man PAC** spent **\$412.76** on **Power Marketing** Postage.

About PAC Freedom Man PAC

Chairman Name

Diego Rodriguez

Mailing Address

**1876 E Adelaide
Meridian ID 83642**

Campaign Status

Terminated

Treasurer Name

Diego Rodriguez



BUSINESS SERVICES

📍 450 N. 4th Street
Boise, ID 83702

✉️ P.O. Box 83720
Boise, ID 83720-0080

☎️ (208) 334-2301

✉️ business@sos.idaho.gov
(mailto:business@sos.idaho.gov)

✉️ ntaa@sos.idaho.gov
(mailto:NTAA@sos.idaho.gov)

☎️ (208) 334-3191 (UCC)

✉️ ucc@sos.idaho.gov
(mailto:UCC@sos.idaho.gov)

🕒 **HOURS:**
Monday —
Friday 8 a.m. to 5 p.m.

Corporations, LLCs and ABNs
(//sos.idaho.gov/business-services-..)



ELECTIONS AND ADMINISTRATION

📍 700 W. Jefferson St., Room E205
Boise, ID 83702

✉️ P.O. Box 83720
Boise, ID 83720-0080

☎️ (208) 334-2852 (elections)

✉️ elections@sos.idaho.gov
(mailto:elections@sos.idaho.gov)

🕒 **HOURS:**
Monday —
Friday 8 a.m. to 5 p.m.
Closed daily —
12 p.m. to 1 p.m.

Secretary of State
(mailto:sosinfo@sos.idaho.gov)

Elections, Campaign Finance, and Lobbyist
(mailto:elections@sos.idaho.gov)

Government Services
(mailto:govsvcs@sos.idaho.gov)



MAIN PHONE NUMBER

(208) 334-2300
(//SOS.IDAHO.GOV/TEL:+12083342300)

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HELPFUL LINKS

Privacy Policy
(//sos.idaho.gov)



APPOINTMENT AND CERTIFICATION OF POLITICAL TREASURER FOR CANDIDATE

C-1

PURSUANT TO IDAHO CODE §67-6603(C1)

No contribution shall be received or expenditure made by or on behalf of a candidate or political committee until he or she appoints a political treasurer and certifies the name and address of the treasurer to the Secretary of State.

CANDIDATE INFORMATION

Name of Candidate or Committee

Freedom Man PAC

Office Sought

District Number

Party

Candidate Mailing Address

Street Address

3400 E River Valley St

City

Meridian

State

ID

Zip Code

83646

I, Levi Anderson, hereby certify and appoint the following individual who is a registered elector of the state of Idaho as the political treasurer for the above named candidate or committee:
(Name of Candidate)

TREASURER INFORMATION

Name of Political Treasurer

Levi Anderson

Treasurer Mailing Address

Street Address

3400 E River Valley St

City

Meridian

State

ID

Zip Code

83646

CERTIFICATION

Signature of Candidate

Levi Anderson

I, Levi Anderson, do hereby accept the appointment as political treasurer for the above named candidate.
(Name of Political Treasurer)

Signature of Political Treasurer

Levi Anderson

Date Signed

11/11/2021



Beaufort Gazette
 Belleville News-Democrat
 Bellingham Herald
 Bradenton Herald
 Centre Daily Times
 Charlotte Observer
 Columbus Ledger-Enquirer
 Fresno Bee

The Herald - Rock Hill
 Herald Sun - Durham
 Idaho Statesman
 Island Packet
 Kansas City Star
 Lexington Herald-Leader
 Merced Sun-Star
 Miami Herald

el Nuevo Herald - Miami
 Modesto Bee
 Raleigh News & Observer
 The Olympian
 Sacramento Bee
 Fort Worth Star-Telegram
 The State - Columbia
 Sun Herald - Biloxi

Sun News - Myrtle Beach
 The News Tribune Tacoma
 The Telegraph - Macon
 San Luis Obispo Tribune
 Tri-City Herald
 Wichita Eagle

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
102169	291093	Print Legal Ad - IPL0081710		\$156.71	1	84 L

Attention: Erik Stidham
 HollandHart
 800 West Main Street Suite 1750
 Suite 1750
 Boise, ID 83702

IN THE DISTRICT COURT
 OF THE FOURTH JUDICIAL
 DISTRICT OF THE STATE OF
 IDAHO, IN AND FOR THE COUN-
 TY OF ADA

**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,

vs.

**AMMON BUNDY an individual;
 AMMON BUNDY FOR GOV-
 ERNOR, a political organiza-
 tion; 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
 Summons by Publication (Free-
 dom Man Press LLC)
 Judge Lynn Norton**

**SUMMONS - PUBLICATION
 To: Freedom Man Press LLC**

You have been sued by St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP, Plaintiffs, in the District Court in and for Ada County, Idaho, Case No. CV01-22-06789.

The nature of the claims against you are: defamation; invasion of privacy; intentional infliction of emotional distress; unfair business practices; wrongful charitable solicitations; and civil conspiracy to commit defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, and wrongful charitable solicitations.

Any time after 21 days following the last publication of this summons, the court may enter a judgment against you without further notice, unless prior to that time you have filed a written response in the proper form, including the Case No., and paid any required filing fee to the Clerk of the Court at Ada County Courthouse, 200 West Front Street, Boise, Idaho 83702 (208) 287-6900 and served a copy of your response on the Plaintiffs' attorney at Holland & Hart LLP, 800 West Main Street, Suite 1750, Boise, ID 83702 (208) 342-5000.

A copy of the Summons and Amended Complaint can be obtained by contacting either the Clerk of the Court or the attorney for Plaintiffs. If you wish legal assistance, you should immediately retain an attorney to advise you in this matter.

Dated: 7/13/22
 PHIL McGRANE
 ADA COUNTY District Court (seal)
 By /s/ Erin Rowell
 Deputy Clerk
 Erik F. Stidham,
 Holland & Hart LLP,
 800 West Main Street, Suite 1750,
 Boise, ID 83702
 (208) 342-5000
 IPL0081710
 Jul 17,24,31, Aug 7 2022

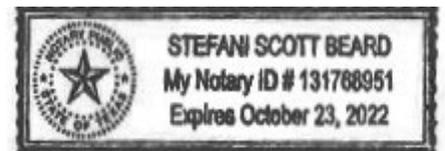
Bettina Jantzen, being duly sworn, deposes and says: That she is the Principal Clerk of The Idaho Statesman, a daily newspaper printed and published at Boise, Ada County, State of Idaho, and having a general circulation therein, and which said newspaper has been continuously and uninterruptedly published in said County during a period of twelve consecutive months prior to the first publication of the notice, a copy of which is attached hereto: that said notice was published in The Idaho Statesman, in conformity with Section 60-108, Idaho Code, as amended, for:

No. of Insertions: 4
 Beginning Issue of: 07/17/2022
 Ending Issue of: 08/07/2022

(Legals Clerk)

On this 8th day of August in the year of 2022 before me, a Notary Public, personally appeared before me Bettina Jantzen known or identified to me to be the person whose name subscribed to the within instrument, and being by first duly sworn, declared that the statements therein are true, and acknowledged to me that she executed the same.

Notary Public in and for the state of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
 Legal document please do not destroy!



Beaufort Gazette
 Belleville News-Democrat
 Bellingham Herald
 Bradenton Herald
 Centre Daily Times
 Charlotte Observer
 Columbus Ledger-Enquirer
 Fresno Bee

The Herald - Rock Hill
 Herald Sun - Durham
 Idaho Statesman
 Island Packet
 Kansas City Star
 Lexington Herald-Leader
 Merced Sun-Star
 Miami Herald

el Nuevo Herald - Miami
 Modesto Bee
 Raleigh News & Observer
 The Olympian
 Sacramento Bee
 Fort Worth Star-Telegram
 The State - Columbia
 Sun Herald - Biloxi

Sun News - Myrtle Beach
 The News Tribune Tacoma
 The Telegraph - Macon
 San Luis Obispo Tribune
 Tri-City Herald
 Wichita Eagle

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
102169	291092	Print Legal Ad - IPL0081709		\$151.33	1	81 L

Attention: Erik Stidham
 HollandHart
 800 West Main Street Suite 1750
 Suite 1750
 Boise, ID 83702

IN THE DISTRICT COURT
 OF THE FOURTH JUDICIAL
 DISTRICT OF THE STATE OF
 IDAHO, IN AND FOR THE COUN-
 TY OF ADA

**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,**

vs.

**AMMON BUNDY an individual;
 AMMON BUNDY FOR GOV-
 ERNOR, a political organiza-
 tion; 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
 Summons by Publication (Free-
 dom Man PAC)
 Judge Lynn Norton**

**SUMMONS - PUBLICATION
 To: Freedom Man PAC**

You have been sued by St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP, Plaintiffs, in the District Court in and for Ada County, Idaho, Case No. CV01-22-06789.

The nature of the claims against you are: defamation; invasion of privacy; intentional infliction of emotional distress; and civil conspiracy to commit defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, and wrongful charitable solicitations.

Any time after 21 days following the last publication of this summons, the court may enter a judgment against you without further notice, unless prior to that time you have filed a written response in the proper form, including the Case No., and paid any required filing fee to the Clerk of the Court at Ada County Courthouse, 200 West Front Street, Boise, Idaho 83702 (208) 287-8900 and served a copy of your response on the Plaintiffs' attorney at Holland & Hart LLP, 800 West Main Street, Suite 1750, Boise, ID 83702 (208) 342-5000.

A copy of the Summons and Amended Complaint can be obtained by contacting either the Clerk of the Court or the attorney for Plaintiffs. If you wish legal assistance, you should immediately retain an attorney to advise you in this matter.

Dated: 7/13/22
 PHIL McGRANE

ADA COUNTY District Court (seal)
 By: /s/Erin Rowell, Deputy Clerk
 Erik F. Stidham,
 Holland & Hart LLP,
 800 West Main Street, Suite 1750,
 Boise, ID 83702
 (208) 342-5000
 IPL0081709
 Jul 17,24,31, Aug 7 2022

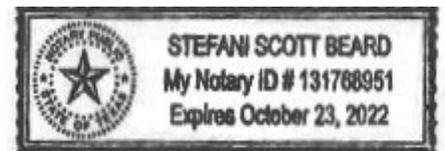
Bettina Jantzen, being duly sworn, deposes and says: That she is the Principal Clerk of The Idaho Statesman, a daily newspaper printed and published at Boise, Ada County, State of Idaho, and having a general circulation therein, and which said newspaper has been continuously and uninterruptedly published in said County during a period of twelve consecutive months prior to the first publication of the notice, a copy of which is attached hereto: that said notice was published in The Idaho Statesman, in conformity with Section 60-108, Idaho Code, as amended, for:

No. of Insertions: 4
 Beginning Issue of: 07/17/2022
 Ending Issue of: 08/07/2022

(Legals Clerk)

On this 8th day of August in the year of 2022 before me, a Notary Public, personally appeared before me Bettina Jantzen known or identified to me to be the person whose name subscribed to the within instrument, and being by first duly sworn, declared that the statements therein are true, and acknowledged to me that she executed the same.

Notary Public in and for the state of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
 Legal document please do not destroy!

Published Daily
ORANGE County, Florida

Sold To:

Holland & Hart LLP - CU80146464
800 West Main St., Suite 1750
Boise, ID 83702

Bill To:

Holland & Hart LLP - CU80146464
800 West Main St., Suite 1750
Boise, ID 83702

State Of Florida
County Of Orange

Before the undersigned authority personally appeared
Rose Williams, who on oath says that he or she is a duly authorized
representative of the ORLANDO SENTINEL, a DAILY newspaper
published in ORANGE County, Florida; that the attached copy of
advertisement, being a Legal Notice in:

The matter of 11170-Suit Notices
Was published in said newspaper by print in the issues of, or by publication
on the newspaper's website, if authorized on Jul 18, 2022; Jul 25, 2022;
Aug 01, 2022; Aug 08, 2022.

Affiant further says that the newspaper complies with all legal requirements
for publication in Chapter 50, Florida Statutes.



Rose Williams

Signature of Affiant

Name of Affiant

Sworn to and subscribed before me on this 9 day of August, 2022,
by above Affiant, who is personally known to me (X) or who has produced identification ().



Signature of Notary Public



Name of Notary, Typed, Printed, or Stamped

7252355

SUMMONS - PUBLICATION

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; and 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

Summons by Publication (Freedom
Man Press LLC)
Judge Lynn Norton
Summons - Publication To: Freedom
Man Press LLC

You have been sued by St. Luke's
Health System, Ltd., St. Luke's
Regional Medical Center, Ltd., Chris
Roth, Natasha D. Erickson, M.D., and
Tracy W. Jungman, NP, Plaintiffs,
in the District Court in and for Ada
County, Idaho, Case No. CV01-22-06789.

The nature of the claims against you
are: defamation; invasion of privacy;
intentional infliction of emotional
distress; unfair business practices;
wrongful charitable solicitations; and
civil conspiracy to commit defamation,
invasion of privacy, intentional
infliction of emotional distress,
trespass, unfair business practices,
and wrongful charitable solicitations.

Any time after 21 days following the
last publication of this summons, the
court may enter a judgment against
you without further notice, unless prior
to that time you have filed a written
response in the proper form, including
the Case No., and paid any required
filing fee to the Clerk of the Court at
Ada County Courthouse, 200 West Front
Street, Boise, Idaho 83702 (208) 287-6900
and served a copy of your response on
the Plaintiffs' attorney at Holland &
Hart LLP, 800 West Main Street, Suite
1750, Boise, ID 83702 (208) 342-5000.

A copy of the Summons and Amended
Complaint can be obtained by
contacting either the Clerk of the
Court or the attorney for Plaintiffs. If
you wish legal assistance, you should
immediately retain an attorney to
advise you in this matter.

Dated: 7/13/22

PHIL McGRANE
ADA COUNTY DISTRICT COURT
(seal)

By: /s/ Erin Rowell

Deputy Clerk

Erik F. Stidham, Holland & Hart LLP,
800 West Main Street, Suite 1750, Boise,
ID 83702 (208) 342-5000

08/01/2022/ 08/08/2022 7252355

7252355

Published Daily
ORANGE County, Florida

Sold To:

Holland & Hart LLP - CU80146464
800 West Main St., Suite 1750
Boise, ID 83702

Bill To:

Holland & Hart LLP - CU80146464
800 West Main St., Suite 1750
Boise, ID 83702

State Of Florida
County Of Orange

Before the undersigned authority personally appeared
Rose Williams, who on oath says that he or she is a duly authorized
representative of the ORLANDO SENTINEL, a DAILY newspaper
published in ORANGE County, Florida; that the attached copy of
advertisement, being a Legal Notice in:

The matter of 11170-Suit Notices
Was published in said newspaper by print in the issues of, or by publication
on the newspaper's website, if authorized on Jul 18, 2022; Jul 25, 2022;
Aug 01, 2022; Aug 08, 2022.

Affiant further says that the newspaper complies with all legal requirements
for publication in Chapter 50, Florida Statutes.



Rose Williams

Signature of Affiant

Name of Affiant

Sworn to and subscribed before me on this 9 day of August, 2022,
by above Affiant, who is personally known to me (X) or who has produced identification ().



Signature of Notary Public



Name of Notary, Typed, Printed, or Stamped

7252357

SUMMONS - PUBLICATION

IN THE DISTRICT COURT OF THE
FOURTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR
THE COUNTY OF ADA

ST. LUKE'S HEALTH SYSTEM, LTD;
ST. LUKE'S REGIONAL MEDICAL
CENTER, LTD; CHRIS ROTH, an
individual; NATASHA D. ERICKSON,
MD, an individual; and TRACY
W. JUNGMAN, NP, an individual,
Plaintiffs,

vs.

AMMON BUNDY, an individual;
AMMON BUNDY FOR GOVERNOR,
a political organization; DIEGO
RODRIGUEZ, an individual;
FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM
MAN PAC, a registered political action
committee; and PEOPLE'S RIGHTS
NETWORK, a political organization,
Defendants.

Case No. CV01-22-06789

Summons by Publication (Freedom
Man PAC)
Judge Lynn Norton
Summons - Publication To: Freedom
Man PAC

You have been sued by St. Luke's
Health System, Ltd., St. Luke's
Regional Medical Center, Ltd., Chris
Roth, Natasha D. Erickson, M.D., and
Tracy W. Jungman, NP, Plaintiffs,
in the District Court in and for Ada
County, Idaho, Case No. CV01-22-06789.

The nature of the claims against you
are: defamation; invasion of privacy;
intentional infliction of emotional
distress; and civil conspiracy to
commit defamation, invasion of
privacy, intentional infliction of
emotional distress, trespass, unfair
business practices, and wrongful
charitable solicitations.

Any time after 21 days following the
last publication of this summons, the
court may enter a judgment against
you without further notice, unless prior
to that time you have filed a written
response in the proper form, including
the Case No., and paid any required
filing fee to the Clerk of the Court at
Ada County Courthouse, 200 West Front
Street, Boise, Idaho 83702 (208) 287-6900
and served a copy of your response on
the Plaintiffs' attorney at Holland &
Hart LLP, 800 West Main Street, Suite
1750, Boise, ID 83702 (208) 342-5000.

A copy of the Summons and Amended
Complaint can be obtained by
contacting either the Clerk of the
Court or the attorney for Plaintiffs. If
you wish legal assistance, you should
immediately retain an attorney to
advise you in this matter.

Dated: 7/13/22

PHIL McGRANE
ADA COUNTY DISTRICT COURT
(seal)

By: /s/Erin Rowell
Deputy Clerk

Erik F. Stidham, Holland & Hart LLP,
800 West Main Street, Suite 1750, Boise,
ID 83702 (208) 342-5000

08/01/2022/ 08/08/2022 7252357

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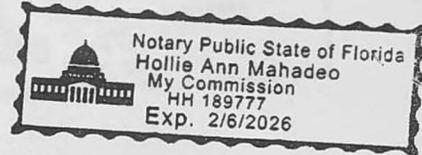


PROOF OF PUBLICATION
ORLANDO, FLORIDA
ORANGE COUNTY, SEMINOLE COUNTY, OSCEOLA COUNTY

In the Matter of : CV01-22-06789 Erik F. Stidham (ISB #5483) HOLLAND & HA...
First Publication: 7/27/2022
Last Publication: 8/17/2022
PROOF OF PUBLICATION
STATE OF FLORIDA
COUNTY OF ORANGE, SEMINOLE, OSCEOLA

Before me, the undersigned authority, personally appeared Michael Wagner, who on oath says that he is the Publisher of the Orlando Weekly, a weekly newspaper published at Orlando, in Orange County, Florida; that the attached copy of the advertisement was published weekly in the regular and entire edition of said newspaper in the issues of :

- 7/27/2022
8/3/2022
8/10/2022
8/17/2022



Affiant further says that the Orlando Weekly is a newspaper published in Orlando in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Seminole County, and Osceola County, Florida, each week for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission of refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me by
Michael Wagner, who is personally known to me, this 17th day of August, 2022

Hollie Mahadeo (Notary Public)

Erik F. Stidham (ISB #5483) HOLLAND & HART LLP, 800 W. Main Street, Suite 1750 Boise, ID 83702-5974 Telephone: 208.342.5000 Facsimile: 208.343.8869 E-mail: estidham@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 Case No. CV01-22-06789 Judge Lynn Norton SUMMONS - PUBLICATION 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. JUNG-MAN, 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. TO: FREEDOM MAN PAC You have been sued by St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP Plaintiffs, in the District Court in and for Ada County, Idaho, Case No. CV01-22-06789. The nature of the claims against you are: defamation; invasion of privacy; intentional infliction of emotional distress; and civil conspiracy to commit defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, and wrongful charitable solicitations. Any time after 21 days following the last publication of this summons, the court may enter a judgment against you without further notice, unless prior to that time you have filed a written response in the proper form, including the Case No., and paid any required filing fee to the Clerk of the Court at Ada County Courthouse, 200 West Front Street, Boise, Idaho 83702 (208) 287-6900 and served a copy of your response on the Plaintiffs' attorney at Holland & Hart LLP, 800 West Main Street, Suite 1750, Boise, ID 83702 (208) 342-5000. A copy of the Summons and Amended Complaint can be obtained by contacting either the Clerk of the Court or the attorney for Plaintiffs. If you wish legal assistance, you should immediately retain an attorney to advise you in this matter. DATED 7/27/2022. CLERK OF THE DISTRICT COURT Phil McGrane By/ s/ Eric Rowell, Deputy Clerk.



PROOF OF PUBLICATION
ORLANDO, FLORIDA
ORANGE COUNTY, SEMINOLE COUNTY, OSCEOLA COUNTY

In the Matter of : CV01-22-06789 Erik F. Stidham (ISB #5483) HOLLAND & HA...
First Publication: 7/27/2022
Last Publication: 8/17/2022

PROOF OF PUBLICATION
STATE OF FLORIDA
COUNTY OF ORANGE, SEMINOLE, OSCEOLA

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Affiant further says that the Orlando Weekly is a newspaper published in Orlando in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Seminole County, and Osceola County, Florida, each week for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission of refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me by
Michael Wagner, who is personally known to me, this 17th day of August, 2022

Hollie Mahadeo (Notary Public)

Erik F. Stidham (ISB #5483) HOLLAND & HART LLP 800 W. Main Street, Suite 1750 Boise, ID 83702-5974 Telephone: 208.342.5000 Facsimile: 208.343.8869 E-mail: estidham@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 Case No. CV01-22-06789 Judge Lynn Norton SUMMONS - PUBLICATION 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. JUNG-MAN, 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. TO: FREEDOM MAN PRESS LLC You have been sued by St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP, Plaintiffs, in the District Court in and for Ada County, Idaho, Case No. CV01-22-06789. The nature of the claims against you are: defamation; invasion of privacy; intentional infliction of emotional distress; unfair business practices; wrongful charitable solicitations; and civil conspiracy to commit defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, and wrongful charitable solicitations. Any time after 21 days following the last publication of this summons, the court may enter a judgment against you without further notice, unless prior to that time you have filed a written response in the proper form, including the Case No., and paid any required filing fee to the Clerk of the Court at Ada County Courthouse, 200 West Front Street, Boise, Idaho 83702 (208) 287-6900 and served a copy of your response on the Plaintiffs' attorney at Holland & Hart LLP, 800 West Main Street, Suite 1750, Boise, ID 83702 (208) 342-5000. A copy of the Summons and Amended Complaint can be obtained by contacting either the Clerk of the Court or the attorney for Plaintiffs. If you wish legal assistance, you should immediately retain an attorney to advise you in this matter. DATED 7/27/2022. CLERK OF THE DISTRICT COURT Phil McGrane By/s/ Eric Rowell, Deputy Clerk.



My Response to the Idaho Statesman Regarding the St. Luke's Lawsuit

My Response to the Idaho Statesman Regarding the St. Luke's Lawsuit

June 30th, 2022 | by Diego Rodriguez

Yesterday I received another text message from an Idaho Statesman reporter about news reports regarding the lawsuit from St. Luke's hospital against me and Ammon Bundy. Here is what the text said (actual screenshot):

6/29/22, 4:24 PM

Hi Diego, I'm working on a story about the St Luke's lawsuit. They hospital says they've made efforts to serve you, but that they haven't been able to locate you. They also said the state has entered a tax lien against you. Would you like to comment on the lawsuit?

Obviously, a newspaper article is only going to pick and choose certain statements to publish (not necessarily nefariously, but there's only so much room available in any given article), so I wanted to give you the entirety of my response here:

First of all, you can bet your bottom dollar that there will be NO REAL JUSTICE in any lawsuit against me or any other liberty minded individual in Ada County. Ada County is bought and paid for by Idaho's "deep state" which is a general cabal made up of Idaho's corrupt politicians, IACI, and other nefarious characters—all of which get their power and money by force—stealing from Idaho's citizens by way of Idaho State Government.

Both recent and past history have demonstrated that there is NO JUSTICE in Ada County. Period. Ammon Bundy was wrongfully prosecuted and found guilty, as well as Casey Baker, Aaron Von Schmidt and untold numbers of innocent Idaho citizens. The details of their court cases demonstrate gross constitutional violations on the part of judges and law enforcement, including at least one police officer who was forced to come back to the courthouse to recant his testimony after evidence was presented that he LIED UNDER OATH, and at least one judge denying Ammon Bundy the right to mention the Constitution in his own case. Any inquisitive citizen can find the details themselves—though the average citizen is too busy or too indifferent to care.

St. Luke's has also hired the Holland and Hart law firm which is the same law firm who has been involved in untold numbers of corrupt actions against the citizens of Idaho, all to enrich themselves. They have been the law firm who have taken hundreds of thousands (probably millions) of dollars from Idaho Citizens from payments they received directly from the Idaho State government. They got paid from Butch Otter, NonBinary Brad Little, and hoards of other state government politicians and corrupt state agencies.

They were the law firm who gave the "legal opinions" that were used to prop up fake and unlawful lockdowns during the COVID scam of 2020 and 2021. Now they have been hired by St. Luke's who also gets millions of dollars of funding from government—meaning that they again are taking money forcefully from the people. In short, by taking taxpayer dollars, essentially stealing from the people, they now have essentially unlimited funds to fight against me until the end of time.

So there will be no justice in this case other than PUBLIC EXPOSURE. With the odds stacked against me, it will not matter what evidence is presented at this court trial—I will lose. I accept that.

Nevertheless, I will do everything in my power to expose the corruption of St. Luke's Hospital and the Holland and Hart law firm. Their actions in Idaho over the course of decades have been unprincipled, corrupt, indefensible, and are direct attacks on the soul and conscience of the Idaho public.

They are suing me for publicly declaring **FACTUAL ACTIONS** that they have done/taken. Well, that is quite a waste of everyone's time because I am happy to publicly recant any single statement I have made and to publish retractions and/or to delete any previous articles or statements about St. Luke's hospital if they can demonstrate **ONE SINGLE, SOLITARY FACTUAL INACCURACY** that I have stated or published. It is as simple as that—no lawsuit necessary.

They can't and won't do that—because I have not made any false statements about them. On the other hand, they have lied repeatedly about me and my family and the entire Baby Cyrus case and this will be demonstrated both in and outside of the courtroom.

The truth is they are suing me as a means of intimidation—to demonstrate their power and to make me an example to anyone and everyone else who would dare challenge the power structure of Idaho.

As far as them not being able to serve me properly, well I can't hold that against them as I have been out of the country and I am now a resident of another country where I will be for any future hearings anyway. But I am both happy and willing to participate in all court hearings via Zoom which is the means by which Idaho courts forced Idaho citizens to use during the COVID scam anyway.

I do find it remarkable that they are claiming to not be able to get a hold of me—with all of their limitless resources. Yet Ian Stevenson, a singular individual reporter from the Idaho Statesman was able to do so within a few hours. Sounds to me like they're not trying very hard, or they're just lying.

And as for the state entering a tax lien against me as a result of this lawsuit—I don't know anything about it, but I wouldn't be shocked. It would just go to show **AGAIN** how corrupt and vile the Idaho court system is—how they could enter a judgment against me for a civil lawsuit where I have not been served, where no evidence has been presented, and where no court hearings have been held. That is called **INJUSTICE**, and it is par for the course in the State of Idaho.

NOTE - the reporter later clarified that the tax lien mentioned was not as a result of this lawsuit.

DIEGO RODRIGUEZ

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Where's Ammon Bundy? St. Luke's sued him for 'smear campaign.' Then this happened

Idaho Statesman

Ian Max Stevenson

June 30, 2022, 10:03 AM

Gubernatorial candidate Ammon Bundy and a close associate, Diego Rodriguez, have not cooperated with a defamation lawsuit filed against them by St. Luke's Health System, according to court documents.

Lawyers for St. Luke's have been unable to locate Rodriguez and serve him, while Bundy has been served but has not responded to the lawsuit, according to the documents.

And despite the litigation, both Rodriguez and Bundy have continued to make the kind of accusations the hospital system sued over, and which it asked an Ada County Court to require the two men to cease doing.

In May, St. Luke's sued alleging that Rodriguez and Bundy orchestrated a coordinated campaign to mislead followers about the circumstances of a child welfare case during an effort to get back custody of Rodriguez's grandson. The state took custody of the young child after authorities said they believed the child's weight-loss could be life-threatening.

The family disputed that, which led Rodriguez and Bundy to embark on a sustained publicity blitz, attacking the hospital — where the baby was briefly held for medical treatment — for “child trafficking” and other alleged crimes. The lawsuit vehemently denied the claims, calling the accusations a “knowingly dishonest and baseless smear campaign” aimed at furthering both of their political careers and earning money.

Bundy, who is running as an independent candidate and is known for far-right armed standoffs with law enforcement, sent out mass messages to his group of activists, called the People's Rights Network. [Multiple protests](#) were held outside of the hospital in Boise. On March 11, the night that local police took custody of Rodriguez's grandson, Bundy was arrested at the St. Luke's Meridian hospital for [misdemeanor trespassing](#).

Protesters went to the homes of government officials involved in the case and published information about those involved online.

On May 12, a process server gave legal papers to Bundy and a campaign staffer in Emmett, where Bundy lives. Since then, neither Bundy nor any lawyer on his behalf has filed responses in court.

Bundy did not respond to a text message request from the Idaho Statesman for comment.

The lawsuit accuses Bundy, his campaign, the People's Rights Network, Rodriguez and associated entities of defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, violating of the Idaho Charitable Solicitation Act and civil conspiracy to commit defamation.

St. Luke's also told the court it quickly needed information about organizations linked to the two men: the People's Rights Network and Freedom Man PAC, a political action committee controlled by Rodriguez.

Ada County District Judge Lynn Norton granted the health system's request on June 3, ordering Bundy to respond to the questions within 14 days, according to court documents.

That did not happen.

On June 24, an attorney for the hospital, Erik Stidham, of the firm Holland & Hart, said in a filing that Bundy had not responded to the court's order "in any way," a document said. The attorney asked the court to sanction Bundy and to require him to sit for a deposition or hold him in contempt.

Bundy has spoken about the lawsuit in the press, stating in an interview that the lawsuit is “an opportunity to further expose them because they are pretty wicked,” Stidham’s filing said.

An amended summons, filed by the Ada County clerk, said that the court could enter judgment against Bundy and the People’s Rights Network if the parties fail to respond to the lawsuit.

The latest filings were first reported by the [Idaho Capital Sun](#).



Ammon Bundy, the far-right candidate for governor of Idaho, has not responded to St. Luke’s lawsuit against him. The health system has asked a court to sanction him.

Rodriguez also hasn’t responded

A process server attempted to serve Rodriguez with the lawsuit at four addresses in Meridian but could not locate him. The server also conducted “surveillance” at Bundy campaign fundraising event in Meridian in an attempt to locate Rodriguez. He was not there.

In an affidavit, Stidham said that “It appears that Mr. Rodriguez may no longer reside in Idaho.”

The attorney also noted that the state has filed a “significant tax lien” against Rodriguez, which the attorney said “creates concern that Mr. Rodriguez has left the state to avoid legal proceedings.”

A record of the lien, secured by the Idaho State Tax Commission and filed on Nov. 30, shows it amounted to \$138,393.

Since the lawsuit was filed, Rodriguez has written posts on his website about the activity, saying the health system is suing for his efforts at “exposing” the hospital and its “very wicked hands.”

“It’s not that he’s not aware of (the lawsuit), he’s just purposefully trying to avoid engaging with the process,” Stidham told the Statesman by phone.

In a text message, Rodriguez told the Statesman that he is living in another country, and he accused the hospital and law firm representing them of corruption and lying.

“I have been out of the country and I am now a resident of another country where I will be for any future hearings,” he said. “But I am both happy and willing to participate in all court hearings via Zoom.”

Rodriguez did not say what country he has moved to. He previously told the Statesman he was moving to Florida.

He accused the Holland & Hart firm of “untold numbers of corrupt actions against the citizens of Idaho,” for actions related to work done for current and prior government officials.

He also said he has not made any false statements about the actions of the hospital or others involved in his grandson’s child welfare case, but he believes he will lose in court.

“With the odds stacked against me, it will not matter what evidence is presented at this court trial – I will lose. I accept that,” he said.

In an email, Stidham said it is time for Rodriguez to participate in the legal proceedings.

“While dodging the legal process, Mr. Rodriguez continues to manufacture baseless, incoherent conspiracy theories about the hospital, the state government, and law firms,” he said. “The time has come for Mr. Rodriguez to stop running away from accountability.”

St. Luke’s has filed a motion asking for service by publication, which would mean publishing a summons to Rodriguez in a local newspaper.

A hearing on that motion, as well as the request to sanction Bundy, is scheduled to be held on July 12.

From: no-reply@efilingmail.tylertech.cloud
To: [Sara M. Berry](#)
Subject: Notification of Returned Service for Case: CV01-22-06789, St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman Plaintiff,vs.Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedo...
Date: Wednesday, September 7, 2022 4:51:02 PM

External Email



Filing Returned

Case Number: CV01-22-06789
Case Style: St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman Plaintiff,vs.Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man PAC, Peoples Rights Network, Freedom Man Press LLC Defendant.

The filing below, previously served to you, has been returned to the filer for further action.

Return Reason(s) from Clerk's Office	
Returned Reason	Incorrect / Incomplete Information: Please resubmit using correct Party Names on doc(s)
Return Comments	Multiple defendant's are missing from your caption. Please be sure the parties names match the Amended Complaint. Also, a filing fee of \$136 is required as well as a Civil Case Information Sheet to file. Please correct and resubmit. Thank you. BRJ *Please Note that if you are requesting your original filing date you must re-submit it within 3 business days of your original filing date and it MUST include a comment requesting the original file date per Rule 13 (c) of Idaho Rules for Electronic Filing and Service*

Document Details	
Court	Ada County
Case Number	CV01-22-06789
Case Style	St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman Plaintiff,vs.Ammon Bundy, Ammon Bundy for

	Governor, Diego Rodriguez, Freedom Man PAC, Peoples Rights Network, Freedom Man Press LLC Defendant.
Date/Time Submitted	9/6/2022 2:18 PM MST
Activity Requested	Answer
Filed By	Diego Rodriguez

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