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pro se

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT

STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

| | | |
|--|---|-------------------------------|
| ST. LUKE'S HEALTH SYSTEM, LTD, et al., |) | |
| ST.LUKE'S REGIONAL MEDICAL |) | CASE NO. CV01-22-06789 |
| CENTER,LTD; CHRIS ROTH, an individual; |) | |
| NATASHA D. ERICKSON, MD, an |) | |
| individual; and TRACY W. JUNGMAN, NP, |) | DEFENDANT'S RESPONSES TO |
| an individual, |) | PLAINTIFFS SECOND SET OF |
| |) | INTERROGATORIES TO DEFENDANT |
| Plaintiffs, |) | DIEGO RODRIGUEZ |
| |) | |
| vs. |) | |
| |) | |
| AMMON BUNDY, an individual; |) | |
| AMMONBUNDY FOR GOVERNOR, a |) | |
| political organization; DIEGO RODRIGUEZ, |) | |
| an individual; FREEDOM MAN PRESS LLC, |) | |
| a limited liability company; FREEDOM |) | |
| MANPAC, a registered political action |) | |
| committee; and PEOPLE'S RIGHTS |) | |
| NETWORK, apolitical organization, |) | |
| |) | |
| Defendants. |) | |
| |) | |

TO: PLAINTIFFS AND THEIR COUNSEL OF RECORD

COMES NOW Diego Rodriguez, Defendant in the above-entitled action, and, in
accordance with the requirements of Rules 33, 34, and 36 of the Idaho Rules of Civil Procedure,
hereby serves his response to Plaintiffs' Second Set of Interrogatories and Request for

**DEFENDANT'S RESPONSES TO PLAINTIFFS SECOND SET OF INTERROGATORIES TO
DEFENDANT DIEGO RODRIGUEZ – 1**

Production of Documents and Request for Admissions.

GENERAL OBJECTIONS

1. Defendant objects to the Requests to the extent they purport to impose burdens, obligations or requirements in excess of those permitted by the Idaho Rules of Civil Procedure or any other statute, rule or order applicable to this proceeding.

2. Defendant objects to the Requests to the extent they are vague, ambiguous, not susceptible to a reasonable interpretation, overly broad, or impose an undue burden on Defendant.

3. Defendant objects to the Requests to the extent they seek information or documents protected by any applicable privilege, immunity or privacy right, including but not limited to the attorney-client privilege, work product doctrine, common interest privilege, or any other applicable privilege, immunity or privacy right, or which are developed in anticipation of or in preparation for litigation. Nothing contained in these Responses is intended to be, nor should be construed as, a waiver of any such privilege. To the extent that any privileged or protected information or material is inadvertently provided in these Responses, such disclosure shall not constitute a waiver of the privilege or protection afforded such information, and Plaintiffs shall immediately return or destroy, without further inspection, any such information upon request.

4. Defendant objects to the “relevant time” period as defined and scope of the Requests as defined.

5. The General Objections asserted above shall be deemed applicable to and continuing with respect to any Request responded to below. The General Objections asserted above are incorporated into the Responses set forth herein. Such objections are not waived, nor are they in any way limited, by any Response to any Request.

6. I reserve the right to supplement any of these responses.

INTERROGATORIES

INTERROGATORY NO. 6: Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

ANSWER TO INTERROGATORY NO. 6:

Diego Rodriguez
Levi Anderson
Marissa Anderson
Miranda Chavoya
Detective Jeff Fuller (address and telephone number unknown to me right now)
Detective Steve Hansen (address and telephone number unknown to me right now)
Dr. Natasha Erickson (address and telephone number unknown to me right now)
Tracy Jungman (address and telephone number unknown to me right now)
St. Luke's CEO, Chris Roth (address and telephone number unknown to me right now)

INTERROGATORY NO. 7: Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to these discovery requests.

ANSWER TO INTERROGATORY NO. 7: I, Diego Rodriguez, alone am responding to these discovery requests.

INTERROGATORY NO. 8: Please identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

ANSWER TO INTERROGATORY NO. 8: I have yet to interview anybody. I reserve the right to supplement this response.

INTERROGATORY NO. 9: Please identify all witnesses You may call to testify at the

trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

ANSWER TO INTERROGATORY NO. 9: I don't know who I will call to testify yet.

But don't worry, that list will be coming.

INTERROGATORY NO. 10: If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

ANSWER TO INTERROGATORY NO. 10: I will notify you as soon as I have people who I know will be called upon to testify.

INTERROGATORY NO. 11: If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

ANSWER TO INTERROGATORY NO. 11: I admit that I have no idea what this even means.

INTERROGATORY NO. 12: Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu

of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

ANSWER TO INTERROGATORY NO. 12: I have no insurance coverage for any of the claims made against me.

INTERROGATORY NO. 13: Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

ANSWER TO INTERROGATORY NO. 13: While it is true that Ammon and I have had multiple conversations in regards to the Baby Cyrus case, this lawsuit, the fake pandemic, the tyranny of St. Luke's and the corruption of Idaho State government, there is no way to identify when or where we had those conversations.

INTERROGATORY NO. 14: Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

ANSWER TO INTERROGATORY NO. 14: I have posted an article regarding this lawsuit on the website, FreedomMan.org, which can be seen here:

<https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>

INTERROGATORY NO. 15: Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People's Rights Network.

ANSWER TO INTERROGATORY NO. 15: The People's Rights Network is not an organization in the way in which you describe it. It is simply a network of individuals who communicate with one another regarding issues of freedom and liberty. To that end, the People's Rights Network has a simple text and email messaging system that can be accessed and used by certain individuals in various geographical regions around the state. I personally did not use the People's Rights network messaging system in neither the Baby Cyrus case nor this lawsuit against me. However, I am aware that other members of the People's Rights Network did send out messages regarding the Baby Cyrus case, but I am not aware of anything having been sent out regarding this lawsuit.

INTERROGATORY NO. 16: Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 16: There are none. Everything I have done in connection with this lawsuit has been published in public forums by me, Diego Rodriguez, using my true and legal name, Diego Rodriguez, and has all been published on the website, FreedomMan.org.

INTERROGATORY NO. 17: Please identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 17: My personal cell phone and personal laptop computer are the only devices which would have been used for any communication regarding this lawsuit.

INTERROGATORY NO. 18: Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

ANSWER TO INTERROGATORY NO. 19: The only methods used were the FreedomMan.org website, my own email list, and my own personal contact list used to send text messages to people I know personally.

INTERROGATORY NO. 19: Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

ANSWER TO INTERROGATORY NO. 19: All of the public appearances can be found here: <https://www.freedomman.org/cyrus/interviews-and-media/>

INTERROGATORY NO. 20: Please Identify any evidence, records, communications, correspondence, or other documents that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

ANSWER TO INTERROGATORY NO. 20: The evidence that supports the statements and accusations made in Section 114 are:

1. The published federal law known as the Adoptive Safe Families Act.
2. Idaho's State Statutes regarding Child Protective Services and the Child Protection Act.
3. Idaho Department of Health and Welfare's published budget records.
4. Various comments and statements made by patients of St. Luke's both in online comments and in person.
5. Statistical data published by IDHW regarding "child protective services."
6. Personal conversation with people who had their child killed by St. Luke's.
7. News articles demonstrating St. Luke's malpractice and incompetence resulting in the deaths of babies (i.e. <https://www.ktvb.com/article/news/local/st-lukes-explains-babys-death/416460574>)
8. Personal conversations with Levi and Marissa Anderson, baby Cyrus's parents.

INTERROGATORY NO. 21: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs committed a crime."

ANSWER TO INTERROGATORY NO. 21: The plaintiffs knowingly took Baby Cyrus and kept him in their custody when they knew and were 100% aware of the fact that Baby Cyrus was not in "imminent danger. This has been published in their own medical records for Baby Cyrus and can be seen here: <https://www.freedomman.org/cyrus/story/>

INTERROGATORY NO. 22: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs are incompetent at

their trade or profession.

ANSWER TO INTERROGATORY NO. 22: Here is an article that shows that St. Luke's hospital killed a baby due to incompetence: <https://www.ktvb.com/article/news/local/st-lukes-explains-babys-death/416460574>. Here is a personal testimony from an Idaho father who had his child killed by St. Luke's hospital: <https://www.freedomman.org/cyrus/press-conferences/> (March 14th press conference). Don't worry, more is coming. Much more!

INTERROGATORY NO. 23: Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations You own or control.

ANSWER TO INTERROGATORY NO. 23: I have ownership and control of Power Marketing Consultants, LLC, registered in Idaho.

INTERROGATORY NO. 24: Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 24: I have control over the following websites:

Freedomman.org

DiegoRodriguez.org

INTERROGATORY NO. 25: Please Identify all websites that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

ANSWER TO INTERROGATORY NO. 25: The only website used to communicate information regarding the Baby Cyrus case is: FreedomMan.org.

INTERROGATORY NO. 26: Please Identify all applications, including, but not limited

to messaging applications or social media platforms like Telegram, MeWe, Rumble, and Gab, that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

ANSWER TO INTERROGATORY NO. 26: The only messaging application used to post information regarding the Baby Cyrus case is Telegram. My username on Telegram is @Diego Rodriguez.

INTERROGATORY NO. 27: Please Identify all aliases, nicknames, or pseudonyms You have used from January 1, 2022, to the present. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

ANSWER TO INTERROGATORY NO. 27: I publish articles on the FreedomMan.org website under the alias/pseudonym “Gunner Steele.” However, all posts regarding the Baby Cyrus case have all been published using my real legal name, Diego Rodriguez.

INTERROGATORY NO. 28: Please Identify the total amount of money or other things of value donated to, raised by, received by, or collected by You or Your Immediate Family, including any business entity owned or controlled by You or Your Immediate Family, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item of value donated to You and/or the amount of money donated to each Immediate Family member, state how that money was collected, and state how that money is being spent or will be spent.

ANSWER TO INTERROGATORY NO. 28: I have not received a single solitary cent from any money raised by the Baby Cyrus case. Period.

INTERROGATORY NO. 29: Please Identify any records, communications,

correspondence, or other documents that indicate the amount of money charged to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 29: That is none of my business. That information is private information for Baby Cyrus's parents.

INTERROGATORY NO. 30: Please Identify any records, communications, correspondence, or other documents that indicate the amount of liability incurred by the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 30: This again, is none of my business. Baby Cyrus is my grandson, not my son, and I do not have any legal guardianship, control, or responsibility for him.

INTERROGATORY NO. 31: Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 31: As previously stated, this is none of my business.

INTERROGATORY NO. 32: Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 32: This is a repeat of interrogatory 31.

INTERROGATORY NO. 33: Please Identify all documents that You intend to rely on in the defense of this lawsuit.

ANSWER TO INTERROGATORY NO. 33: I will rely on the following documents in defense of the lawsuit:

1. St. Luke's medical records showing the fact that they knew and were aware that Baby Cyrus was not in "imminent danger."
2. Bodycam footage from the Meridian Police department showing that both the police, doctors, and IDHW knew that Baby Cyrus was not in imminent danger.
3. The clearly defined and stated Idaho State Statutes in regards to Child Protection that show that the Meridian Police Department broke the law when taking Baby Cyrus.
4. The publicly available data showing how much money the state of Idaho receives for kidnapping children on an annual basis.
5. Testimonies and affidavits from other families who have been abused by both IDHW and St. Luke's.
6. Publicly available data showing how much money St. Luke's has received over the years for receiving children who have been forcibly kidnapped by Idaho police agencies, and how much money Dr. Natasha Erickson, Chris Roth, and Tracy Jungman have personally earned as a result of it.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: There are none other than

the contents of the publicly accessible website, FreedomMan.org.

REQUEST FOR PRODUCTION NO. 2: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: I have not decided what documents I will use as exhibits at trial but I may use the information found here:

<https://www.freedomman.org/cyrus/story/>

REQUEST FOR PRODUCTION NO. 3: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: I have not decided what documents I will use as exhibits at trial but I may use the information found here:

<https://www.freedomman.org/cyrus/story/>

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, including, but not limited to emails, text messages, communications, or other ESI, which relate to the subject matter of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: I don't know what ESI is, but the documents that I am currently aware that will be used are the medical records provided by St. Luke's which you can find at the link above.

REQUEST FOR PRODUCTION NO. 5: Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network or freedomman.org.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: There is nothing related to

this lawsuit. Everything that concerns this lawsuit has already been published and remains LIVE and visible at FreedomMan.org/cyrus.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: These have already been provided in the links above.

REQUEST FOR PRODUCTION NO. 7: Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: I am unaware of any responsive documents to this request.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents provided by You to any expert retained by You to form any opinions related to the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: As stated previously, I currently have not retained any expert witnesses. I reserve the right to supplement this response.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents considered or relied upon by any expert retained by You to form any opinions related to the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9: As stated previously, I currently have not retained any expert witnesses. I reserve the right to supplement this response.

REQUEST FOR PRODUCTION NO. 10: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of

this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10: I currently have not retained any specific lay witnesses. I reserve the right to supplement this response.

REQUEST FOR PRODUCTION NO. 11: Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11: There are none.

REQUEST FOR PRODUCTION NO. 12: Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12: The videos that I am aware of can be found here: <https://www.freedomman.org/cyrus/interviews-and-media/>

REQUEST FOR PRODUCTION NO. 13: Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13: All of these emails referenced have been compiled into a ZIP file which you can access here:

<https://www.freedomman.org/pdf/cyrus-emails.zip>.

REQUEST FOR PRODUCTION NO. 14: Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, you sent or received related to any public appearance or livestreaming event you participated in or interview

you gave where you discussed or talked about the events related to this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14: These are all available here: <https://www.freedomman.org/cyrus/interviews-and-media/>.

REQUEST FOR PRODUCTION NO. 15: Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 16: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between You and any Defendant in this lawsuit, including all present and former agents and employees of any Defendant, that relate to the matters set forth in the Complaint or Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 17: Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17: The PDF copy can be found here: <https://www.freedomman.org/pdf/PMC-Assumed-Business-Name.pdf>.

REQUEST FOR PRODUCTION NO. 18: Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18: There are none.

REQUEST FOR PRODUCTION NO. 19: Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

RESPONSE TO REQUEST FOR PRODUCTION NO. 19: I have already provided this information for Power Marketing Consultants, LLC above.

REQUEST FOR PRODUCTION NO. 20: Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any entity owned, operated, or controlled by You.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20: There is no organizational chart, there is simply me.

REQUEST FOR PRODUCTION NO. 21: Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, and any other business or entity through which you generate income, express ideas, or interact with the public.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21: There is no Freedom Man Press, LLC. Freedom Man Press is simply the name I use for my blog/website which is at FreedomMan.org. The Freedom Man PAC was in existence from about 2014 through 2022, but has been dissolved as of 2022 (once we moved out of state). However, neither FreedomMan.org nor Freedom Man PAC has received a single cent of revenue from outside sources. They do not

generate income, on the contrary they cost me personal money in order to publish and maintain.

REQUEST FOR PRODUCTION NO. 22: Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Ammon Bundy or any entity or association owned or controlled by Ammon Bundy, including but not limited to the People Rights Network and Abish-Husbondi, Inc.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22: There are none.

REQUEST FOR PRODUCTION NO. 23: Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23: I object. That is private information not relevant to this case.

REQUEST FOR PRODUCTION NO. 24: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24: I don't know what this means. But there is nothing relevant to this case that has not already been provided or published publicly.

REQUEST FOR PRODUCTION NO. 25: Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: "Baby Cyrus" or "Cyrus" or "St. Luke's" or "Erickson" or "Roth" or "Jungman" or "kidnapping" or "crime" or "trafficking" including any misspellings of the same.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25: All emails regarding the Baby Cyrus case have already been provided in RFP #13 above.

REQUEST FOR PRODUCTION NO. 26: Please produce all documents or communications You received or sent asking others to call, text, email, protest, or otherwise

disrupt or interfere with St. Luke's operations.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36: These have already been provided in RFP #13 above.

REQUEST FOR PRODUCTION NO. 27: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27: These have already been provided in RFP #13 above.

REQUEST FOR PRODUCTION NO. 28: Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28: Those that I am currently aware of have already been identified with links provided in interrogatory #22 above.

REQUEST FOR PRODUCTION NO. 29: Please produce all video or audio recordings relating to any encounter You had with police or DHW on March 11, 2022, including any recordings taken when police visited Your house.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29: You can access these videos on the following link:

<https://www.dropbox.com/sh/yladfqhiz26fodd/AAAMl2s3mxW0ZgP-62-Y2jBNa?dl=0>.

REQUEST FOR PRODUCTION NO.30: Please produce all organizational documents relating to the People Against Child Trafficking organization (P.A.C.T.) See.

<https://freedomman.org/cyrus/pact-rally/>.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30: There is no formal

organization. It does not exist.

REQUEST FOR PRODUCTION NO. 31: Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held or attended between March 11, 2022, to the present that relates in any way to the events of this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31: The Keynote presentation can be downloaded here: <https://www.freedomman.org/pdf/PACT-RALLY.pdf>.

REQUEST FOR PRODUCTION NO. 32: Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32: There is no such thing as P.A.C.T. It is just the name we used for a rally we held to bring awareness to child trafficking.

REQUEST FOR PRODUCTION NO. 33: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to any Person between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People's Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 34: To the extent not produced in response to

the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that requested donations or support relating in any way to the events described in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 35: Please produce all documents showing money or funds or things of financial value donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the donor, amount of donation, date of donation, and any messages received with the donation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35: This is private information not connected to me. The link from FreedomMan.org sent people to a GiveSendGo.com campaign which was hosted and controlled by GiveSendGo and was created by a 3rd party, Rick Green.

REQUEST FOR PRODUCTION NO. 36: Please produce all documents showing the disposition, transfer, or use of money or funds donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the person or entity receiving the funds, the date the person or entity received the funds, and the amount of the funds.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36: There are and were no donations received on the FreedomMan.org website. There was only a link from the FreedomMan.org website to the GiveSendGo.com donation page set up for Baby Cyrus and his family.

REQUEST FOR PRODUCTION NO. 37: Please produce all documents and records,

including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People's Rights Network, Abish-husbondi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37: Ammon Bundy is buying my RV from me and has been making payments to me for the purchase of the RV. There are no records of any agreements because it is a simple man-to-man agreement we've made with one another.

REQUEST FOR PRODUCTION NO. 38: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 39: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any "Patriot" as that term is used in Defendant Ammon Bundy's September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39: There are none that I am

aware of.

REQUEST FOR PRODUCTION NO. 40: Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People's Rights Network.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40: There is no membership in the People's Rights Network. If you want to "join" you simply text your "Rights" to 80123 and you get added to the list. It is just like subscribing to an email list. To that end, I am on the list and have been since its inception.

REQUEST FOR PRODUCTION NO. 41: Please produce all documents and communications received from any "whistleblowers" as discussed in your April 29, 2022 article on freedomman.org entitled "Insider Information from a Whistleblower!"

RESPONSE TO REQUEST FOR PRODUCTION NO. 41: The communications received from whistleblowers were deleted for privacy purposes at the end of April 2022. As a member of the Press, it is my duty to protect my sources.

REQUEST FOR PRODUCTION NO. 42: Please produce all documents demonstrating or showing the changes or updates to the freedomman.org website from March 1, 2022 through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42: There are no change logs which show or demonstrate changes or updates to the FreedomMan.org website as it is built on the Rapidweaver platform and such logs do not exist. However, updates and changes can easily be seen by simply using the publicly available WayBack machine, where changes and updates can easily be seen here: https://web.archive.org/web/20220101000000*/freedomman.org

REQUEST FOR PRODUCTION NO. 43: Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43: There are none that I am aware of.

REQUEST FOR PRODUCTION NO. 44: Please produce copies of any and all registered copyrights that You or any entity under Your control have including, but not limited to, any registered copyright associated with the freedomman.org website or any registered copyright associated with the contact@freedomman.org email account.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44: The entire website is protected by U.S. copyright law.

REQUEST FOR PRODUCTION NO. 45: To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or
3. Upon which You will rely to support any of the allegations or defenses set forth in

Your Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45: There are none that I am aware of.

DATED this 7th day of November, 2022.

By: /s/ Diego Rodriguez
Diego Rodriguez
Defendant

VERIFICATION

Diego Rodriguez, being first duly sworn upon oath, deposes and says that he has read the foregoing DEFENDANT’S RESPONSES TO PLAINTIFFS SECOND SET OF INTERROGATORIES TO DEFENDANT DIEGO RODRIGUEZ, and that the statements therein contained are true.

By: /s/ Diego Rodriguez
Diego Rodriguez
Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th day of November, 2022, I caused to be served a true and accurate copy of the foregoing document upon the following attorney(s) by the method indicated:

| | |
|--|--|
| Erik F. Stidham HOLLAND & HART LLP 800 W. Main Street, Suite 1750 Boise, ID 83702 | <input type="checkbox"/> U.S. Mail, postage pre-paid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Facsimile (208) 954-5950 <input checked="" type="checkbox"/> iCourt: efstidham@hollandhart.com |
|--|--|

/s/ Diego Rodriguez
Diego Rodriguez
Defendant