

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 MOTIONS FOR  
LEAVE TO AMEND COMPLAINT TO  
ALLEGE PUNITIVE DAMAGES**

**FILED UNDER SEAL**

Erik F. Stidham declares and states as follows:

1. I am counsel of record for Plaintiffs ("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. Attached hereto as **Exhibit 1** is a true and correct copy of a document downloaded at my direction from <https://sosbiz.idaho.gov/search/business/>, the Articles of Incorporation (Non-Profit) for Freedom Tabernacle, Incorporated.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a document downloaded at my direction from <https://sos.wyo.gov>, the Wyoming Secretary of State Business Division Filing Information for Abish-husbondi Inc., Profit Corporation.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a document downloaded at my direction from <https://sos.wyo.gov>, the Wyoming Secretary of State Business Division Filing Information for Dono Custos, Inc., Profit Corporation.

5. Attached hereto as **Exhibit 4** are true and correct copies of screenshots taken at my direction from <https://sos.idaho.gov/elections-division/campaign-finance-filing/>, the Secretary of State campaign finance filings page.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a screenshot taken at my direction from <https://sosbiz.idaho.gov/search/ucc>.

7. Attached hereto as **Exhibit 6** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

8. Attached hereto as **Exhibit 7** is a true and correct copy of a webpage downloaded at my direction from <https://www.peoplesrights.org/.../baby-wronfully-torn-from-arms-of-mother-in-meridian-idaho>.

9. Attached hereto as **Exhibit 8** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to

Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

10. Attached hereto as **Exhibit 9** is a true and correct copy of a video downloaded at my direction from

[https://www.facebook.com/northidahoex/posts/270635855250547?locale=ne\\_NP&paipv=0&eav=AfaueZ2fdorjxlv33sUCx8ffaiTa7YTLDq6jaQwdAUo65pIQBE3LwyjVtycS1Szz2WA&\\_rdr](https://www.facebook.com/northidahoex/posts/270635855250547?locale=ne_NP&paipv=0&eav=AfaueZ2fdorjxlv33sUCx8ffaiTa7YTLDq6jaQwdAUo65pIQBE3LwyjVtycS1Szz2WA&_rdr).

11. Attached hereto as **Exhibit 10** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

12. Attached hereto as **Exhibit 11** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/st-lukes-is-harming-baby-cyrus>.

13. Attached hereto as **Exhibit 12** is a true and correct copy of screen shots I received depicting Telegram application messages. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 10 (Answer to ROG No. 26 admits use of Telegram site regarding Infant).

14. Attached hereto as **Exhibit 13** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/@RealAmmonBundy>.

15. Attached hereto as **Exhibit 14** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/archive/baby-cyrus-before-and-after-he-was-kidnapped>.

16. Attached hereto as **Exhibit 15** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

17. Attached hereto as **Exhibit 16** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

18. Attached hereto as **Exhibit 17** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

19. Attached hereto as **Exhibit 18** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

20. Attached hereto as **Exhibit 19** is a true and correct copy of a webpage download at my direction from <https://www.freedomman.org/cyrus/archive/live-updates>.

21. Attached hereto as **Exhibit 20** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/@RealAmmonBundy>.

22. Attached hereto as **Exhibit 21** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation. *See* Defendant's Responses to Plaintiffs' Second

Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 15 (limited email production).

23. Attached hereto as **Exhibit 22** is a true and correct copy of an audio file I received, called SpeakLine\_share

24. Attached hereto as **Exhibit 23** is a true and correct copy of a webpage downloaded at my direction from <https://www.boisestatepublicradio.org/politics-government/2022-03-25/ammon-bundy-pays-himself-thousands-in-campaign-cash>.

25. Attached hereto as **Exhibit 24** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation.

26. Attached hereto as **Exhibit 25** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/archive/zero-evidence-for-imminent-danger>.

27. Attached hereto as **Exhibit 26** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation.

28. Attached hereto as **Exhibit 27** is a true and correct copy of screen shots I received depicting Telegram application messages. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 10 (Answer to ROG No. 26 admits use of Telegram site regarding Infant).

29. Attached hereto as **Exhibit 28** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/2022/st-lukes-suing-us-for-exposing-them>.

30. Attached hereto as **Exhibit 29** is a true and correct copy of a webpage downloaded at my direction from <https://freedomman.org/cyrus/story>.

31. Attached hereto as **Exhibit 30** is a true and correct copy of screen shots I received depicting Telegram application messages. *See* Defendant's Responses to Plaintiffs' Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022 at 10 (Answer to ROG No. 26 admits use of Telegram site regarding Infant).

32. Attached hereto as **Exhibit 31** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation.

33. Attached hereto as **Exhibit 32** are true and correct copies of excerpted pages from the October 5, 2022 deposition of Diego Rodriguez.

34. Attached hereto as **Exhibit 33** is a true and correct copy of an email produced by Diego Rodriguez in discovery in this litigation.

35. Attached hereto as **Exhibit 34** is a true and correct copy of a webpage downloaded at my direction from <https://freedomman.org/cyrus/archive>.

36. Attached hereto as **Exhibit 35** is true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/people-responsible>.

37. Attached hereto as **Exhibit 36** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/kidnappers>.

38. Attached hereto as **Exhibit 37** is a true and correct copy of a video downloaded at my direction from <https://www.facebook.com/realammonbundy/videos/423278493120502>.

39. Attached hereto as **Exhibit 38** is a true and correct copy of a screen shot that I received depicting the People's Rights donation page for Dono Custos. *See also* <https://www.boisestatepublicradio.org/politics-government/2022-03-25/ammon-bundy-pays-himself-thousands-in-campaign-cash> (last accessed 12/5/2022).

40. Attached hereto as **Exhibit 39** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/how-you-can-help>.

41. Attached hereto as **Exhibit 40** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=keeBZxAemyI>.

42. Attached hereto as **Exhibit 41** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=GiySjoRBiFk>.

43. Attached hereto as **Exhibit 42** is a true and correct copy of a webpage downloaded at my direction from <https://abcnews.go.com/US/standoff-nevada-years-ago-set-militia-movement-crash/story?id=82051940>.

44. Attached hereto as **Exhibit 43** is a true and correct copy of a webpage downloaded at my direction from <https://www.irehr.org/reports/peoples-rights-report>.

45. Attached hereto as **Exhibit 44** is a true and correct copy of a webpage downloaded at my direction from <https://www.peoplesrights.org/contact>.

46. Attached hereto as **Exhibit 45** is a true and correct copy of a webpage downloaded at my direction from [https://www.irehr.org/reports/peoples-rights-report/middle-american-neighborhood-nationalism/#\\_ftnref66](https://www.irehr.org/reports/peoples-rights-report/middle-american-neighborhood-nationalism/#_ftnref66).

47. Attached hereto as **Exhibit 46** is a true and correct copy of a webpage downloaded at my direction from [https://www.peoplesrights.org/news\\_view?id=6a224e28-d2db-4e0c-aab7-79b7435bd66f](https://www.peoplesrights.org/news_view?id=6a224e28-d2db-4e0c-aab7-79b7435bd66f).

48. Attached hereto as **Exhibit 47** is a true and correct copy of a webpage downloaded at my direction from <https://www.peoplesrights.org/>.

49. Attached hereto as **Exhibit 48** is a true and correct copy of a webpage downloaded at my direction from <https://www.irehr.org/reports/peoples-rights-report/profile-diego-rodriguez>.

50. Attached hereto as **Exhibit 49** is a true and correct copy of a webpage downloaded at my direction from <https://www.oregonlive.com/pacific-northwest-news/2021/10/ammon-bundy-claims-new-report-undercounted-his-groups-supporters-by-half.html>.

51. Attached hereto as **Exhibit 50** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/cyrus/kidnappers/natasha-erickson/>.

52. Attached hereto as **Exhibit 51** is a true and correct copy of a webpage downloaded at my direction from <https://freedomman.org/cyrus/kidnappers/tracy-jungman>.

53. Attached hereto as **Exhibit 52** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/articles/covid-treatment-protocol>.

54. Attached hereto as **Exhibit 53** are true and correct copies of phone calls from protestors who called St. Luke's phone lines during the March 2022 protests related to the infant.

55. Attached hereto as **Exhibit 54** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/2022/why-do-they-hate-ammon-bundy-so-much/>.

56. Attached hereto as **Exhibit 55** is a true and correct copy of a webpage downloaded at my direction from <https://www.idahostatejournal.com/news/local/republican->



[senator-files-cess-and-desist-letter-against-conservative-group-responsible-for-mailer/article\\_7a5f06e4-163f-557f-ae81-4f9d25c85930.html](mailto:senator-files-cess-and-desist-letter-against-conservative-group-responsible-for-mailer/article_7a5f06e4-163f-557f-ae81-4f9d25c85930.html).

57. Attached hereto as **Exhibit 56** is a true and correct copy of a video downloaded at my direction from <https://www.freedomman.org/cyrus/archive/upcoming-pact-rally-info/?r=6173>.

58. Attached hereto as **Exhibit 57** is a true and correct copy of a video downloaded at my direction from <https://criticaldisclosure.com/category/interviews/>.

59. Attached hereto as **Exhibit 58** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=wS2b9UR8DOM>.

60. Attached hereto as **Exhibit 59** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=1FN9NBYrijY>.

61. Attached hereto as **Exhibit 60** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=QmV6R2Du5t8>.

62. Attached hereto as **Exhibit 61** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/@RealAmmonBundy>.

63. Attached hereto as **Exhibit 62** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=gfMbo9BR2CE>.

64. Attached hereto as **Exhibit 63** is a true and correct copy of a video downloaded at my direction from [https://www.youtube.com/watch?v=q\\_xwlay4mbU](https://www.youtube.com/watch?v=q_xwlay4mbU).

65. Attached hereto as **Exhibit 64** is a true and correct copy of a video downloaded at my direction from <https://freedomman.org/cyrus/press-conferences/>

66. Attached hereto as **Exhibit 65** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=OT8ZsLgwlok>.

67. Attached hereto as **Exhibit 66** is a true and correct copy of a video downloaded at my direction from <https://freedomman.org/cyrus/press-conferences/>.

68. Attached hereto as **Exhibit 67** is a true and correct copy of a video downloaded at my direction from <https://freedomman.org/cyrus/pact-rally/>.

69. Attached hereto as **Exhibit 68** is a true and correct copy of a Give Send Go screen shot compilation from the “Baby Cyrus” campaign downloaded from Web Archive on November 30, 2022.

70. Attached hereto as **Exhibit 69** is a true and correct copy of a webpage downloaded at my direction from <https://freedomman.org/cyrus/interviews-and-media/>.

71. Attached hereto as **Exhibit 70** are true and correct copies of a compilation of emails produced by Diego Rodriguez in discovery in this litigation.

72. Attached hereto as **Exhibit 71** is a true and correct copy of a Powerpoint presentation titled “People Against Child Trafficking,” produced by Diego Rodriguez in discovery in this litigation. *See* Defendant’s Responses to Plaintiffs’ Second Set of Interrogatories to Defendant Diego Rodriguez dated November 7, 2022.

73. Attached hereto as **Exhibit 72** is a true and correct copy of a webpage downloaded at my direction from <https://www.boisestatepublicradio.org/podcast/extremely-american/2022-01-19/peoples-fights>.

74. Attached hereto as **Exhibit 73** is a true and correct copy of a webpage downloaded at my direction from <https://www.theguardian.com/us-news/2022/apr/05/ammon-bundy-far-right-idaho>.

75. Attached hereto as **Exhibit 74** is a true and correct copy of a document downloaded at my direction from [https://sunshine.sos.idaho.gov/?campaigns\[0\]\[value\]=1635](https://sunshine.sos.idaho.gov/?campaigns[0][value]=1635), the

Idaho Secretary of State Campaign Finance page for Ammon Bundy Candidate for Governor - District SW.

76. Attached hereto as **Exhibit 75** is a true and correct copy of a document downloaded at my direction from [https://sunshine.sos.idaho.gov/?campaigns\[0\]\[value\]=1357](https://sunshine.sos.idaho.gov/?campaigns[0][value]=1357), the Idaho Secretary of State Campaign Finance page for Freedom Man Pac.

77. Attached hereto as **Exhibit 76** is a true and correct copy of a webpage downloaded at my direction from <https://diegorodriguez.org/>.

78. Attached hereto as **Exhibit 77** is a true and correct copy of an email I received, dated November 16, 2022.

79. Attached hereto as **Exhibit 78** is a true and correct copy of a webpage downloaded at my direction from <https://www.freedomman.org/>.

80. Attached hereto as **Exhibit 79** is a true and correct copy of a video downloaded at my direction from <https://www.youtube.com/watch?v=MaRScsCK2l0>.”

81. Attached hereto as **Exhibit 80** is a true and correct copy of a video downloaded at my direction from [https://www.youtube.com/watch?v=\\_tJo7j9CW7M](https://www.youtube.com/watch?v=_tJo7j9CW7M).”

82. Attached hereto as **Exhibit 81** is a true and correct copy of a webpage downloaded at my direction from <https://thewashingtonstandard.com/american-militia-freedom-forces-issue-call-to-action-regarding-kidnapped-idaho-baby-cyrus-video/>.

83. Attached hereto as **Exhibit 82** is a true and correct copy of a demonstrative graphic prepared at my direction.

84. Attached hereto as **Exhibit 83** is a true and correct copy of a demonstrative graphic prepared at my direction.

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

DATED this 5th day of December, 2022.

/s/ Erik F. Stidham

Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 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

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

People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

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

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

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

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

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

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

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

Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☒ Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

/s/ Erik F. Stidham

Erik F. Stidham  
OF HOLLAND & HART LLP

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