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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 NATASHA D.
ERICKSON, M.D. IN SUPPORT OF
MOTIONS FOR LEAVE TO AMEND
COMPLAINT TO ALLEGE PUNITIVE
DAMAGES**

FILED UNDER SEAL

I, Natasha D. Erickson, M.D., declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am a pediatric physician at the St. Luke’s Regional Medical Center in Boise (“St. Luke’s Boise”). My job is to diagnose and treat sick children. I am an employee of St.

Luke's Health System, Ltd. ("St. Luke's") and am not an agent or employee of the Idaho Department of Health and Welfare ("DHW") or any other government entity.

3. On March 1, 2022, the parents of a ten-month-old infant (the "Infant") brought the Infant to St. Luke's Boise because the Infant had been vomiting and losing weight.

4. I, along with other St. Luke's providers, diagnosed the Infant with severe malnutrition and began treatment that included feeding the Infant via a nasal tube. This treatment succeeded and the Infant gained weight. By March 4, 2022, the Infant had begun to bottle feed. During this period, I and other St. Luke's providers informed the Infant's parents about the Infant's treatment. The Infant's parents consented to the Infant's treatment at St. Luke's Boise.

5. On March 4, 2022, the Infant's parents insisted that they take the Infant home. I agreed to discharge the Infant but told the Infant's parents that follow-up evaluations of the Infant would be medically necessary. Upon discharge, I and other St. Luke's providers decided to leave the Infant's nasal feeding tube in place so that the Infant could be fed if his breast or bottle feeding decreased.

6. I did not inform DHW or any other government entity about the Infant at any time.

7. I understand that on March 11, 2022, the Meridian police declared the Infant at risk of imminent harm, found the Infant, and transported the Infant to a St. Luke's hospital in Meridian ("St. Luke's Meridian"). I played no role in any of those events. I did not refer the Infant to CPS. I had no contact with the police or DHW about the Infant on March 11, 2022 or at any other time.

8. I happened to be on shift at St. Luke's Boise in the early morning of March 12, 2022. That morning, the Infant was transferred from St. Luke's Meridian to the pediatric floor of

St. Luke's Boise. I admitted the Infant and, along with other St. Luke's providers, diagnosed the Infant with severe malnutrition and dehydration. The Infant had lost significant weight since the Infant's March 4th discharge and, among other symptoms, had kidney and liver problems consistent with dehydration. The Infant's nasal feeding tube was no longer in place.

9. I was not in the hospital for the lockdown, but I received notification of the event via text. I immediately feared for the safety of my patients and my colleagues in the hospital. When I went to work that night for another night shift, I was anxious about approaching the hospital, uncertain if my personal safety was compromised. I notified my husband with excessive frequency of when I had departed or arrived at work, even in the middle of the night or early hours in the morning. I also requested security escorts to my vehicle when leaving the hospital which I have never done while working at St. Luke's or at any other hospital in my career.

10. I understand that the website www.freedomman.org accused me of kidnapping the Infant. I also understand that the website www.peoplesrights.org calls me a "criminal[] with a license to kidnap babies from their nursing mothers," posting my full name and photo with this statement. These accusations are false. Between March 1, 2022 and March 4, 2022, the Infant's parents admitted the Infant to St. Luke's Boise. On March 12, 2022, the Meridian police department brought the Infant to St. Luke's. At the time I assumed, and now actually know, that the police had lawful authority to bring the Infant to St. Luke's.

11. I understand that the website www.freedomman.org posts my photo with the title, "CPS Referrer and Destroyer of Families: Dr. Natasha Erickson," then goes on to imply I abused the Infant's family and other families, stating, "imagine how many other families she has abused in her years of work at St. Luke's?" This is false. I always provide medical care in the best interest of the child. I did not refer the Infant or the Infant's parents to CPS.

12. I understand that Diego Rodriguez doxed me via his website www.freedomman.org, which posts my name, contact information, biography, and photo on the same page that he calls me abusive and a “Destroyer of Families.” St. Luke’s took this information off its website to protect my safety, but Rodriguez offered it to his followers to invite them to harass and threaten me.

13. The false accusations and doxing caused and continue to cause me mental distress and reputational harm. These public accusations of kidnapping and harming children have adversely affected my sleep patterns and created anxiety and stress. These defamatory actions, coupled with the incitements to harass me and my family and implied threats of violence from Defendants’ followers, have had a traumatic effect.

14. Owing to the false statements and harassment caused by Defendants, I have experienced the symptoms indicative of post-traumatic stress syndrome, including (1) at least one re-experiencing symptom, (2) at least one avoidance symptom, (3) at least two arousal and reactivity symptoms, and (4) at least two cognition and mood symptoms.

15. As for re-experiencing symptoms, I have experienced flashbacks accompanied by physical symptoms, reoccurring memories of the threats, distressing thoughts, and physical signs of distress such as racing heart and perspiration.

16. I have experienced avoidance symptoms such as staying away from places and activities owing to concern for my safety, the safety of my family and friends, those in my care, and those who attend my place of worship. These symptoms have caused me to make changes in my routines and activities.

17. I have experienced arousal and reactivity symptoms, including being more easily startled, feeling tense, and difficulty sleeping. These symptoms have occurred in common place

occurrences such as when I am asked for personal information when making a transaction or such as when a stranger makes small talk inquiring about my children.

18. I have experienced cognition and mood symptoms owing to the trauma such as negative thoughts about my circumstances and ongoing negative emotions.

19. This mental distress has disrupted my daily life and made it more difficult for me to do my job as a pediatric physician.

20. This distress due to the doxing, intimidation, and false statements by Defendants about me, has caused me to seek counseling. I have incurred medical bills as a result. I intend to continue to see my counselor until the mental distress I am experiencing lessens.

21. I am concerned for the safety of my family and for my own personal safety. Defendants' lies have falsely portrayed me as a criminal and a despicable person engaged in child trafficking. I worry that these lies will cause one or some of Bundy's or Rodriguez's followers to act violently toward my family or me. Because of this, I purchased a security system and security cameras for around my home, which cost approximately \$610.00.

22. I have also suffered harm to my reputation. I became a pediatrician because I care about children and want to help them and their families. Being accused of crimes against children obviously harms my reputation. It also casts a shadow over my career.

23. Moreover, the impact is repeated each time Defendants make another defamatory statement about me and grows each day that Defendants persist in keeping the defamatory postings up on the websites they control.

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

Executed this 8th day of November, 2022.

/s/ Natasha D. Erickson, M.D.
Natasha D. Erickson, M.D.

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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