

January 27, 2023

VIA EMAIL

Diego Rodriguez
Freedom Man PAC
Freedom Man Press LLC
freedommanpress@protonmail.com

Re: *St. Luke's et al. v. Ammon Bundy et al.* – Protective Order – Cease and Desist

Mr. Rodriguez:

As you know, the court entered the enclosed protective order and served copies by mail. In addition, this was provided to you through iCourt. You personally are on notice of the Court's order. Freedom Man PAC and Freedom Man Press LLC are on notice because you, their representative, have been served the protective order.

You and any officer, agent, employee of Freedom Man PAC and Freedom Man Press LLC are prohibited from threatening or harassing any witness, potential witness, or attorneys involved in the case. This includes every individual named in the protective order and others, including, but not limited to, Nadia Kravchuk, Erik Stidham, Laura Thompson, Chris McCurdy, Dr. Rachel Thomas, Blake Higley, Judge Annie McDevitt, and Judge Laurie Fortier, Kelly Shoplock, Police Officer Sean King, Police Sergeant Christopher McGilvery, Police Detective Jeff Fuller, Nice Loufoua, Kyle Bringhurst, Aaron Dykstra, .

Read the order carefully. Anyone who violates it may be held in contempt of court.

This cease and desist letter is sent without waiver of any right or remedy available at law or equity.

You, Freedom Man PAC, and Freedom Man Press LLC must cease and desist the harassment, intimidation, and threats. A non-exhaustive list of examples of such harassment, intimidation, and threats includes:

(1) Calls to action and harassment against Holland & Hart LLP, for example:

<https://stlukesexposed.com/lawsuit/wicked-people/>

<https://www.freedomman.org/2022/my-response-to-the-idaho-statesman-st-lukes-lawsuit/>

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

(2) Calls to action and harassment against Meridian Police Department, for example:

<https://www.freedomman.org/2022/open-letter-meridian-police-ada-county-sheriff/>

<https://www.freedomman.org/cyrus/archive/press-conference-tomorrow/>

<https://www.freedomman.org/cyrus/archive/police-chief-and-sheriff-challenged/>

<https://www.freedomman.org/cyrus/archive/they-tried-to-take-baby-cyrus-again/>

<https://www.freedomman.org/cyrus/archive/sean-king-meridians-finest-groper/>

<https://www.freedomman.org/cyrus/archive/baby-cyrus-has-genuine-ptsd/>

<https://www.freedomman.org/cyrus/archive/medical-proof-baby-cyrus-kidnapping-was-a-fraud/>

<https://www.freedomman.org/cyrus/archive/constitutional-rights-violated-by-meridian-police-and-judge-laurie-fortier/>

<https://www.freedomman.org/cyrus/archive/they-lied-to-you-baby-cyrus-was-healthy-baby-when-kidnapped/>

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

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

(3) Calls to action and harassment against witness and potential witnesses in this case, for example,

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

<https://www.freedomman.org/cyrus/kidnappers/aaron-dykstra/>

<https://www.freedomman.org/cyrus/archive/is-baby-cyrus-okay/>

<https://www.freedomman.org/cyrus/kidnappers/tracy-jungman/>

<https://www.freedomman.org/cyrus/kidnappers/natasha-erickson/>

<https://www.freedomman.org/cyrus/archive/zero-evidence-for-imminent-danger/>

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

<https://www.freedomman.org/cyrus/archive/shelter-care-hearing-end-of-day-update/>

<https://www.freedomman.org/cyrus/archive/adjudicatory-hearing-postponed/>

<https://www.freedomman.org/cyrus/archive/show-of-solidarity-for-baby-cyrus/>

<https://www.freedomman.org/cyrus/archive/insider-information-from-a-whistleblower/>

<https://www.freedomman.org/cyrus/kidnappers/laurie-fortier-laura-thompson/>

<https://www.freedomman.org/cyrus/archive/impossibility-of-cps-social-workers-objectivity/>

<https://www.freedomman.org/cyrus/archive/meet-kelly-shoplock-an-evil-cog-in-idahos-child-trafficking-machine/>

(4) Calls to action and harassment against St. Luke's Health System, for example:

<https://www.facebook.com/SaveBabyCyrus/>

<https://stlukesexposed.com/>

<https://stlukesexposed.com/truth-about-st-lukes/>

<https://stlukesexposed.com/truth-about-st-lukes/page/>

<https://stlukesexposed.com/truth-about-st-lukes/how-st-lukes-killed-a-10-month-old-baby/>

<https://stlukesexposed.com/share-your-story/>

<https://stlukesexposed.com/articles/>

<https://www.freedomman.org/cyrus/archive/original-story/>

<https://www.freedomman.org/cyrus/archive/st-lukes-is-harming-baby-cyrus/>

<https://www.freedomman.org/cyrus/archive/positive-development-in-baby-cyrus-case/>

<https://www.freedomman.org/cyrus/archive/baby-cyrus-before-and-after-he-was-kidnapped/>

<https://www.freedomman.org/cyrus/archive/your-prayers-are-working/>

<https://www.freedomman.org/cyrus/archive/emergency-update-prayer-and-protest-tomorrow-at-courthouse/>

<https://www.freedomman.org/cyrus/archive/prayer-and-protesting-continues/>

<https://www.freedomman.org/cyrus/archive/baby-cyrus-is-home/>

<https://www.freedomman.org/cyrus/archive/upcoming-pact-rally-info/>

<https://www.freedomman.org/cyrus/archive/cps-is-genuinely-state-subsidized-child-trafficking/>

<https://www.freedomman.org/cyrus/archive/be-a-whistleblower-be-a-hero/>

<https://www.freedomman.org/cyrus/press-conferences/>

Take down the webpages linked above by 2 p.m. Monday, January 30, 2023.

You are not above the law. Stop the harassment, intimidation, and threats. Submit to the legal process. Your wrongful actions and lies caused great damage and continue to harm to my clients and countless people at St. Luke's and in the community. The mob you summoned in March 2022 threatened the lives of everyone at St. Luke's hospital—employees, public servants, and patients and their loved ones there to visit them. And you persist in posting lies and misleadingly edited videos on the internet while you hide from the lawsuit and try to avoid any accountability. These are the actions of a coward.

Sincerely,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:njh

Enclosure

20780060_v2

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

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.

Case No. CV01-22-06789

Protective Order

THIS MATTER, having come before the Court on December 20, 2022 for hearing on Plaintiffs' Motion for Protective Order filed May 11, 2022, the Court finds good cause to grant such motion.¹

IT IS HEREBY ORDERED that any person, including all Defendants and any agent of any Defendant served with this Order, are prohibited from engaging in the following actions related to this case:

(1) Any person who, by direct or indirect force, or by any threats to a person or property, or by any manner willfully² intimidates, threatens or harasses any person because such person has testified or because he³ believes that such person has testified in this lawsuit may be held in contempt of court.

¹ For reasons stated at the hearing, the Court determined it would prepare its own Protection Order rather than signing the proposed order lodged by the Plaintiffs on May 11, 2022.

² For purposes of this Order, this Court will apply the definition of "willfully" in Idaho Criminal Jury Instruction 340. An act is done "willfully" when done on purpose. One can act willfully without intending to violate the law or this order, to injure another, or to acquire any advantage.

³ The Court uses the term "he" in this Order, as the Legislature does in statutes. But the entirety of this Order applies to any person, regardless of gender.




(2) Any person who, by direct or indirect force, or by any threats to a person or property, or by any manner wilfully⁴ intimidates, influences, impedes, deters, threatens, harasses, obstructs or prevents a witness, or any person who may be called as a witness, or any person he believes may be called as a witness in this lawsuit from testifying freely, fully and truthfully in this civil proceeding may be held in contempt of court.

The fact that a person was not actually prevented from testifying shall not be a defense to a charge of contempt for the actions in subsections (1) and/or (2) of this Order.

Those that have filed testimony in this matter to date include Chris Roth, Dr. Natasha Erickson, Tracy Jungman, Dr. Jeffrey Erickson, Dr. Jamie Price, Dr. Camille LaCroix, David Barton, William T. Teninty, Jenna Balvin, Sara Berry, Jessica Flynn, John Coggins, Dennis Mesaros, Donna English, William Woods, Abby Abbondandolo, Katy Alexander, Marle Hoff, and Erik Stidham or any associated attorney at HOLLAND & HART LLP. Those who have been identified as a person who may be called as a witness to date include those listed above and also includes Eron Sanchez, Aaron Dykstra, Nice Loufoua, Meridian Police Detective Steve Hanson, Meridian Police Detective Jeff Fuller, Meridian Police Sergeant Christopher McGilver, Meridian Police Officer Sean King, Judge Laurie Fortier, Kelly Shoplock, Joseph Robert Shoplock, Kristen Nate, Roaxanne, Printz, and Kyle Bringhurst. This protection order also applies to any subsequently-disclosed witness(es) as part of the formal discovery process in this case.

This Order is binding upon Diego Rodriguez and Ammon Bundy, and also any officers, agents, and/or employees of Ammon Bundy for Governor, Freedom Man PAC, Peoples Rights Network, and/or Freedom Man Press LLC, and any other person who receives actual notice of this order by personal service or in any manner allowed for service of a complaint or summons in the Idaho Rules of Civil Procedure.

IT IS ORDERED: 1/18/2023 5:55:18 PM



Lynn Norton
District Judge

⁴ *Id.*



CERTIFICATE OF SERVICE

I certify that on this day I served a copy of the attached to:

Erik F. Stidham efstidham@hollandhart.com E-mail
Diego Rodriguez freedommanpress@protonmail.com E-mail

St Lukes Health System LTD Through counsel Erik Stidham

St Lukes Regional Medical Center LTD Through counsel Erik Stidham

Chris Roth Through counsel Erik Stidham

Natasha D Erickson MD Through counsel Erik Stidham

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C/O Diego Rodriguez
1317 Edgewater Dr. #507
Orlando, FL 32804

Trent Tripple
Clerk of the Court

Dated: 01/19/2023

By: Janine Korsen
Deputy Clerk

