

Erik F. Stidham (ISB #5483)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714  
Telephone: 208.342.5000  
Facsimile: 208.343.8869  
E-mail: [efstidham@hollandhart.com](mailto: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

**SUPPLEMENTAL DECLARATION OF  
ERIK F. STIDHAM IN SUPPORT OF  
MOTIONS FOR LEAVE TO AMEND  
COMPLAINT TO ALLEGE PUNITIVE  
DAMAGES**

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 video downloaded at my direction from [https://www.youtube.com/watch?v=GgIEip6jw\\_g](https://www.youtube.com/watch?v=GgIEip6jw_g). In Exhibit 1, Ammon Bundy states that “the way I respond to it [court filings in this case] is I take it to my filing cabinet over here [trash] and it works out really good.” (2:51-3:00). “This is the wickedness of St. Luke’s, Chris Roth, and the courts.” (3:36-3:42).

3. Attached hereto as **Exhibit 2** is a true and correct copy of a video downloaded at my direction from <https://rumble.com/v237vju-how-ammon-bundy-says-he-responds-to-lawsuit.html>. In Exhibit 2, Ammon Bundy states, “Holland & Hart filing department, I have a certain filing cabinet that I put it in. I don’t even have to open it. It’s amazing. I don’t have to do nothing. I just process it this way. I really don’t even look at it because [indistinct]. It’s going from the federal government, to the office of the governor, to St. Luke’s to Holland and Hart. And you know they have a whole team of \$600 lawyers. And they send that to me every week, and I throw it in the garbage.” (0:01-0:34).

4. Attached hereto as **Exhibit 3** is a true and correct copy of a video downloaded at my direction from <https://rumble.com/v22v9ik-interview-with-ammon-bundy-12282022.html>. In Exhibit 3, Ammon Bundy states, among other things:

- “I brought international attention to the event. Immediately, the next morning I was arrested, now all of a sudden [Infant’s] case became a national case. (26:58-27:07).
- “The courts are run, not just in Ada County, are a complete abomination to what they were designed to be. . . . The corruption in the courts are so deep and so real that it’s not a method to find justice anymore. And so we’re seeking around how,

how are we going to get justice, and what power is going to bring this justice, to stop the state, you know, how we going to get justice?” (29:58-32:16).

- “[Holding court filings] I just throw it all away. I literally take it from the mail and throw it in the garbage. And I haven’t responded one bit to them.” (41:17-41:30).
- “They’re suing me for defamation, and they’re probably going to try to get judgments against me of over a million dollars and take everything they [sic] have from me. And you know I’m not going to let that happen. And I’m making moves you know to stop that from happening. If I have to, you know, meet them at the door with my friends and shotgun, I’ll do that. You know, they’re not going to take my property.” (45:38-45:59).

5. Attached hereto as **Exhibit 4** is a true and correct copy of a video downloaded at my direction from [https://rumble.com/v22vpuc-idaho-dispatch-interviews-ammon-bundy-part-2.html?fbclid=IwAR0fNucyc2WO2KdNon\\_IQgibW5U2HopakVEw-V9\\_KH2I3-zL6A\\_6IWeq9nk](https://rumble.com/v22vpuc-idaho-dispatch-interviews-ammon-bundy-part-2.html?fbclid=IwAR0fNucyc2WO2KdNon_IQgibW5U2HopakVEw-V9_KH2I3-zL6A_6IWeq9nk). In Exhibit 4, Ammon Bundy states, among other things, “I believe that the best thing to do is completely ignore them. Let them get their judgment and protect my assets in other ways. And that’s what I’m going to do. And if I have to again stand on the front porch and defend it that way with my friends and family and whoever else will come I’ll do that. But I don’t think I have to get to that because—everything I’m doing is legal—I’m going to protect my assets the way I need to. Going to get rid of the ones that I can’t seem to hold onto because of it, and I’ll deal with it that way. but what I’m not going to do is yield to these people or be afraid of them because they will completely destroy our liberties if we allow them to. Completely.” (6:00-6:38).

6. Attached hereto as **Exhibit 5** is a true and correct copy of a screenshot taken at my direction from the video attached as Exhibit 2.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a screenshot I received.

8. Attached hereto as **Exhibit 7** is a true and correct copy of a screenshot taken at my direction from [https://www.peoplesrights.org/news\\_view/?ammon-bundy-under-extreme-attack-by-st-luke-hospital-seeking-to-destroy-him&id=34795d55-7c64-46bd-a8ef-836b54c4b3d2](https://www.peoplesrights.org/news_view/?ammon-bundy-under-extreme-attack-by-st-luke-hospital-seeking-to-destroy-him&id=34795d55-7c64-46bd-a8ef-836b54c4b3d2), stating, among other things, “CALL TO ACTION, PART 1 and 2. In the coming days, we will seek a response to evil plan of action by St Luke Hospital that has no limit on how much they will spend. We will seek ways to counter St Luke. People like Ammon and Diego are rare, and if they go down, we all go down.” “Among various actions to be taken, is attendance at the court hearing scheduled for Ada County, Boise, Idaho on January 23 . . . We need all hands on deck to come up with a counter offensive to this horrific display of weaponization of the judicial system against innocent people.”

9. Attached hereto as **Exhibit 8** is a true and correct copy of a video downloaded at my direction from <https://rumble.com/v23xsvk-idaho-dispatch-interviews-diego-rodriguez-january-3-2023.html>. In Exhibit 8, Diego Rodriguez states, among other things:

- “One of the police officers, by the way, told me himself, he said, ‘Do you want to know why we are here?’ I said, ‘Why are you here?’ He said, ‘We’re here cause you’re here.’ With his hand on his gun. Because if you make a move we’re going to kill you—that is what was inferred. And when he said, ‘We’re here cause you’re here,’ he was letting me know he knows who I am, he knows who our family is, he knows what we’ve been involved in, in terms of, you know, political rebellion, civil uh civil discourse, but also civil disobedience etc. etc. etc. He

knows who our associates are. He knows about the People's Rights Network.”  
(9:17-9:51).

- “At the end of the entire trial—which, let’s just say we lose—because it’s Ada County, and everyone knows that Ada County is totally corrupt. The justice system there is unjust—there’s no justice. The judges are corrupt. They intimidate jury members. And they—they can pick all the jury members they want. They get thirty jury members and they can be all Brad Little’s best friends and the people that are in his brothel with him, his male brothel, and he could have his cousin and his uncle and his friends and all of—all of, you know, Holland and Hart’s employees and friends and family members—and that’s all the jury. And they can tell me that I get to eliminate three of them. That’s how it works. That’s how the system works. So they stack the system against you, and the three that I eliminate, they just replace with three more people who are more insane. So it’s a total fake system and bogus. So they’re going to get whatever outcome they want. And for those—I’ve talked to other people who have been tried in Ada County—they intimidate the jurors who don’t go the way that they want. They intimidate them and force them into voting a certain way—the way that they want. (39:00-40:06).
- “Nobody cares about justice. These people don’t care about justice. They just care about keeping the cash machine going—that they have, that they’re getting from kidnapping your innocent babies.” (40:50-40:59).

10. Attached hereto as **Exhibit 9** is a true and correct copy of a video downloaded at my direction from <https://rumble.com/v23uyri-front-porch-live-jan-3-2023.html>. In Exhibit 9,

Diego Rodriguez appears with a title through the whole video “Power Marketing” in the lower  
SUPPLEMENTAL DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF  
MOTIONS FOR LEAVE TO AMEND COMPLAINT TO ALLEGE PUNITIVE  
DAMAGES - 5

left corner. After discussing the events surrounding the Infant, Mr. Rodriguez states, among other things:

- “All states, all fifty states—Texas is not clean, Florida where I now live is not clean—Idaho is not clean—there’s no place clean when it comes to this process of the states receiving compensation from the federal government for every child they kidnap without cause. It’s without cause whatsoever. Your child, you know, there’s—you don’t have to abuse your kid. In fact, if you abuse your kid, don’t worry, nothing’s going to happen to you. It’s people who are Christian people, homeschooling parents, people who support Donald Trump, people who are Republicans, people who don’t take the vaccine, people who are noncompliant with, you know, the system as it is, they’re the people that are being targeted.” (8:18-8:55).
- “To limit tyranny. This one is so important particularly because we are living in a time—could you ever imagine that we’d be living in a time, living in America, with the amount of tyranny that we’re dealing with, where churches are being shut down, pastors are being arrested, people’s kids are being kidnapped and taken away from them, people are being forced to take medical injections that they don’t want, I mean—every single area of our life is, is—there’s tyranny in America. But entrepreneurship helps limit tyranny. And one of the things we know is that a huge amount of tyranny we see today are partnerships between big corporations and government. . . . evil corporations . . . we need these corporations to be replaced by Bible-based entrepreneurs.” (39:25-40:27).
- “Hopefully the paradigm here has shifted a little for some people here, and they’re thinking, okay cool, I want to do this, I’m inspired, I want to become an entrepreneur as well. How do I become an entrepreneur? Well I mentioned before that there are seven

major skills of entrepreneurship. We teach these. For those who don't know, this is exactly what I do. I am a business development consultant. I've been doing this now for over ten years. . . Our training, if you want to come, we'll be happy to let any of you guys come to three-day training that costs \$15,000." (43:16-44:32).

11. Attached hereto as **Exhibit 10** is a true and correct copy of screenshots taken at my direction on January 5, 2023, from Telegram.

12. Attached hereto as **Exhibit 11** are excerpts of a post downloaded at my direction from <https://sonsoflibertymedia.com/idaho-american-militia-freedom-forces-seek-to-arrest-jail-hold-for-trial-all-involved-in-kidnapping-baby-cyrus-anderson/>.

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

DATED this 6th day of January, 2023.

/s/ Erik F. Stidham

Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2023, 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*

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Erik F. Stidham  
OF HOLLAND & HART LLP

20632535\_v1

# Exhibit 1

See Thumb Drive

# Exhibit 2

See Thumb Drive

# Exhibit 3

See Thumb Drive

# Exhibit 4

See Thumb Drive

# Exhibit 5

# How Ammon Bundy Says He Responds to Lawsuit.



**IdahoDispatch** · Published December 31, 2022 · 395 Views  
**\$1.03 earned**



# Exhibit 6




**All men of militia age active or not, be prepared to save baby Cyrus from the child traffickers of Ada County, Idaho!**

   16

2 Comments 2 Shares

 Like

 Share

Most relevant ▾



Jessica Liberty

Sounds like theyve given him to Foster parents. So where is he. They snuck him out when people left the hospital.....this is not OK. They are punishing the mother for missing an appointment! This isn't about his health! Also GOV Little has an axe to grind with the Grandpa! This IS political!!

Like 1d

 4



Brand Thornton

Jessica Liberty he is still in the hospital. The protestors being there changed their plans.

Like 1d

  5

Heads up: Ammon Bundy's People's Rights network (PRN) appears to potentially be gearing up for another armed conflict. This is from PRN leader, Brand Thornton.



**Devin Burghart**

twitter.com

# Exhibit 7

## Newsroom



# AMMON BUNDY UNDER EXTREME ATTACK BY ST LUKE HOSPITAL SEEKING TO DESTROY HIM CALL-TO-ACTION! 🚀

St Luke hospital has given a blank check to one of the largest law firms in Idaho, to spare no expense going after Ammon Bundy and Diego Rodriguez for defamation

📁 Case   🗓 Dec 29, 2022   🕒 Dec 29, 2022

217 9

📍 Utah 3A

🔗 Share (Alt)

**CALL TO ACTION, PART 1 and 2.** In the coming days, we will seek a response to evil plan of action by St Luke Hospital that has no limit on how much they will spend. We will seek ways to counter St Luke. People like Ammon and Diego are rare, and if they go down, we all go down. <https://rumble.com/v22v9jk-interview-with-ammon-bundy-12282022.html>

St Luke Hospital, Boise, Idaho says money is no object and has authorized their legal firm to go after Ammon Bundy in a defamation lawsuit. Ammon goes into great detail how they are doing it including harassment by burying him in 10s' of 1000's of pages of legal documents demanding his response to each individual page and failure to do so, could result in contempt of court and other penalties. What is playing out is a stark and vivid display of corruption on a scale seldom seen, through the weaponization of the Idaho judicial system against a person who has exposed that corruption including the corruption of St Luke Hospital.

In the coming days, we will be seeking your input on a plan of action against St Luke Hospital. We will be trying St Luke Hospital in the court of public opinion.

We will be holding brainstorming and planning sessions online, through Skype or similar. This not just the business or concern of Ammon and Diego, it is all of our concern, and all of our business, and all of us need to take action!




If you are interested in participating, please respond with an email.

AND ALWAYS REMEMBER, WHAT IS HAPPENING TO AMMON BUNDY AND DIEGO RODRIGUEZ, CAN HAPPEN TO YOU OR A LOVED ONE.

 [View Comments](#)

## Among various actions to be taken, is attendance at the court hearing scheduled for Ada County, Boise, Idaho on January 23

**CALL-TO-ACTION!** 

 Dec 29, 2022  Dec 29, 2022  Dec 29, 2022, 4:27 pm MST → Jan 23, 2023, 4:28 pm MST

 [Permalink \(Alt\)](#)

Put this on your calendars, more information to come.

St Luke Hospital, who receives many millions of dollars in our tax money, has unlimited funds to spend in malicious prosecution of Ammon and Diego.

We need all hands on deck to come up with a counter offensive to this horrific display of weaponization of the judicial system against innocent people.

 [View Comments](#)

 **Spread It!** 

[Copy Link](#)

[Alternate Link](#)

COPY

Click a button above to copy the address (URL) of this page to your system clipboard.



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 Back to Newsroom

# Exhibit 8

See Thumb Drive

# Exhibit 9

See Thumb Drive

# Exhibit 10



PACT Telegram

People Against Child Trafficking, P.A.C.T (Official)

131 members



Pinned message

<https://www.givesendgo.com/G6J75>

some good news. Tapas bar closed after drag show.



35.4K 5:49 PM

David Pettinger

Forwarded from ID DISPATCH

<https://idahodispatch.com/st-lukes-hospital-suing-ammon-bundy-diego-rodriguez-and-various-other-entities-regarding-protests/>

Idaho Dispatch

St. Luke's Hospital Suing Ammon Bundy, Diego Rodriguez, and Various Other Entities Regarding Protests

St. Luke's Health System is suing Ammon Bundy, Diego Rodriguez, the People's Rights Network, FreedomMan Press LLC, Freedom...



6 171 8:01 PM

CMB777 ID added M B

CMB777 ID



David Pettinger

<https://idahodispatch.com/st-lukes-hospital-suing-ammon-bundy-diego-rodriguez-and-various-other-entities-regarding-protests/>

Are they proceeding a counter civil suit against St. Luke's? I hope so.



edited 8:42 PM

Thea Harn

My son is still being held in Idaho. Keep sharing and 🙏 please. Court tomorrow



4 10:21 PM

People Against Child Trafficking, P.A.C.T (Official)

131 members



Pinned message

<https://www.givesendgo.com/G6J75>

sakaraat



David Pettinger

<https://idahodispatch.com/st-lukes-hospital-suing-ammo...>

All of them should immediately file grievances with Bar and fbi against opposing lawyers and their firms for trespass on their private matter and false trespass charges. And then watch how after second grievance lawyers run for life.

File notice of claim for over 75k against each lawyer and firm and it will ring their indemnity insurance and they will lose their licence and then they will start searching for a new carrier, lol

Then counter sue them for extortion, frivolous claims, etc

More info with free advice, free documents review, free templates, here

<https://t.me/AlphonseFaggiolo>

Telegram

Alphonse Faggiolo

Law Group Discussion, Learn How To Plead & Litigate Lawsuits, Learn To Exercise Your Rights

<http://www.HowToWinInCourt.com?refercode=...>



VIEW GROUP

10:28 PM



sakaraat

All of them should immediately fil...



Template Notice Of Claim 10.pages

711.8 KB

10:29 PM

Go to AlphonseFaggiolo group, click description, click files, and search what ever document you need

10:31 PM

Forwarded from Joseph M



Notice of Claim Template.docx

192.1 KB

10:31 PM



**DavidPettinger** @DavidPettinger · 3h



Diego unchained!

Drops fighting words for [@StLukesHealth](#) .

Gives an update on [@PoliceMeridian](#) .

Takes on [@IDHW](#) .

[rumble.com/v23xsvk-idaho-...](https://rumble.com/v23xsvk-idaho-...) ✓

[#idpol](#) [#idleg](#) [#idgop](#)



[rumble.com](https://rumble.com)

Idaho Dispatch Interviews Diego Rodriguez - January 3, 2023

Idaho Dispatch asks Diego Rodriguez to describe the "Save Baby Cyrus" experience regarding his grandson, and the lawsuit that has ...



# Exhibit 11

# Idaho: American Militia Freedom Forces Seek To “Arrest, Jail & Hold For Trial” All Involved In Kidnapping Baby Cyrus Anderson

WRITTEN BY: **TIM BROWN**

PUBLISHED ON: MARCH 18, 2022

f Facebook

Twitter

Pinterest



Here's What New Gutter Guards Should Cost In 2023  
*Here's The Average Price Of Gutter Protection*

As a judge has ruled that Ammon Bundy is somehow trespassing because he engages in a First Amendment protected right to protest against government tyranny, namely the kidnapping of a young child from his parents and then failing to care for him, the American Militia Freedom Forces have put out a statement of their agenda to “ARREST, Jail, and Hold For Trial, by a Jury of Peers, the Judge, the DA, and all their BLUEcoat henchmen of these Capital Felony crimes that led up to the Kidnapping of Baby Cyrus.”

*The AMERICAN MILITIA FREEDOM FORCES, THEREFORE AND THEREBY, ARE DIRECTED TO DEPLOY ASAP, TO REMAIN IN FULL FORCE AND READINESS, IN BOISE, UNTIL:*

*1.) BABY CYRUS IS SAVED AND RETURNED TO MARISSA THE MOTHER AND LEVI ANDERSON THE FATHER.*

*2.) ALL CHARGES MADE IN INFAMY AGAINST MARISSA, LEVI, DIEGO RODRIGUEZ (grandfather), AMMON BUNDY, AND/OR ANY OTHER PERSON ARRESTED AND CHARGED UNDER COLOR OF LAW, IN VIOLATION OF TITLE 18 U.S. CODE 241/242 (See; <https://www.justice.gov/crt/deprivation-rights-under-color-law>), ARE TOTALLY AND UTTERLY DISMISSED.*

*3.) ALL CAPITAL FELONY INSURRECTIONIST AND TREASONOUS PERPETRATORS ARE ARRESTED, JAILED AND HELD FOR TRIAL, IN PURSUANCE OF ALL CONSTITUTIONAL LAWS and TITLE 18 U.S. CODE 241/242 DEPRIVATION OF RIGHTS UNDER COLOR OF LAW. (<https://www.justice.gov/crt/deprivation-rights-under-color-law>)*

*4.) TROOPS SHALL MAINTAIN A VERY SIGNIFICANT PRESENCE UNTIL ALL CAPITAL FELONY PERPETRATORS HAVE BEEN TRIED AND PROSECUTED TO THE FULLEST EXTENT OF THE LAW.*

*5.) TROOPS SHALL, RESTORE THE COMMON LAW GRAND JURY, TO FULL FORCE AND EFFECT, TO CONDUCT ALL THEIR NORMAL CONSTITUTIONAL DUTIES IN PURSUANCE TO CONSTITUTIONAL COMMON LAW, IN THE ADA COUNTY COURTHOUSE.*

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*TROOPS MOUNT UP and DO WHAT YOU HAVE BEEN ASSIGNED TO DO UNDER THE SECOND AMENDMENT LAW and ARTICLE I SECTION 8 CLAUSE 15 of The Constitution; "EXECUTE THE (Supreme) LAWS OF THE UNION, ..." ESTABLISHED AND ORDAINED by WE THE PEOPLE UPON ALL OUR Public SERVANTS.*