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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

**AFFIDAVIT OF JENNIFER JENSEN IN
SUPPORT OF MOTION FOR
CONTEMPT AGAINST AMMON
BUNDY AND PEOPLE’S RIGHTS
NETWORK**

STATE OF IDAHO)
 :ss.
County of ADA)

I, Jennifer Jensen, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. Plaintiffs have moved for contempt against Bundy before in this lawsuit. They initially filed and served a Motion for Sanctions and Contempt against Bundy on August 12, 2022, with supporting papers and a Notice of Hearing setting the hearing for September 6, 2022. Bundy did not file any response. I attended the hearing. At the hearing, Bundy did not appear, nor did anyone appear on his behalf. This Court granted sanctions because Bundy had violated the Amended Order on the Motion to Expedite Discovery and deferred any contempt ruling.

3. After Bundy violated a second order of the Court, on September 28, 2022, Plaintiffs filed and served a Motion for Further Sanctions and Renewed Motion for Contempt against Bundy with supporting papers and a Notice of Hearing setting the hearing for October 11, 2022. Bundy did not file any response. I attended the hearing. Again, Bundy did not appear, and no one appeared on his behalf. Because Bundy had violated the Court’s order requiring him to sit for a deposition, the Court granted Plaintiffs’ motion in part by entering a preliminary injunction. A true and correct copy of the Preliminary Injunction Order is attached hereto as **Exhibit A**.

4. At my direction, on October 15, 2022, the Gem County Sheriff’s Department personally served a copy of the Preliminary Injunction Order (among other filings) on Ammon Bundy at 4615 Harvest Lane, Emmett, Idaho 83617. People’s Rights Network was served in the same manner at the same time. A true and correct copy of the Personal Returns of Service from the sheriff’s department are attached hereto as **Exhibit B**.

5. On January 19, 2023, this Court entered a Protective Order. A true and correct copy of the Protective Order is attached hereto as **Exhibit C**.

6. The Protective Order was duly served on Bundy and People's Rights Network. The Protective Order's Certificate of Service reflects that the Court served Bundy and People's Rights Network by mailing a copy to 4615 Harvest Lane, Emmett, Idaho 83617. Moreover, to ensure that Bundy and People's Rights Network received the Protective Order as soon as possible, on January 20, 2023, I personally took a copy of the Protective Order to Bundy's home (4615 Harvest Lane, Emmett, Idaho 83617), where I left it with a woman who appeared to be residing there and I believe to be Mr. Bundy's wife (based on photos from the Ammon Bundy for Governor website). Along with the Protective Order, I served a cease-and-desist letter. A true and correct copy of the cease-and-desist letter is attached hereto as **Exhibit D**.

7. Bundy even acknowledged receipt of the Protective Order by publishing a copy of it on the People's Rights Network website at <https://pplsrghs.org/f6984a7c-eafc-4082-a3b4-e99dfe129733/fe460e82-b6b9-4403-a0f8-dfeb6c7914ea>. A true and correct copy of screen shots of that web page, with a copy of the as-published Protective Order is attached hereto as **Exhibit E**.

8. As detailed in the cease-and-desist letter, Bundy was notified of specific web pages that needed to be removed pursuant to the Protective Order ("Web Pages"). A true and correct copy of screen shots of the Web Pages, taken at my direction on February 3, 2023 is attached hereto as **Exhibit F**. The Web Pages include material Bundy and PRN were required to remove pursuant to the Preliminary Injunction Order (statements on the www.peoplesrights.org website stating or alleging that Chris Roth is a criminal accessory of child abduction).

9. As of the date of this filing, the Web Pages have not been removed. To my knowledge, my office has not received any response from Bundy or PRN regarding the cease-and-desist letter, Protective Order, or Preliminary Injunction Order.

10. Maintaining the Web Pages causes ongoing harm to Plaintiffs. The false statements continue to cause reputational harm and to invite physical threat from People's Rights Network members and other followers of Bundy. The threat grows greater as time passes because Bundy has been spinning a narrative in the media about how this lawsuit evidences his suffering as the victim of supposedly corrupt organizations and individuals, including Plaintiffs. Such rhetoric encourages others to harm Plaintiffs. He has even declared that his and PRN's use of violence is justified against his enemies. A true and correct copy of screen shots of these statements from Bundy are attached hereto as **Exhibit G**. These screen shots were taken at my direction from https://www.peoplesrights.org/news_view/?there-is-no-silver-bullet-to-securing-liberty&id=2b476184-0ae7-4e47-bbeb-8174072d5e73 and https://www.peoplesrights.org/news_view/?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&id=f6984a7c-eafc-4082-a3b4-e99dfe129733.

11. Because of the violent rhetoric found in Exhibit F, Bundy's statements have received substantial media attention. A true and correct copy of a set of exemplary news articles about Bundy's statements is attached hereto as **Exhibit H**.

12. Attached hereto as **Exhibit I** 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 I, Ammon Bundy states, among other things:

- “The courts are run, not just in Ada County, are a complete abomination to what they’re designed to be The corruption in the courts are so deep and so real that it’s not a method to find justice anymore.” (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).

13. Attached hereto as **Exhibit J** is a true and correct copy of the Amended Complaint and Demand For Jury Trial (Redacted), dated June 2, 2022.

14. Attached hereto as **Exhibit K** is a true and correct copy of the Order for Entry of Default Against Ammon Bundy, Ammon Bundy for Governor, and People’s Rights Network, dated September 2, 2022.

15. Bundy did not limit himself to publishing threats on the PRN website. Bundy also published his “Come Not Upon Me” threats to Chris Roth, Erik Stidham and others on other forums, including the far-right website, Idaho Dispatch. See https://idahodispatch.com/?s=bundy&post_type=post idahodispactch.com. A true and correct copy of screen shots were taken at my direction, from <https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammon-bundy/> are attached hereto as **Exhibit L**.

16. Attached hereto as **Exhibit M** 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-husbandi Inc., Profit Corporation.

17. Attached hereto as **Exhibit N** 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.

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

19. Attached hereto as **Exhibit P** 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>.

20. Attached hereto as **Exhibit Q** 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).

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

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

23. Attached hereto as **Exhibit T** 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.

24. Attached hereto as **Exhibit U** is a true and correct copy of the Declaration of Chris Roth in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages (Redacted) filed on December 6, 2022.

25. Attached hereto as **Exhibit V** is a true and correct copy of the Declaration of Dennis Mesaros in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages (Redacted) filed on December 6, 2022.

26. Attached hereto as **Exhibit W** is a true and correct copy of the December 15, 2020 Idaho Press’s article “Bundy group, People’s Rights, training to defend from government ‘force.’” A true and correct copy of screen shots were taken at my direction, from https://www.idahopress.com/news/local/bundy-group-peoples-rights-training-to-defend-from-government-force/article_fdf76b0a-2e2a-53f0-89e9-8c877c647bab.html

27. Plaintiffs’ People’s Rights Network – Contempt of Protective Order - Summary of References to Individuals table is attached hereto as **Exhibit X**.

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

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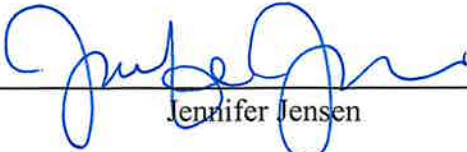
///

///

///

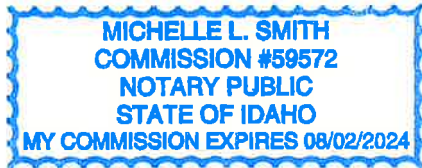
///

Executed this 3rd day of February, 2023.



Jennifer Jensen

SUBSCRIBED AND SWORN TO before me this 3rd day of February, 2023.





(Signature of notarial officer)

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 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	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered via Process Server <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered via Process Server <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered via Process Server <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered via Process Server <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	---

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered via Process Server <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
dr238412@me.com;
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20795968_v1

EXHIBIT A

EXHIBIT A

**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; and
NATASHA D. ERICKSON, MD, 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. **CV 01 22 06789**

**ORDER GRANTING MOTION FOR
PRELIMINARY INJUNCTION**

THIS MATTER having come before the Court on Plaintiffs Chris Roth and Natasha Erickson's Motion for a Preliminary Injunction, the Court finds good cause to approve said Motion as to the defaulted parties Ammon Bundy, an individual; Ammon Bundy for Governor; Freedom Man Press LLC; Freedom Man PAC; and People's Rights Network.

NOW, THEREFORE, it is hereby ordered that the Motion for a Preliminary Injunction is GRANTED and Defendants Ammon Bundy, Freedom Man Press LLC, and People's Rights Network are enjoined to remove:

- Statements on the www.peoplesrights.org website stating or alleging that Chris Roth is a criminal accessory of child abduction; and
- Statements on the www.freedomman.org website stating or alleging that Natasha Erickson is responsible for kidnapping or child trafficking.

IT IS SO ORDERED.

DATED 10/12/2022.



Lynn Norton
District Judge

CERTIFICATE OF SERVICE

I hereby certify that 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:

Erik F. Stidham
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
efstidham@hollandhart.com

Diego Rodriguez
1317 Edgewater Drive #5077
Orlando, FL 32804

- By mail
- By E-mail: freedommanpress@protonmail.com



Clerk of the Court 10/12/2022 11:09:07 AM
Deputy

18751567_v1

EXHIBIT B

DONNIE WUNDER
(208) 365-4483

GEM COUNTY SHERIFFS DEPARTMENT
410 E 1ST STREET
EMMETT, ID 83617

Paper ID: 202200554

P E R S O N A L R E T U R N O F S E R V I C E

ST LUKES HEALTH SYSTEM

-- VS --

PLAINTIFF(S)

COURT: 4TH ADA

CASE NO: CV01-22-06789

AMMON E BUNDY

DEFENDANT(S)

PAPER(S) SERVED:
ORDER

I, DONNIE WUNDER, SHERIFF OF GEM COUNTY, STATE THAT THE ABOVE DESCRIBED DOCUMENTS WERE DELIVERED TO ME FOR SERVICE ON THE 14TH DAY OF OCTOBER 2022.

I HEREBY CERTIFY THAT, ON THE 15TH DAY OF OCTOBER 2022, AT 11:30 O'CLOCK A.M., I, SHAWN DILLON, BEING DULY AUTHORIZED, SERVED THE ABOVE DESCRIBED DOCUMENTS IN THE ABOVE-ENTITLED MATTER UPON

***** AMMON E BUNDY *****

PERSONALLY AT: 4615 HARVEST LANE EMMETT ID 83617

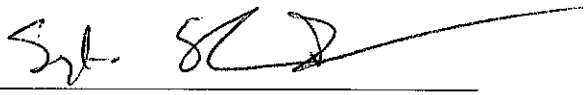
WITHIN THE COUNTY OF GEM, STATE OF IDAHO.

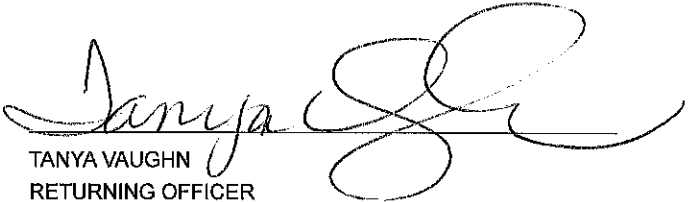
COMMENTS: RECEIVED AND PROCESSED ORDER AWARDING FEES, AND ORDER GRANTING IN PART, DENYING IN PART MOTION FOR FURTHER SANCTIONS AND RENEWED MOTION FOR CONTEMPT AGAINST AMMON BUNDY AND ORDER GRANTING MOTION FOR PRELIMINARY INJUNCTION ON 10/14/2022. ON 10/15/2022 AT 11:30A 256 SERVED AMMON BUNDY

DATED THIS 17TH DAY OF OCTOBER 2022.

DONNIE WUNDER
SHERIFF

SHERIFF'S FEES:	50.00
TOTAL COLLECTED TO DATE:	50.00
AMOUNT UNCOLLECTED:	0.00

BY 
SHAWN DILLON
SERVING OFFICER

BY 
TANYA VAUGHN
RETURNING OFFICER

GEM COUNTY SHERIFFS DEPARTMENT

DONNIE WUNDER
(208) 365-4483

410 E 1ST STREET
EMMETT, ID 83617

Paper ID: 202200556

P E R S O N A L R E T U R N O F S E R V I C E

ST LUKES HEALTH SYSTEM

-- VS --

PLAINTIFF(S)

COURT: 4TH ADA

CASE NO: CV01-22-06789

PEOPLE'S RIGHTS NETWORK

DEFENDANT(S)

PAPER(S) SERVED:
ORDER

I, DONNIE WUNDER, SHERIFF OF GEM COUNTY, STATE THAT THE ABOVE DESCRIBED DOCUMENTS WERE DELIVERED TO ME FOR SERVICE ON THE 14TH DAY OF OCTOBER 2022.

I HEREBY CERTIFY THAT, ON THE 15TH DAY OF OCTOBER 2022, AT 11:30 O'CLOCK A.M., I, SHAWN DILLON, BEING DULY AUTHORIZED, SERVED THE ABOVE DESCRIBED DOCUMENTS IN THE ABOVE-ENTITLED MATTER UPON

***** PEOPLE'S RIGHTS NETWORK *****

PERSONALLY AT: 4615 HARVEST LN EMMETT ID 83617

WITHIN THE COUNTY OF GEM, STATE OF IDAHO.

COMMENTS: RECEIVED AND PROCESSED ORDER AWARDING FEES, AND ORDER GRANTING IN PART, DENYING IN PART MOTION FOR FURTHER SANCTIONS AND RENEWED MOTION FOR CONTEMPT AGAINST AMMON BUNDY AND ORDER GRANTING MOTION FOR PRELIMINARY INJUNCTION ON 10/14/2022. ON 10/15/2022 AT 11:30 286 SERVED AMMON BUNDY.

DATED THIS 17TH DAY OF OCTOBER 2022.

DONNIE WUNDER
SHERIFF

SHERIFF'S FEES:	50.00
TOTAL COLLECTED TO DATE:	50.00
AMOUNT UNCOLLECTED:	0.00

BY

SHAWN DILLON
SERVING OFFICER

BY

TANYA VAUGHN
RETURNING OFFICER

EXHIBIT C

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	<input checked="" type="checkbox"/> E-mail
Diego Rodriguez	freedommanpress@protonmail.com	<input checked="" type="checkbox"/> 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

Ammon Bundy
4615 Harvest Lane
Emmett, ID 83617 By E-mail By mail

Ammon Bundy for Governor
P.O. Box 37
Emmett, ID 83617 By E-mail By mail

Peoples Rights Network
4615 Harvest Lane
Emmett, ID 83617 By E-mail By mail

Freedom Man PAC
C/O Diego Rodriguez
9169 W. State Street, Ste. 3177
Boise ID 83714 By E-mail By mail

Freedom Man Press LLC
C/O Diego Rodriguez
1317 Edgewater Dr. #507
Orlando, FL 32804 By E-mail By mail

Trent Tripple
Clerk of the Court

Dated: 01/19/2023

By: Janine Korsen
Deputy Clerk



EXHIBIT D

January 20, 2023

VIA HAND DELIVERY

Ammon Bundy
Ammon Bundy for Governor
Peoples' Rights Network
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Mr. Bundy:

The court entered the enclosed protective order yesterday and served copies by mail. You personally are on notice of the Court's order. People's Rights Network and Ammon Bundy for Governor are on notice because you, their representative, have been served the protective order.

You and any officer, agent, employee of People's Rights Network or Ammon Bundy for Governor 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, Laura Thompson, Chris McCurdy, Dr. Rachel Thomas, Blake Higley, Judge Annie McDevitt.

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, People's Rights Network, and Ammon Bundy for Governor must cease and desist the harassment, intimidation, and threats. A non-exhaustive list of examples of such harassment, intimidation, and threats includes:

(1) "Come No More Upon Me, a Warning Letter from Ammon Bundy" published at <https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammon-bundy/> and https://www.peoplesrights.org/news_view?/come-no-more-upon-me-a-warning-letter-from-ammon-bundy&id=f6984a7c-eafc-4082-a3b4-e99dfe129733;

(2) Calls to action inciting harassment of and threats against individuals, including Judge McDevitt, Chris Roth, and the attorneys at my firm, for example: https://www.peoplesrights.org/news_view?/cta-ways-to-assist-our-neighbor-ammon-bundy&id=ced66bb6-280e-4a1c-9b4e-6e6b1f66e10a and

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.

(3) Defamatory statements designed to incite violence against individuals involved in the Department of Health and Welfare's intervention on behalf of the infant grandson of Diego Rodriguez, for example: https://www.peoplesrights.org/news_view/?baby-wrongfully-torn-from-arms-of-mother-in-meridian-idaho&id=f854bfa9-8c78-4aef-b768-0c5e55791fe3.

Take down the webpages linked above by 2 p.m. Monday, January 23, 2023.

Stop the harassment. Stop the intimidation and threats. Submit to the legal process. Your actions caused great damage and 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. This should not have happened, and my clients are committed to doing all they can to make sure it never happens again.

You are not above the law.

Sincerely,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:njh

Enclosure

20730917_v1

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 Bringham. 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	<input checked="" type="checkbox"/> E-mail
Diego Rodriguez	freedommanpress@protonmail.com	<input checked="" type="checkbox"/> 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

Ammon Bundy
4615 Harvest Lane
Emmett, ID 83617 By E-mail By mail

Ammon Bundy for Governor
P.O. Box 37
Emmett, ID 83617 By E-mail By mail

Peoples Rights Network
4615 Harvest Lane
Emmett, ID 83617 By E-mail By mail

Freedom Man PAC
C/O Diego Rodriguez
9169 W. State Street, Ste. 3177
Boise ID 83714 By E-mail By mail

Freedom Man Press LLC
C/O Diego Rodriguez
1317 Edgewater Dr. #507
Orlando, FL 32804 By E-mail By mail

Trent Tripple
Clerk of the Court

Dated: 01/19/2023

By: Janine Korsen
Deputy Clerk



EXHIBIT E

I made a peace offering, let's see if they take it.

UPDATE 2

📅 Jan 21, 2023 🕒 Jan 21, 2023

🔗 Permalink (Alt)

UPDATE: I MADE A PEACE OFFERING, LETS SEE IF THEY WILL TAKE IT.

January 21, 2023

Yesterday while I was out, two people came to the front door of my home and served my family with more legal papers from St. Luke's. The amount of mail and people serving legal papers (whether it be private servers or a sheriff deputy) coming to our home and mailbox is becoming extremely harassing. We are receiving typically at least a ream-size amount of papers weekly, many times much more. St. Luke's CEO, Chris Roth has authorized undefined amounts of funds to the Holland & Hart law firm to overwhelm the court with legal filings, motions and injunctions, seeking to ruin what finances and reputation I have left, (Diego too). There is simply no way I can respond to all the court filing or legal action from St. Luke's. I was told by an Idaho law firm that it would take at least 3 full time attorneys to respond to Holland & Hart's court filings on this case. I am certain St Luke's must have already accrued hundreds of thousands in attorney fees to pay for such a legal assault. Holland & Hart attorneys are not cheap. If I was to try and respond to every legal document sent to me it would have already cost myself nearly a hundred thousand dollars in legal fees, if not more. On top of that, I would be required to spend my entire life organizing a legal defense against St. Luke's.

The action from Holland & Hart, led by Eric Stidham is an extreme abuse of the Idaho courts and I am surprised that Judge Lynn Norton has allowed it to go on for this long. The Holland & Hart law firm has a lot of pull and I am certain Judge Norton is intimidated by them and the power they wield in Idaho. After all, Holland & Hart also represents Governor Little, former Speaker of the House Scott Bedke (now Lieutenant Governor) and the most powerful lobbyist group in Idaho, IACI. I don't envy the position she is in. Nonetheless, the courts should not allow themselves to be manipulated into becoming a tool for powerful people with endless funds trying to crush political enemies. But, when one looks at the history of courts, this type of abuse is a common occurrence. Just read the Bible or a few history books.

Without looking closely into the TWO St Luke's cases against me (1-CRIMINAL, 1-CIVIL), it may seem a bit confusing in what St. Luke's executives are trying to do to me. With the CRIMINAL case, St. Luke's is claiming to be a victim of mine for when I went to their Meridian hospital demanding that they give baby Cyrus back to his parents (see details above). The CIVIL case is a lawsuit against Diego (baby Cyrus' grandfather) and I for speaking out against the actions of St. Luke's employees, CPS staff and Meridian police officers in taking baby Cyrus (read details above). In the CRIMINAL case, I have had no choice but to participate and show up to court or Judge McDevitt will send officers to kick in my door, terrorize my family and haul me off to jail; eventually pronouncing a sentence upon me. The CIVIL case is different. I must bear the cost of the legal defense (if I choose to have one). With the amount of legal preceding coming from Holland & Hart in this case, there is no way I can bear the expense (time or money) to defend myself, nor do I want to spend the next 5 years full-time doing so (I have a family that I must provide for and tend to).

If Judge Norton does not see what is happening here and chooses not to stop it, eventually, she will grant St. Luke's executives "punitive damages" and expenses to be paid for the massive amount of legal fees that Holland & Hart attorneys have and will accumulate, and will order the Gem County Sheriff to take everything I own. Without going into hundreds of thousands of dollars in debt for legal fees, and spending the next several years fighting full-time, there is no way to legally fight against them. This is how the rich and powerful punish those who expose and stand up to them. Remember they took a baby from loving, caring parents without true cause and I simply stood for the family exposing the truth (see above for details).

So, with all of this going on, yesterday I made a peace offering to St. Luke's executives and settled the CRIMINAL case outside of court. Agreeing to a fine and a suspended sentence of 90 days jail. I have never done this before and it is certainly not my style. I prayed and pondered about this move for many days. I did not purger myself and kept this agreement within the moral boundaries that all of us must live by as children of God. This was not an act done in fear or desperation. This agreement will become official on Monday, so I will not be having a trial anymore. There is no need for people to come to the court-house to support me in trial any longer. Thank you so very much! Now be aware, the judge could reject the agreement and force me to trial, but that is extremely rare and would make her (Judge Annie McDevitt) look even more like the prejudiced judge she is.

My desire, in all I have done, was never to overturn the courts and make the judges start administering justice as the law prescribes. I never wanted to spend my life fighting in the courts. In-fact, after coming home from being in federal prison for two years - never convicted of even one charge - and going through two major federal trials, my desire was to never enter a courtroom again. I only wanted then, and still today, to be left alone. So, making this agreement in the CRIMINAL case is an effort to extend an olive branch to St. Luke's executives. To show that I simply want to be left alone. That I didn't just wake up in the middle of the night, drive an hour to one of their hospitals and cause a scene, because I hate them and wanted to cause them trouble. That I did not rally people to peacefully demonstrate outside one of their hospitals, several days in a row, because I despised them or wanted revenge for something. Making this peace offering I pray will serve as another testimony that I have tried from the beginning to only stand for my fellow man and do what is right before God. I pray that this olive branch will be accepted and that all of us can go about our way in peace.



Ammon Bundy

Attachments

 protective-order.pdf (126 KB)

 View 3 Comments

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

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(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.



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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	<input checked="" type="checkbox"/> E-mail
Diego Rodriguez	freedommanpress@protonmail.com	<input checked="" type="checkbox"/> 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

Ammon Bundy
4615 Harvest Lane
Emmett, ID 83617 By E-mail By mail

Ammon Bundy for Governor
P.O. Box 37
Emmett, ID 83617 By E-mail By mail

Peoples Rights Network
4615 Harvest Lane
Emmett, ID 83617 By E-mail By mail

Freedom Man PAC
C/O Diego Rodriguez
9169 W. State Street, Ste. 3177
Boise ID 83714 By E-mail By mail

Freedom Man Press LLC
C/O Diego Rodriguez
1317 Edgewater Dr. #507
Orlando, FL 32804 By E-mail By mail

Trent Tripple
Clerk of the Court

Dated: 01/19/2023

By: Janine Korsen
Deputy Clerk



EXHIBIT F



UPDATES 4

BABY WRONGFULLY TORN FROM ARMS OF MOTHER IN MERIDIAN, IDAHO

Baby Cyrus Anderson, was forcibly and unjustifiably ripped from mother's arms.

Case Mar 12, 2022 Mar 18, 2022

4,013 134 4

Utah 3A, Utah 3B

Share (Alt)



BABY CYRUS WAS KIDNAPPED!!! to full story here:

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

Event Timeline:

1. Baby Cyrus Anderson taken to hospital because baby had fever and was dehydrated.
2. Hospital didn't want to release baby because they are a business. (Of course not! "Check please!") Dr. Dykstra threatened to call CPS if the Andersons left early. The Andersons received permission to leave next day but were required to attend daily weigh ins.
3. Baby Cyrus attended 2 weigh ins and was doing great. Mom became sick and missed 3rd weigh in. She was arrested at midnight and baby Cyrus was kidnapped by Child Protective Services and Meridian Police.

4. As of Sunday morning Baby Cyrus rejects formula as he is breast fed. Lawyers from the family have been kicked out of the hospital.

Kidnapping of Baby Cyrus



Here's an official link approved by the family to help with the family's enormous expenses, made possible by evil government actors with unlimited funds : https://givesendgo.com/babycyrus?utm_source=sharelink&utm_medium=copy_link&utm_campaign=babycyrus

To add evil to evil, the mother, the grandfather, Ammon Bundy, Wendy Kay were all arrested by the police without probable or good cause.

This why People's Rights exists.

What you can do (professionally and without vulgar language or threats of violence):

1. **Director at Department of Health and Welfare which directs CPS.**

Child support

Phone

[800-356-9868](tel:800-356-9868)

Email

ChildSupport@dhw.idaho.gov

2. **Call CPS 855-552-5437**

4. Donate to the official family legal fund at :

[https://givesendgo.com/babycyrus?](https://givesendgo.com/babycyrus?utm_source=sharelink&utm_medium=copy_link&utm_campaign=babycyrus)

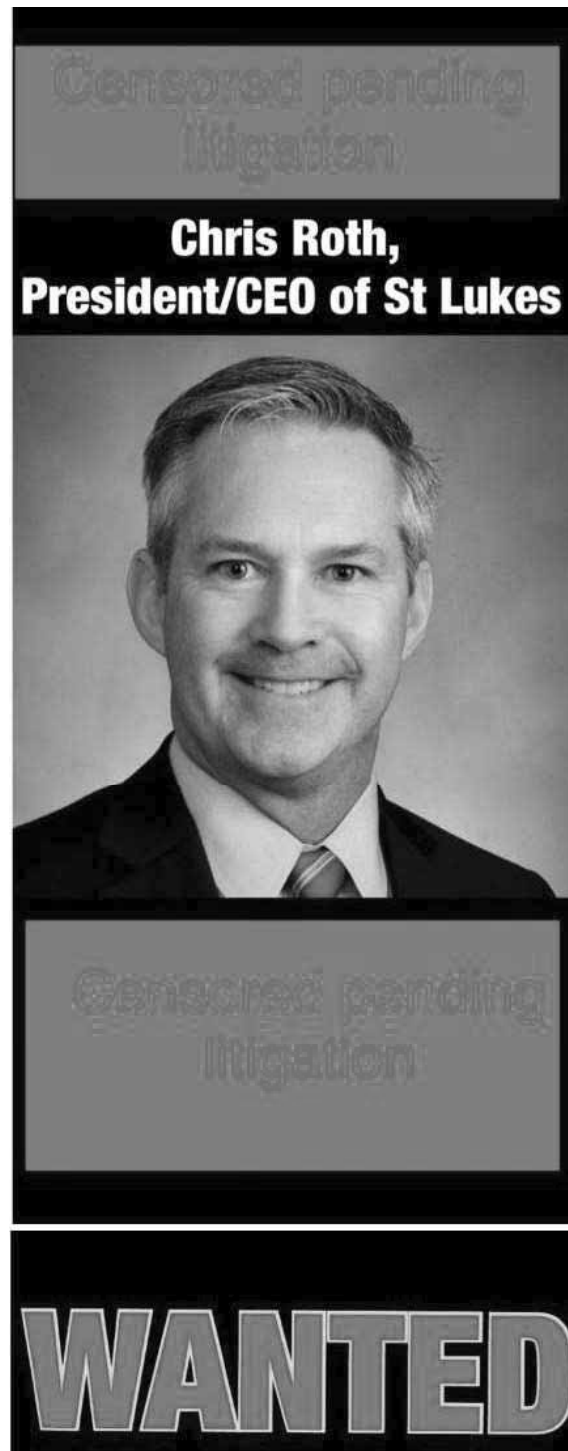
[utm_source=sharelink&utm_medium=copy_link&utm_campaign=babycyrus](https://givesendgo.com/babycyrus?utm_source=sharelink&utm_medium=copy_link&utm_campaign=babycyrus)

WANTED

**Ada County
Sheriff Matt Clifford**



**Criminal accessory
of child abduction
and deprivation of
rights under color of law.**



Chris Roth claims to work for a Non-Profit organization but is paid over \$8.2 Million a year. That's over \$3900 per hour. He is suing Ammon Bundy, People's Rights and Baby Cyrus' family for damages that he claims they caused him. This man knew what was happening to Baby Cyrus and continued to allow it to happen without any public word or action against it.

Note: Baby Cyrus' case was dismissed shortly after the family got Baby Cyrus back proving that Idaho CPS, St. Luke's, Meridian Police and the Judge were all wrong.

So yes, Chris Roth is WANTED! He is WANTED by the people to do what is right!

Plea: Drop the lawsuit against Baby Cyrus' family and Ammon Bundy. Chris Roth you don't need any more money than you already receive. Your organization gets millions of dollars of public funds each year and you personally profit handsomely.

(8.2 million annually)

WANTED

**Aaron Dykstra, DNP, FNP-C
Pediatric Functional Practitioner**




St. Luke's Hospital in Meridian Idaho

Phone: 1-208-385-7711

**Child trafficking
and abduction**



 View 4 Comments

Baby Cyrus is HOME WITH ALL HIS FAMILY!!!!!!!!!!

UPDATE 4

 Mar 18, 2022  Mar 18, 2022

 [Permalink \(Alt\)](#)

Baby Cyrus was returned home today! It's a miracle! You know who made the miracle happened? YOU!!!

The pressure was brutal on them. Patriots from Idaho, Utah, Oregon, Montana and other states heard the call and answered. People's Rights is a big part of it!

If they do it to you they are doing it to me! Don't let up!! There is still a fight.

WATCH!

Baby Cyrus Was Returned Home Today!!



Go to this link from Baby Cyrus' grandfather, the source! <https://www.freedomman.org/cyrus/>.

 [View Comments](#)

Baby Cyrus Pray, Protest, Press Conference at 5PM Today March 17th

CALL-TO-ACTION! 

 Mar 17, 2022  Mar 17, 2022  Mar 17, 2022, 2:58 pm MDT → Mar 23, 2022, 2:59 pm MDT

 [Permalink \(Alt\)](#)

PRAYER AND PROTEST TODAY, MARCH 17TH - 10:00 am - 5:00 pm

PRESS CONFERENCE @ 5:00 PM

HEALTH AND WELFARE DEPARTMENT

450 W State St, Boise, ID 83702

WHAT CAN YOU DO TO HELP?

1. Be a Keyboard Warrior - there is a ton you can do from your keyboard.

For example:

- Send emails to Health and Wellness and demand that Baby Cyrus go home. These are the emails to the officials and executive staff and Health and Wellness along with the judge: dave.jepesen@dhw.idaho.gov, miren.unsworth@dhw.idaho.gov, lisa.hettinger@dhw.idaho.gov, cameron.gilliland@dhw.idaho.gov, kelly.shoplock@dhw.idaho.gov, lfortier@adaweb.net, ChildSupport@dhw.idaho.gov

- Go crazy on Twitter, Facebook, Instagram, and more and post the truth and combat the false narratives.

- Send emails and messages to your friends, neighbors, and more to

get informed about this case.

2. Call Health and Welfare - 800-356-9868 (here's the contact info

page: <https://healthandwelfare.idaho.gov/contact-us>)

3. Help us get media interviews - do whatever you can to get us media coverage. Contact anybody and everybody who has a platform and have them contact me at contact@freedomman.org

4. Make a donation - again, you can make a donation

at: <https://givesendgo.com/babycyrus>

5. Stand with us in protest (for those who are local) - we are asking everyone to protest in front of Health and Welfare in Boise from 10:00 am 5:00 pm every day until Baby Cyrus comes home.

6. Pray for Baby Cyrus - please do not discount the power of prayer. That is what has carried our family through up to this point. And it is the only thing that will sustain us through the end of this nightmare...

Thank you so much for your support and your help! TODAY we will have our PRESS CONFERENCE at 5:00 pm at Health and Welfare.

PRAYER AND PROTEST TODAY, MARCH 17TH - 10:00 am - 5:00 pm

PRESS CONFERENCE @ 5:00 PM

HEALTH AND WELFARE DEPARTMENT

450 W State St, Boise, ID 83702

 View Comments

Baby Cyrus' Criminal Actors Being Sought by We the People

UPDATE 3

 Mar 17, 2022  Mar 17, 2022

 [Permalink \(Alt\)](#)

Here are the criminals with a license to kidnap babies from their nursing mothers:

If you know where baby Cyrus is please go here: peoplesrights.org/cyrus



Natasha Erickson, St. Luke's Doctor

(She was the first to call CPS simply because Marissa and Levi asked to leave St. Luke's after Cyrus first got his IV and was rehydrated. She threatened to call CPS if they decided to leave early, so Levi and Marissa stayed. She called CPS anyway and a social worker came to "interview" Marissa—putting Marissa and Levi on "watch" with CPS. This was the initial trigger that got everything started.)



Judge Laurie Fortier

(She is the unjust judge who is beyond corrupt and disgusting—who is responsible for destroying the lives of thousands of Idahoans and is directly responsible for the kidnapping untold numbers of children from the homes of good families. The depth of her wickedness and corruption will be exposed).



Aaron Dykstra, Functional Medicine of Idaho

(He is the Nurse Practitioner who contacted CPS simply because Marissa canceled Cyrus's weigh-in appointment).



Nice Loufoua, Social Worker

(She is the social worker who contacted the police to start the kidnapping process.)



Meridian Police Detective Hanson Badge # 3534

(This is evil and wicked animal who ripped Baby Cyrus out of Marissa's arms. He is the actual KIDNAPPER.)



Meridian Police Detective Fuller Badge # 3138

(He is the detective in charge of the case. He has the greater sin (John 19:11).

Read this investigative report from Valiant News: <https://valiantnews.com/2022/03/idaho-social-worker-removes-baby-from-conservative-parents-after-expressing-racial-preference-for-people-of-color/>

If we let the criminals get away with the abuse perpetrated on this young, beautiful family what responsibility do we carry in all this? Please go here if you know where baby Cyrus is: peoplesrights.org/cyrus



Diego update after the hearing



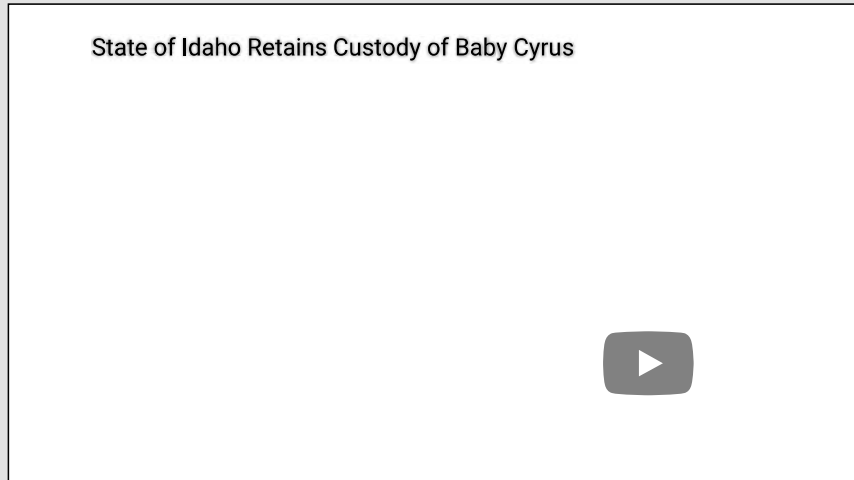
 View Comments

Mar 16, 2022 Mar 16, 2022

Permalink (Alt)

Sara Brady Reports from the Courthouse in ADA County, IDAHO. The state of Idaho keeps custody of Baby Cyrus. Next hearing April 8.

This is how the state abuses good people and endager the lives of minors in a child trafficking scheme. HIDE YOUR CHILDREN FROM THE GOVERNMENT, POLICE AND CPS! #SaveBabyCyrus



View Comments

Mar 15, 2022 Mar 16, 2022

Permalink (Alt)

posted on her Facebook account on 3/16/2022

FREEDOM FAMILY!!! YOU HAVE TO READ THIS!!!

Tell me how the baby is in "imminent danger" if you're just going to hand it off to another unknown adult and send baby home with them?!

From the families website:

"EMERGENCY UPDATE - Prayer & Protest Tomorrow at Courthouse @ 12:00 pm

We have had some incredible developments today since our last Press Conference! I can't reveal everything to you right now, but I want to tell you two very specific things. First of all, we have documented evidence that protests outside of the hospital in support of Baby Cyrus worked and are working!

Today, we got a hold of some of Cyrus's medical records from St. Luke's. Interestingly enough, they refused to give Levi the medical records from March 1st - March 4th when Cyrus was in the care of St. Luke's physicians and was discharged with a clean bill of health. It is evident and obvious that they don't want Levi and Marissa to have access to those records because they would be damning to the prosecution and would contradict any case they try to make that Baby Cyrus was in imminent danger of any sort.

But we did find this interesting admission: "[Baby Cyrus] was brought to the Meridian ED for evaluation. Health and welfare identified a foster family but due to the protesters surrounding the hospital regarding this case, it was felt that discharge with the foster family from the ED was unsafe for all involved. For this reason, the patient was transferred to Boise for further care."

This literally means that protestors in front of the hospital on the night Baby Cyrus was kidnapped literally prevented Baby Cyrus from being put into the home of strangers where only God knows what could have happened to him! Read it for yourself:

*Medical records shared publicly with the consent and permission of Levi and Marissa Anderson.

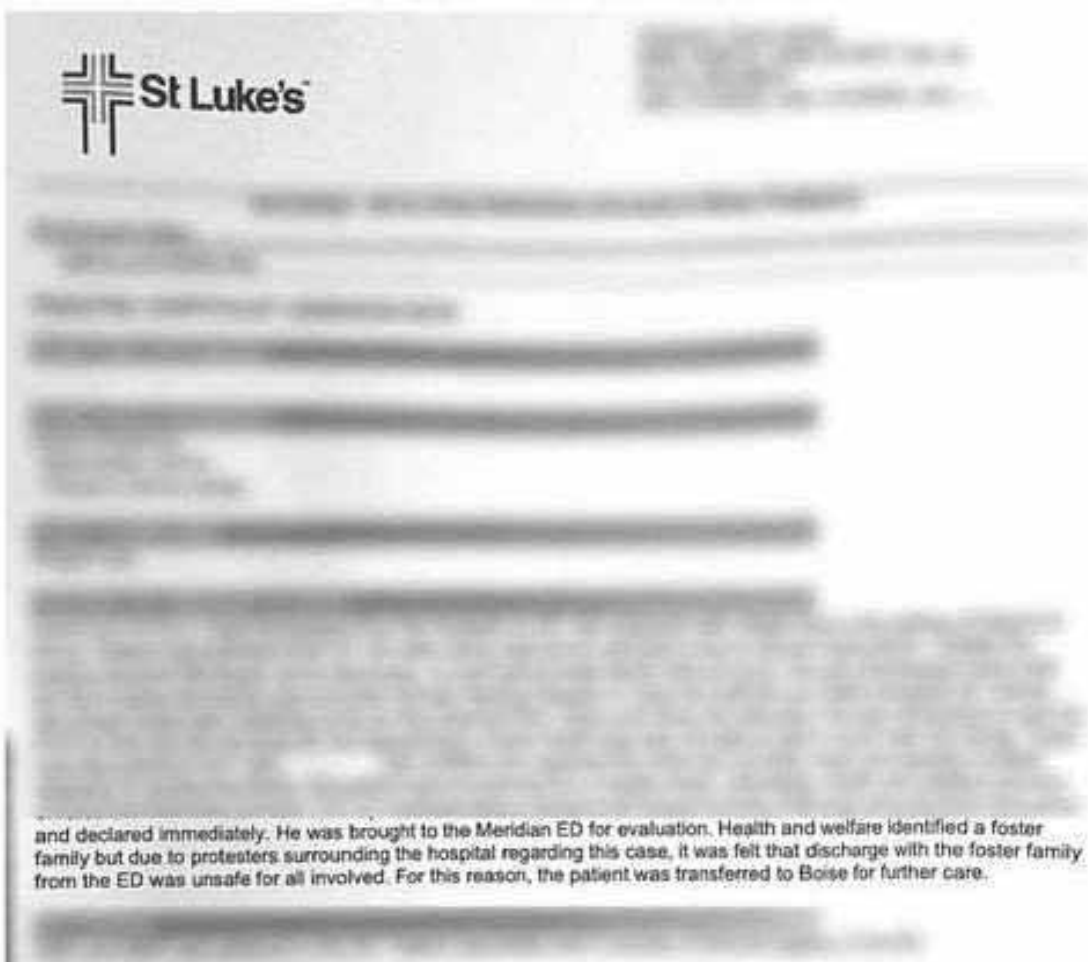
THIS IS DEMONSTRABLE EVIDENCE THAT YOUR PROTESTING WORKS!!! So let's keep it up! Tomorrow the hearing is at 1:00 pm at the Ada County Courthouse (200 W Front St, Boise, ID 83702). Please show up to both PRAY and PROTEST! If the judge doesn't rule to dismiss this case tomorrow, then Levi and Marissa won't get another chance for justice for 30 days! 🙏 Protesting saved Baby Cyrus last week. And if

enough of you show up to blanket him in your prayers and demonstrate your PROTEST for all the world to see—you just might be able to save him again! Please come and support Baby Cyrus tomorrow at 12:00 noon!

Now, there is a second key component to this admission on the part of the hospital, that is 100% damning to their case. Notice it says that "Health and Welfare had already identified a foster family" but decided not to discharge Cyrus with the foster family because they felt it was "unsafe." Well...their entire case is built around the lie that "Baby Cyrus was soooo sick and malnourished that he needed to be in the care of doctors and medical professionals in the hospital." But this is an absolute lie as they admit in their medical report above that they had already planned on immediately discharging Cyrus with a foster family! So evidently Baby Cyrus was not in any type of medical emergency whatsoever! It was all a lie!

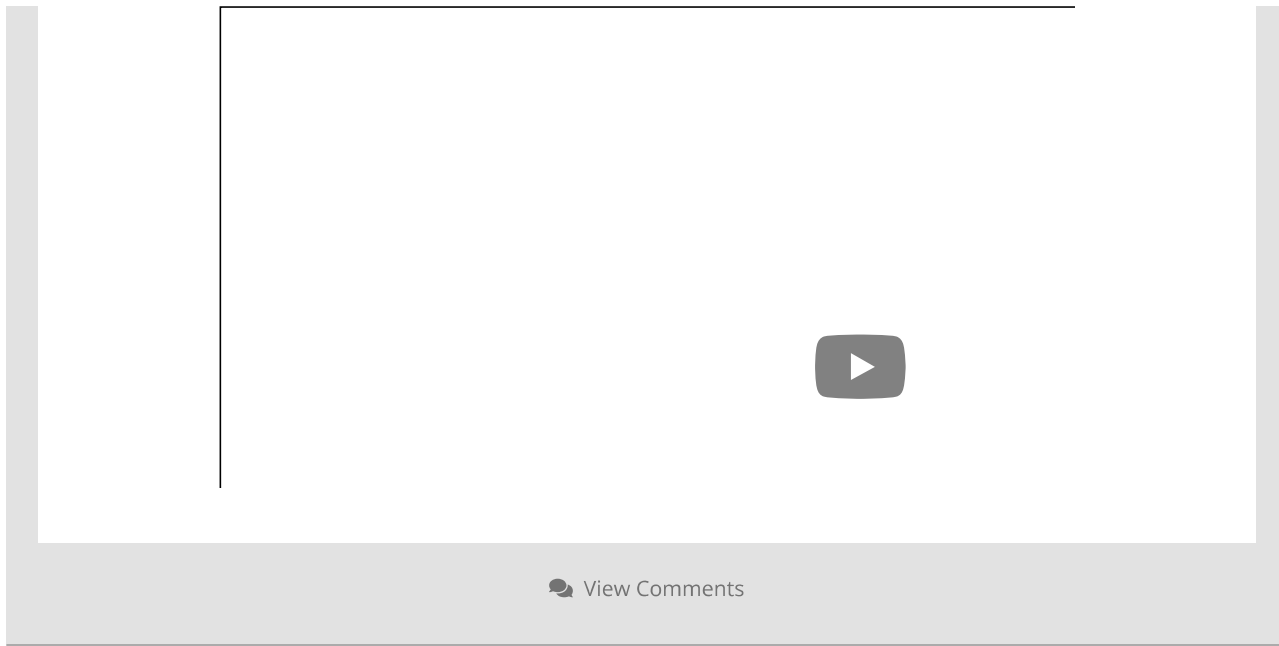
This evidence (and a whole lot more) has come to light in the very short time our legal team has had to prepare. Please keep praying and pushing. And for those who want to know what else you can do, here's a short list:

1. Show up to pray and protest tomorrow at the Ada County Courthouse at 1:00 pm.
2. Sign the petition: <https://www.change.org/p/send-baby-cyrus-home> (don't "chip in" because this money doesn't go to the family, instead donate below)
3. Make a donation to help with all the expenses: <https://givesendgo.com/babycyrus>
4. Keep sharing the website: <https://freedomman.org/cyrus>
5. Pray pray pray



**Medical records shared publicly with the consent and permission of Levi and*

Marissa Anderson.



 Spread It! 


Copy Link

Alternate Link

COPY

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



 Back to Newsroom

Doctor that Called in CPS...

UPDATE 2

Mar 12, 2022 | Mar 12, 2022

Perrinink (AK)

Please light up his phone, and fill his email with your thoughts...



Dr. Aaron Dykstra is a pediatrician at Functional Medicine of Idaho. He initiated the horrific event that has led to the medical kidnapping of baby Cyrus. Call, leave messages, email, tell your friends and demand an explanation, immediately.

This behavior is unacceptable!

Phone: 1-208-385-7711
Email: info@funmedidaho.com



PROTEST DAILY FOR BABY CYRUS

 Event  Mar 16, 2022

701 **10**

 [Idaho 11](#)

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SHARE!! BRING OTHERS

PROTEST DAILY! PLEASE BOUNCE AROUND LOCATIONS SO WE HAVE COVERAGE THROUGHOUT THE DAY. OUR PRESENCE AT DYKSTRA HOME AND FMI EAGLE, HIS PLACE OF EMPLOYMENT WORKED !! HE HAS RELEASED A STATEMENT THAT WILL BE DISCUSSED TODAY AT PRESS CONFERENCE 6PM. IT WAS SATISFACTORY ENOUGH AT THIS POINT THAT IT WAS DECIDED TO SHIFT FOCUS NOW TO THE OTHER OFFICER AND SOON THE SOCIAL WORKER. PLEASE KEEP THE HEAVY PRESSURE.DO WHAT YOU CAN WHEN YOU CAN.

PRESENCE NEEDED AT FOLLOWING LOCATIONS:

ST LUKE'S HOSPITAL

BETWEEN 10AM - 8PM

Steve HANSEN RESIDENCE

6091 E. Path Dr. Nampa

10AM - 12PM / 3 -8PM

FULLER RESIDENCE

9606 Cherry Lane Nampa

10AM - 12PM /3- 8PM

Update:

Baby has been moved to Foster Care 3/15/22.

Shelter Hearing,arrive by 12:30pm

Wednesday 16th, 1:00pm

Ada County Courthouse

PRESS CONFERENCE DAILY 6PM

ST LUKE'S HOSPITAL BOISE

PERPETRATOR	PERPETRATOR	PERPETRATOR	PERPETRATOR
			
HI NEIGHBOR! Did you know that our neighbor... Steve Hansen 8081 E. Pugh Dr. Farmington, Idaho	HI NEIGHBOR! Did you know that our neighbor... Jeffery Fuller 9028 Cherry Ln. Farmington, Idaho	HI NEIGHBOR! Did you know that our neighbor... Aaron Dykstra 1584 Le Ronda Way Middletown, Idaho	HI NEIGHBOR! Did you know that our neighbor... Nice Loufoua 1712 S. Lakeside Ave. Boise, Idaho
...recently helped in the abduction of a young child, Cyrus Anderson, from the living arms of his young mother? She was promised she would be able to reconnect with her son. Did this man appear and COMPLETE LI , and once out of public eye, he ordered her able to her young son... her mother father or mother has been from that since.	...recently helped in the abduction of a young child, Cyrus Anderson, from the living arms of his young mother? She was promised she would be able to reconnect with her son. Did this man appear and COMPLETE LI , and once out of public eye, he ordered her able to her young son... her mother father or mother has been from that since.	...recently decided that he had more authority over and control over his young Cyrus Anderson than his own loving parents? Because they missed a non-life-threatening medical appointment, he ordered CPS to collaborate with local "Peace Officers" to abduct the boy from the mother's father or mother has been from that since.	...recently decided that she had more authority over and control over her young Cyrus Anderson than her own loving parents? Because they missed a non-life-threatening medical appointment, she collapsed with local "Peace Officers" to abduct the boy from the mother's father or mother has been from that since.
We thought you should know this so you can keep a close eye on your own children.	We thought you should know this so you can keep a close eye on your own children.	We thought you should know this so you can keep a close eye on your own children.	We thought you should know this so you can keep a close eye on your own children.
<small>More Details Here...</small>	<small>More Details Here...</small>	<small>More Details Here...</small>	<small>More Details Here...</small>

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Call to Action

Stand for parents against medical kidnapping

Info Mar 17, 2022

685 49 1

Washington 5

Share (Alt)

As we reported last week, there is a terrible situation unfolding with our neighbors in Idaho.

Updates can be found at <https://freedomman.org/cyrus/>

For now, here is a list of action items that has been shared on their website:

WHAT CAN YOU DO TO HELP?

1. Be a Keyboard Warrior - there is a ton you can do from your keyboard. For example:

- Send emails to Health and Wellness and demand that Baby Cyrus go home. These are the emails to the officials and executive staff and Health and Wellness along with the judge: dave.jeppesen@dhw.idaho.gov, miren.unsworth@dhw.idaho.gov, lisa.hettinger@dhw.idaho.gov, cameron.gilliland@dhw.idaho.gov, kelly.shoplock@dhw.idaho.gov, lfortier@adaweb.net, ChildSupport@dhw.idaho.gov
- Go crazy on Twitter, Facebook, Instagram, and more and post the truth and combat the false narratives.
- Send emails and messages to your friends, neighbors, and more to get informed about this case.

2. Call Health and Welfare - 800-356-9868 (here's the contact info page: <https://healthandwelfare.idaho.gov/contact-us>)

3. Help us get media interviews - do whatever you can to get us media coverage. Contact anybody and everybody who has a platform and have them contact me at contact@freedomman.org

4. Make a donation - again, you can make a donation at: <https://givesendgo.com/babycyrus>

5. Stand with us in protest (for those who are local) - we are asking everyone to protest in front of Health and Welfare in Boise from 10:00 am 5:00 pm every day until Baby Cyrus comes home.

6. Pray for Baby Cyrus - please do not discount the power of prayer. That is what has carried our family through up to this point. And it is the only thing that will sustain us through the end of this nightmare...

Thank you so much for your support and your help! Tomorrow(March 17, 2022) we will have our PRESS CONFERENCE at 5:00 pm at Health and Welfare.

View 1 Comment

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 Back to Newsroom



PLEASE EXPOSE "OFFICER" SEAN KING, IDAHO'S FINEST GROPER

Sean King, without probable cause or necessity, groped MARRISA ANDERSON, after having been frisked and shaken down earlier by police and after having her baby ripped from her.

Case Apr 6, 2022 Apr 6, 2022

954 17

Utah 3A

Share (Alt)

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

Sean King, previously resigned from the Caldwell Police Dept in Idaho for alleged sexual misconduct, and following a pattern by the band of brothers, aka, police, they hired him on to the Meridian Idaho police department in spite of his previous record.

Please read the above link for more details.

After you are thoroughly nauseated by what you see, please take action against this pervert by calling the Meridian police department and expressing your disgust.

King could have called over a female officer, but even that was not necessary as she had already been groped earlier by other police officers. This was a case of sexual harassment and abuse.

View Comments

Please call Meridian Idaho Police Dept (208) 888-6678 to express your disgust

CALL-TO-ACTION!

Apr 6, 2022 Apr 6, 2022 Apr 6, 2022, 3:37 pm MDT → Apr 30, 2022, 3:37 pm MDT

Permalink (Alt)

After becoming outraged by the above story in the newsroom, please express your disgust that we have to be exposed to officers like Sean King, and be at his mercy on or near Meridian.

(208) 888-6678

View Comments

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 Back to Newsroom



Come no more upon me, a warning letter from Ammon Bundy

UPDATES 3

Now, in less than a week, I will be forced to defend myself again in trial, facing a team of government attorneys, for peacefully standing outside St. Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me. By the time I get out, St. Luke's executives and Holland & Hart partners with help from a few Ada County Judges will do their best to strip my family from anything we have

left.

Case Jan 17, 2023 Jan 24, 2023

11,021 185 27

idaho 1N, idaho 2, idaho 4NE, idaho 4NW, idaho 4SE, idaho 4SW, idaho 5, idaho 6, idaho 7, idaho 8, idaho 9, idaho 10, idaho 11, idaho 12, idaho 13, idaho 14, idaho 15 Share (Alt)

From: Ammon Bundy

To: Blake Higley; Scott Bedke; Whitney Welsh; Chris Roth; Anne McDevitt; Erik Stidham; Brad Little; Keith Reynolds;

RE: Warning

I Ammon Bundy respectfully come seeking relief that my family and I may live in peace and not be harassed at your hands anymore.

As much as it pains me to do so, it is my duty to plead my case to you in why I have acted the way I have over the past few years. I pray that you will understand my intentions and see how my actions have been based in love for God and my fellow man, including yourself.

In February of 2020 I made a vow that I would not live or allow my family and friends to be compelled to live under the delusional control of tyrants pushing lockdown mandates using health orders as the excuse. I made this vow immediately after becoming aware of what officials in the state of California were doing to the people in that area. I had hoped that the same type of action would not come to Idaho, but my hopes were in vain, as in mid-March of 2020, Brad Little, Governor of Idaho, issued a statewide stay-home-order, much like California's Governor Gavin Newsom did earlier that month.

Knowing very well that no state or other official has been granted the authority to order my friends, family or I to remain in our homes until we have their permission to leave. Knowing that no man or group of people have the right to order other men or women to stop trading with each other in an effort to provide for their families. Knowing that no man or group of people have the right to order other men or women not to visit and care for each other. Knowing that state officials have only been granted authority enumerated in the state and United States Constitutions. Knowing above all things that the right to travel, the right to visit with and care for each other, the right to leave our homes at will, the right to trade and provide for our families are endowed by God the Almighty Creator to each of His children residing upon this earth, and that no government official has the authority to alienate these rights from His children unless in defense of their own rights.

Knowing these things, I began to act openly in peaceful defiance of the immoral and unconstitutional usurpations coming from government officials within the state of Idaho. Holding regular public meetings, an Easter service, peacefully protesting at a Meridian police officer's home for arresting a mother who took her children to the park and organizing people to peacefully stand for the rights that God had given them. Never once did I damage any property, commit any violence or harm any person. It is not in my nature to do so.

However, these simple peaceful acts of non-compliance caused heads of several government agencies to communicate with each other about what should be done with Ammon Bundy. In one email chain between the head of the Idaho State Police, Colonel Kendrick Wills, Meridian Police Chief, Meridian Mayor, Robert Simison, the FBI JTTF (Joint Terrorist Task Force), Ada County Sheriff, Steve Bartlett, and several other heads of government agencies and offices in Idaho, all discussed to potentially raid the Easter service I had planned and mass arrest those attending. Imagine, in the United State of America, in the State of Idaho, heads of law enforcement and other officials plotting to raid a Christian worship service on Easter. And doing so because those assembling to worship God did not have permission from government officials to do so. Ultimately, these officials decided not to move forward with the raid and mass arrests because the Easter service was held in Gem County on private property. It is my belief that the Gem County Sheriff and Emmett Mayor did not support the action so they did not move forward with the raid.

In August 2020, Governor Little called for a special legislative session to gain legal immunity for the action of state officials during the lock-down orders. When the session began, hundreds of people came to the Idaho capitol building to attend. However, Scott Bedke, Speaker of the House, ordered the House gallery doors to be locked, guarded by Idaho State Police Troopers; stopping hundreds of people from legally attending the session. This caused many people to become very upset and eventually we pushed our way through the locked doors. I must mention that Idaho State law prohibits the doors to the House or Senate galleries from being locked at any-time during a regular or special session. Regardless, this law did not seem to matter to Speaker Scott Bedke or to the Idaho State Police Troopers. In-fact, instead of apologizing to the people for illegally blocking the doors, the next day, nearly half of the all the ISP Troopers in Idaho were ordered to report for duty at the capitol building. That afternoon an incident with the independent media was fabricated and I was arrested. My crime was sitting quietly and non disruptive in a public room in the Idaho capitol building (the Lincoln auditorium), during open hours, where no proceedings were taking place. The Lincoln auditorium doors were always open to the public until 7 PM each day. However, that day, at 5 PM, over 60 police officers entered the room and area and ordered me to leave. When I did not leave immediately, I was arrested and trespassed from the capitol building for a year. During my trial, over a year later, multiple police officers testified that I was *"not being disruptive and had broken no rules"*(please watch this video).

I do admit, at this point I became somewhat irrational. For I believed that I had a right to go into the Idaho capitol building and participate in the legislative process. I believed that the capitol building belonged to the people and not the government. I believed that somehow the people were going to make a difference in the capitol building and that I was to help motivate and unite them. And, I believe that I was targeted and falsely arrested so I could not influence the legislators or the people during that and the following sessions.

Ultimately, I was arrested 3 more times for going back to the capitol building to attend legislative proceedings. Each time I was thrown in jail and sorely abused under the hand of the Ada County jailers.

To make matters worse, when I showed up to my first trespass trial, I was not allowed in the Ada County Courthouse because I would not wear a mask. After many attempts to get permission to go into the courthouse to attend my own trial, over a dozen Ada County Sheriff deputies exited the courthouse and arrested me for Failure to Appear (FTA) to my trial. On this occasion I spent 32 hours in an extremely cold holding cell in the Ada County Jail. The jailers refer to this cell as "the cold box". It was very miserable and cruel.

For the next year and a half, I spent much of my life litigating these cases. Never once had I damaged any property, committed any violence or harmed any person. Yet, I was viciously prosecuted at the hands of a team of Ada County Attorneys. In the middle of these trials, I was also sentenced to 10 days in jail and fined \$3,000 (the maximum sentence possible) for Contempt of Court (COC). Judge Annie McDevitt disagreed with me in using campaign service hours for public service time. So, with no opportunity to redo the hours and with no jury involved, she threw the book at me and I spent 10 more days in solitary confinement in the Ada County Jail. I am sure to this day she believes that I deserve such a harsh punishment, but even my critics vocalized their surprise at her extreme and unusual sentence.

In early March of 2022, I received a call from my friend's daughter Marissa Anderson. She was surrounded by police officers threatening to take her baby away. The Chavoya family are good friends of my family and we have spent much time together. They are one of the most loving, caring and politically active families that I know. The love and care they display to each other and to their friends is inspiring to all those who know them. Marissa's father Diego and I, during 2020, became two of the most public figures in Idaho speaking out against the governor's lockdown orders. Especially against the massive federal funds that were being distributed into Idaho institutions due to Governor Little keeping Idahoans under executive emergency powers for over 2 years.

So, after participating in much public scrutiny against the most powerful people in Idaho, police officers surrounded Diego's family and forcefully took his grandson under a false pretense of child neglect. Eventually, the accusations against the family were all proven to be absolutely false. Over time, the state had to give baby Cyrus back, drop the CPS case all together and dismiss the criminal charges against Marissa the mother and Miranda the aunt. However, I do not find it a coincidence that St. Luke's Hospital, the #1 PRIVATE beneficiary of the federal COVID funds coming through Governor Little and the Idaho Department of Health and Welfare (IDHW), the #1 PUBLIC beneficiary of the COVID funds, are the two institutions that carried out the assault against the Chavoya family, who happens to also be some of my best friends. They did so by falsely reporting baby Cyrus' condition and sending the police after them.

That night, being extremely concerned for baby Cyrus, the family and the entire injustice of the situation, I showed up at St. Luke's Hospital where baby Cyrus was taken, demanding that he be given back to his family. After many demands, Meridian Police Officers arrested me and took me to the Ada County Jail. I must say, even though the Meridian Police Officers were completely in the wrong and acted to enforce the will of people grossly abusing the law, they were also lied to by officials from the Idaho Department of Health and Welfare (CPS). They were told that baby Cyrus was Failing to Thrive (FTT) and that he must be taken to the hospital for immediate care.

However, the evidence tells an entirely different story. Baby Cyrus was not taken to the hospital for care, he was forcefully taken from his parents and brought to the hospital to be immediately given to foster parents. Yes, this is correct, waiting there patiently in Meridian St. Luke Hospital were baby Cyrus' new foster parent(s). Baby Cyrus was deemed "a healthy baby" by the medical staff who told the foster parent(s) to "leave promptly". However, because of the commotion that I and those with me were causing outside the hospital by peacefully demanding Cyrus be given back to his parents, the foster parents had lost their will to take the baby and therefore Cyrus was transferred to Boise St. Luke's Hospital instead.

Read these hospital reports from that night:

"Health and welfare identified a foster family but due to protesters surrounding the hospital regarding this case, it was felt that discharge with the family foster family from the emergency department was unsafe for all involved."

"The sending physician handed us the pt [i.e. patient] secured in his car seat. She indicated the patient was in stable condition and requested that we leave promptly. She stated, "just go! This is a healthy baby with no interventions"...no acute life threats noted."

The Idaho Department of Health and Welfare (CPS) mis-represented the truth about baby Cyrus, causing this entire situation. Baby Cyrus was and has always been cared for and loved to the extreme by his parents and family. His mother was breastfeeding and he had been thriving since birth. even though recently he was not reacting well to solid foods (not atypical for his age). CPS with the help of Meridian Police Officers took Cyrus away from his main source of nutrition (his mother), which was very concerning to many people, including myself. I felt I had the ability to bring attention to the matter and did so at the hospital by demanding that baby Cyrus be returned to his nursing mother.

Because of this incident, I and my family have once again suffered under the hands of Ada County Prosecutors for an additional year. The CPS case against baby Cyrus' parents was dropped, the criminal case against baby Cyrus' aunt was dismissed, the criminal case against baby Cyrus' mother was dropped, but the case against me continues to go on and is scheduled for trial this month. If convicted, I face heavy fines and up to 1 year in jail. The Ada County Chief Judge, in the middle of these proceedings, reassigned my case to Judge Annie McDevitt, the same judge who already threw the book at me once and sentenced me to 10 days in jail and a \$3000 fine. Normally, Contempt of Court (COC) is a fine of a few hundred dollars with no jail time. So, it doesn't take legal training to understand what she will try and do to me if I am convicted this time for helping baby Cyrus and his family.

It took about 6 days to get baby Cyrus back to his parents. The people at the Idaho Department of Health and Welfare (CPS) and Judge Laurie Fortier did not like the public scrutiny they were receiving and gave baby Cyrus back after about a week of hundreds of people protesting at St Luke's Hospital, the CPS office and the Judge's home. A few weeks later, St. Luke's Hospital sued Diego Rodriguez (Cyrus' grandfather) and myself for saying negative things about them. They retained Holland & Hart, LLP a law firm that also represents Governor Brad Little, Scott Bedke and the Idaho Department of Health & Welfare.

Each week, going on 5 months now, Diego and I have received mountains of court documents. Holland & Hart is sending documents to my business, home and associates, by personal service companies, Gem County Sheriff's deputies, US Postal Service, Fed-Ex and UPS. Some documents are too big to print so they send electronic files in packages to contain it all. Without exaggerating, I could have filled up a garbage dumpster to contain the amount of legal documents I have received from Holland & Hart. After speaking to an Idaho law firm (in hopes to defend myself) I was told that it would take at least 3 full time attorneys to respond to Holland & Hart's litigation on this case. Because this case may continue for several years, it is not impractical to calculate that it would take hundreds of thousands of dollars to properly defend against the onslaught of litigation paid for by donations given to St. Luke's Hospital.

I was informed by two very credible, independent sources (one a high-ranking Ada County Official and the other an attorney who works with St. Luke's hospital) that St. Luke's CEO gave Holland & Hart a blank check to financially destroy Diego and I for speaking out against them in the role they played in taking baby Cyrus. So, rather than taking action to ensure that the situation with baby Cyrus does not happen again, instead, St. Luke's CEO, Chris Roth, has authorized hundreds of thousands of dollars of donations given to St. Luke's Hospital to pay a law firm to financially destroy baby Cyrus' family and those who stood with them. I don't believe this is why people donate to St. Luke's Hospital. I believe those who donate to St. Luke's Hospital are under the impression that their donations are going to medically help children and other patients, not to fund a team of \$600 per hour bureaucrat attorneys sent to even a political score.

To date, St. Luke's team of attorneys have used the courts to put a lien on my home, forcing me to sell it. I have been forced to liquidate all my assets except a few and my family and I have no idea when any of this will end. St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. Mis-using the courts, they have put us under constant threat of losing everything we have worked for our entire lives. Never once have I knowingly stepped inside a St. Luke's medical facility in Idaho. Never have I or my family received any medical treatment from a St. Luke's provider. Lowe them nothing, yet they are trying to take everything. Anything I said about them (which was very minimal) I believe to be absolutely true, but they are using the courts to chill free speech and punish anyone who exposes them to the public. All of this, when they are the people who participated in stealing a baby from loving parents. Holland & Hart receiving open payments from St. Luke's Hospital to destroy lives by abusing the court is a prime example of Judicial Terrorism (JT).

In the last few years, I have been criminally charged many times for defending what the Idaho State and U.S. Constitutions were designed to protect. I have had so many court hearings that I have lost track of the number. I have endured multiple trials and spent weeks in solitary confinement in the Ada County Jail. I have been forced to sell my home and assets, been fined thousands of dollars and have not been able to rightfully provide for my family. Now, in less than a week, I will be forced to defend myself again in trial against criminal trespass charges, facing a team of government attorneys, for peacefully standing outside St. Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me, sentenced by Judge Annie McDevitt. I am certain if I am thrown in jail, by the time I get out, St. Luke's Executives and Holland & Hart Partners with help from a few Ada County Judges, will do their best to take everything they can from me and strip my family from anything we have left.

Never once have I damaged any property, committed any violence or harmed any person. I have remained peaceful and stood for peaceful remedies even when forceful actions in defense may have been justified. I have stood as a barrier in protecting the very people who are harming me from those who believe that sometimes a way to right a wrong is not always peaceful. Everything I have done has been peaceful, even when police officers have falsely arrested me, abused me, my family and my friends and caused me to bleed by violence. Even when jailers have cruelly forced me to suffer for days. Even when judges have taken my income, wealth and stripped me of my rights. Even when the courts have allowed judicial terrorists to use the force of law to harass and financially assault my family. I pray every day to my Father in Heaven for the resolve to remain peaceful, but feel I have the justification to call upon my friends and defend myself by any means, even though I have no intention at this point to do so.

My only desire is to be left alone! But I cannot stand by when the rights to life, liberty and property are being violated all around me. It is my belief that if a man or woman smites me or my family once I should bear it patiently and not revile against them. If they smite me or my family a second time, I should not revile against them. But if they smite me or my family a third time I should bear it patiently as a testimony against them, but warn them, in the name of Jesus Christ, that they come no more upon me or my family, and if they do so, God will deliver them into my hands. However, if they repent at any time, I should forgive them. I have full faith in these words and intend to live by them.

I therefore warn; Blake Higley, Scott Bedke, Whitney Welsh, Chris Roth, Annie McDevitt, Erik Stidham, Brad Little and Keith Reynolds, in the name of Jesus Christ, that you come no more upon me or my family. I pray that I will be even more patience than I have been and hope that you will repent of your violations against the people of Idaho and myself. There is not one person that I hate or wish harm to come upon. I only hope that you will see that all men and women are equal to you and that you have no right to deprive anyone of the gifts that God has given them, no matter what authority or power you think you possess.


Humbly,



Ammon Bundy

Attachments

 warning.pdf (73 KB)

 View 27 Comments



CTA - Ways to assist our neighbor, Ammon Bundy

UPDATES 2

Ammon needs all of us right now, at this very moment, to do what we can to stand with him as his trespassing trial begins. He has stood for our rights on numerous occasions, and this time he stood for an innocent baby that was unjustly taken from his breastfeeding mother.

Case Jan 19, 2023 Jan 23, 2023

807 38

Idaho 1N

Share (Alt)

There are several things we can do:

1. Show up to the Ada County Courthouse on Monday, if possible, about 8AM. Supporting Ammon in person is the most powerful.

2. Make sure you read and share his letter with EVERYONE YOU KNOW. This letter describes what is happening to him currently.

https://www.peoplesrights.org/news_view?id=f6984a7c-eafc-4082-a3b4-e99dfe129733

3. The link above provides an update. Update 1, at the very bottom, it tells what took place at his pre-trial hearing on Wednesday. Two Holland and Hart attorneys (representing the hospital in the civil lawsuit against Ammon) were present and advising/whispering to the prosecutor from behind. We are asking everyone to file a grievance with the Idaho State Bar against the two attorneys that were present, Erik Stidham and Christopher McCurdy. This seems unethical at the very least. This grievance form (in the link below) needs to be filled out, one form for each attorney, and returned to the Idaho State Bar in PDF format. You can mail it to Idaho State Bar, PO Box 895, Boise, ID 83701 or email the PDF form to Katherine Williams at kwilliams@isb.idaho.gov.

<https://isb.idaho.gov/wp-content/uploads/Grievance-Packet.pdf>

4. Forward the below link detailing the 8 laws that were broken during the Baby Cyrus incident to all your representatives. They need to know how CPS and local police disregarded the law that night.

<https://www.freedomman.org/cyrus/laws-that-were-broken/>

5. Additionally, you can write to Chris Roth, CEO of St. Luke's Hospital, however, the only email we could find to the foundation is: foundation@slhs.org

6. Call Judge Annie McDevitt at 208-287-7483, give your personal testimony to Ammon's character. You may get a message machine or someone who is screening her calls.

7. You can also write or call (with personal testimony to Ammon's character) Whitney Welsh and the Ada County Prosecutors at Ada County Courthouse 200 W Front Street, Boise, ID 83702. Phone: 208 287-7700. Email: adacountyprosecutor@adacounty.id.gov.

Thank you!

View Comments

Update #2

UPDATE 2

 Jan 23, 2023  Jan 23, 2023

 [Permalink \(Alt\)](#)

<https://idahodispatch.com/ammon-bundy-proposes-plea-deal-judge-rejects-and-orders-trial-then-new-plea-deal-reached/>

 View Comments

Update from Ammon - 1/21/2023

UPDATE 1

 Jan 21, 2023  Jan 21, 2023

 [Permalink \(Alt\)](#)

UPDATE: I MADE A PEACE OFFERING, LETS SEE IF THEY WILL TAKE IT.

January 21, 2023

Yesterday while I was out, two people came to the front door of my home and served my family with more legal papers from St. Luke's. The amount of mail and people serving legal papers (whether it be private servers or a sheriff deputy) coming to our home and mailbox is becoming extremely harassing. We are receiving typically at least a ream-size amount of papers weekly, many times much more. St. Luke's CEO, Chris Roth has authorized undefined amounts of funds to the Holland & Hart law firm to overwhelm the court with legal filings, motions and injunctions, seeking to ruin what finances and reputation I have left, (Diego too). There is simply no way I can respond to all the court filing or legal action from St. Luke's. I was told by an Idaho law firm that it would take at least 3 full time attorneys to respond to Holland & Hart's court filings on this case. I am certain St Luke's must have already accrued hundreds of thousands in attorney fees to pay for such a legal assault. Holland & Hart attorneys are not cheap. If I was to try and respond to every legal document sent to me it would have already cost myself nearly a hundred thousand dollars in legal fees, if not more. On top of that, I would be required to spend my entire life organizing a legal defense against St. Luke's.

The action from Holland & Hart, led by Eric Stidham is an extreme abuse of the Idaho courts and I am surprised that Judge Lynn Norton has allowed it to go on for this long. The Holland & Hart law firm has a lot of pull and I am certain Judge Norton is intimidated by them and the power they wield in Idaho. After all, Holland & Hart also represents Governor Little, former Speaker of the House Scott Bedke (now Lieutenant Governor) and the most powerful lobbyist group in Idaho, IACI. I don't envy the position she is in. Nonetheless, the courts should not allow themselves to be manipulated into becoming a tool for powerful people with endless funds trying to crush political enemies. But, when one looks at the history of courts, this type of abuse is a common occurrence. Just read the Bible or a few history books.

Without looking closely into the TWO St Luke's cases against me (1-CRIMINAL, 1-CIVIL), it may seem a bit confusing in what St. Luke's executives are trying to do to me. With the CRIMINAL case, St. Luke's is claiming to be a victim of mine for when I went to their Meridian hospital demanding that they give baby Cyrus back to his parents (see details above). The CIVIL case is a lawsuit against Diego (baby Cyrus' grandfather) and I for speaking out against the actions of St. Luke's employees, CPS staff and Meridian police officers in taking baby Cyrus (read details above). In the CRIMINAL case, I have had no choice but to participate and show up to court or Judge McDevitt will send officers to kick in my door, terrorize my family and haul me off to jail; eventually pronouncing a sentence upon me. The CIVIL case is different. I must bear the cost of the legal defense (if I choose to have one). With the amount of legal preceding coming from Holland & Hart in this case, there is no way I can bear the expense (time or money) to defend myself, nor do I want to spend the next 5 years full-time doing so (I have a family that I must provide for and tend to).

If Judge Norton does not see what is happening here and chooses not to stop it, eventually, she will grant St. Luke's executives "punitive damages" and expenses to be paid for the massive amount of legal fees that Holland & Hart attorneys have and will accumulate, and will order the Gem County Sheriff to take everything I own. Without going into hundreds of thousands of dollars in debt for legal fees, and spending the next several years fighting full-time, there is no way to legally fight against them. This is how the rich and powerful punish those who expose and stand up to them. Remember they took a baby from loving, caring parents without true cause and I simply stood for the family exposing the truth (see above for details).

So, with all of this going on, yesterday I made a peace offering to St. Luke's executives and settled the CRIMINAL case outside of court. Agreeing to a fine and a suspended sentence of 90 days jail. I have never done this before and it is certainly not my style. I prayed and pondered about this move for many days. I did not purger myself and kept this

agreement within the moral boundaries that all of us must live by as children of God. This was not an act done in fear or desperation. This agreement will become official on Monday, so I will not be having a trial anymore. There is no need for people to come to the court-house to support me in trial any longer. Thank you so very much! Now be aware, the judge could reject the agreement and force me to trial, but that is extremely rare and would make her (Judge Annie McDevitt) look even more like the prejudiced judge she is.

My desire, in all I have done, was never to overturn the courts and make the judges start administering justice as the law prescribes. I never wanted to spend my life fighting in the courts. In-fact, after coming home from being in federal prison for two years - never convicted of even one charge - and going through two major federal trials, my desire was to never enter a courtroom again. I only wanted then, and still today, to be left alone. So, making this agreement in the CRIMINAL case is an effort to extend an olive branch to St. Luke's executives. To show that I simply want to be left alone. That I didn't just wake up in the middle of the night, drive an hour to one of their hospitals and cause a scene, because I hate them and wanted to cause them trouble. That I did not rally people to peacefully demonstrate outside one of their hospitals, several days in a row, because I despised them or wanted revenge for something. Making this peace offering I pray will serve as another testimony that I have tried from the beginning to only stand for my fellow man and do what is right before God. I pray that this olive branch will be accepted and that all of us can go about our way in peace.



Ammon Bundy

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CALL TO ACTION - 5 Minutes STAND UP FOR AMMON

Kangaroo Courts is Vicious and ruthless. Read Details below. Click Read

Case Jan 21, 2023

86 6 2

Idaho 11

Share (Alt)

Please spend a little bit of your time to help my friend Ammon Bundy. The establishment is out for his blood and he could really use our help. If you are Here as a PR Member, NOW is the time to take ACTION for the Man who showed us the way.

There are several things we can do:

1. Show up to the Ada County Courthouse on Monday, January 23rd, if possible, about 8AM. Even if you will be late, Please show up as soon possible. Supporting Ammon in person is the most powerful thing we CAN DO! Fill the Courtroom and Halls.
2. Make sure you read and share his letter with EVERYONE YOU KNOW. This letter describes what is happening to him currently.

Here's a link you can post instead. <https://www.defendingutah.org/post/2023/01/18/ammon-bundy-warning-letter-to-gadiantons-of-idaho/>

3. The link above provides an update. Update 1, at the very bottom, it tells what took place at his pre-trial hearing on Wednesday. Two Holland and Hart attorneys (representing the hospital in the civil lawsuit against Ammon) were present and advising/whispering to the prosecutor from behind. We are asking everyone to file a grievance with the Idaho State Bar against the two attorneys that were present, Erik Stidham and Christopher McCurdy. This seems unethical at the very least. This grievance form (in the link below) needs to be filled out, one form for each attorney, and returned to the Idaho State Bar in PDF format.

You can mail it to Idaho State Bar, PO Box 895, Boise, ID 83701 or email the PDF form to Katherine Williams at kwilliams@isb.idaho.gov.

<https://isb.idaho.gov/wp-content/uploads/Grievance-Packet.pdf>

4. Forward the below link detailing the 8 laws that were broken during the Baby Cyrus incident to all your representatives. They need to know how CPS and local police disregarded the law that night.

<https://www.freedomman.org/cyrus/laws-that-were-broken/>

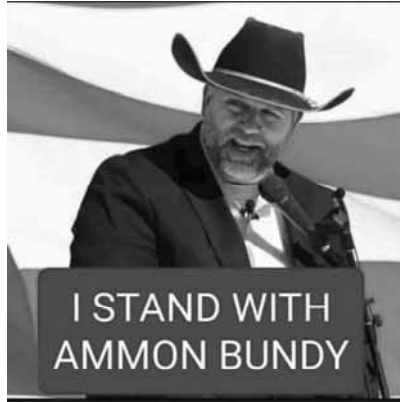
5. Additionally, you can write to Chris Roth, CEO of St. Luke's Hospital, however, the only email we could find to the foundation is: foundation@slhs.org

6. Call Judge Annie McDevitt at 208-287-7483, give your personal testimony to Ammon's character. You may get a message machine or someone who is screening her calls.

7. You can also write or call (with personal testimony to Ammon's character) Whitney Welsh and the Ada County Prosecutors at Ada County Courthouse 200 W Front Street, Boise, ID 83702. Phone: 208 287-7700. Email: adacountyprosecutor@adacounty.id.gov

8. Change your MEDIA PLATFORMS Profile Photo to this one below. Share this CTA Directives everywhere and Ammons Letter. IT'S IMPERATIVE

Thank you! A11



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UPDATES 3

Ammon Bundy Is Being Victimized by The State of Idaho With Judicial Terrorism

RIGHT NOW our friend, Ammon Bundy, is being prosecuted by the State of Idaho (again). The jury trial begins THIS MONDAY MORNING, JANUARY 23RD.

Info Jan 22, 2023 Jan 24, 2023

251 15

Alabama 1, Alabama 2, Alabama 3, Alabama 4, Alabama 5, Alabama 6, Alabama 7, Alabama 8, Alabama 9, Alabama 10

Share (Alt)

This Story concern all Freedom Loving Americans Including fellow Alabamians:

- Has your love of liberty ceased, or do you keep that fire kindled inside you?*
- Did you know there are conspiring efforts between some in our own Idaho government and pseudo-private businesses to strip the rights of a fellow Idahoan?*
- Do you realize if they succeed at taking away his rights, then they can also take away yours?*
- Do you still support him, even after the race has ended and the dust settled?*
- He has stood to defend your rights many times.*
- Will you now stand for his?*



RIGHT NOW our friend, Ammon Bundy, is being prosecuted by the State of Idaho (again). The jury trial begins **THIS MONDAY MORNING, JANUARY 23RD**. If humanly possible, Ammon needs us to be there during the trial **IN-PERSON**. He needs to see your support, and those that seek to ruin him must *also* see *your* support for him. A physical, interested presence by the public during the trial is critical. It may last for several days, so please come prepared to stay in the area, if possible. This is no joke! **The Ada County Courthouse** is located at 200 W Front St, Boise, ID 83702, and parking is easy on the southeast side of the building.

Why is this happening?! Because he dared, *again*, to oppose actions that directly violating the rights of his neighbor. This time, he simply voiced his opposition to a baby being forcefully taken from the arms of its young, loving mother. As a result, the petty tyrants involved decided they didn't like like their evil deeds being exposed, so they arrested him for "trespassing". Ammon didn't hurt anyone, nor did he damage the property of another. He peacefully, yet *publicly*, expressed his distaste for what had just happened. If he is convicted, he faces up to a \$10,000 fine and losing ANOTHER YEAR of his life in jail; away from his own young family. Does this sound like the "justice system" you want in Idaho? Is this a wise use of your sacred tax-payer dollars; spent prosecuting *innocent* people, having nothing but goodwill for their neighbor?

If you are unaware of the details surrounding and following the heinous event that resulted in Ammon's arrest, we invite you to take a moment and become more familiar with what "the system" of government in Idaho will do to innocent people when it has the opportunity...

Baby Cyrus Was Kidnapped by CPS and Meridian Police!

The Entire Baby Cyrus Kidnapping Story

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

Ultimately, due to the actions of Ammon and other good neighbors, the CPS case fell apart, Baby Cyrus was returned to the arms of his loving parents, and the charges against ALL OTHERS involved were dismissed. Except Ammon. Ammon's charge of "trespassing" was NOT dropped, and he is now facing the loss of his freedom and (another) extreme hardship on his young family. Why?! Could this be another perfect example of *political retaliation*, since he ran against and actively worked to expose one of the most corrupt political tyrants in Idaho history: Governor Brad Little? Could it be because he, and others, recently made ground in bringing to light a deep and entrenched system of state-sponsored child-trafficking in Idaho? Could it be because the judge in this trial is one that has *already* shown her extreme bias against Ammon in a previous trial? We may never know, but Ammon shares his own perspective in the following open letter of warning he recently published; giving a brief overview of events and valuable insights into the reasons behind his actions that night...

Come no more upon me, a warning letter from Ammon

Bundy:

<https://www.keepidahoidaho.org/go/65e8796e-f847-4d53-908e-4568f447323e>

My friend, this is what happens when WE THE PEOPLE *OF IDAHO and the rest of the Union*, as a whole, do not mind well our own liberty. We stand to eventually lose it, completely.

"Let not any one pacify his conscience by the delusion that he can do no harm if he takes no part, and forms no opinion. Bad men need nothing more to compass their ends, than that good men should look on and do nothing. He is not a good man who, without a protest, allows wrong to be committed in his name, and with the means which he helps to supply, because he will not trouble himself to use his mind on the subject."

- John Stuart Mill, 1867

Or, in more common words, the old adage so testifies, "The only thing necessary for the triumph of evil is for good men to do nothing."

So, will you now do... *nothing*?

Things You Can Do

1. Pray that our Father in Heaven will soften the hearts of those that are persecuting Ammon; that they will repent of their actions against him, and other innocent people, and drop the case entirely. If you don't pray, this would be a great reason to begin - petitioning the creator of heaven and earth for His protection over the innocent.
2. Show up! Plan to attend the upcoming trial in-person. There is strength in numbers.
3. Call the Idaho Attorney General, Raul Labrador, and request his office move to dismiss the erroneous charge, like he recently did in the case against Sara Brady. Several Idaho Statutes (laws) were clearly violated during the Baby Cyrus ordeal. But, instead of bringing the perpetrators of the law to justice, time, energy and resources are being wasted prosecuting an innocent man that acted in good faith to prevent injury to a child.
4. Call and/or email Judge Annie McDevitt, urging her to dismiss the case, or at least recuse herself from the trial - due to publicly obvious bias during a previous sentencing - so a new judge can be assigned: 208-287-7483 (may be answered by a staff member screening calls), amcdevitt@adacounty.id.gov
5. Call and/or email Ada County Deputy Prosecuting Attorney, Whitney Welsh, urging her to drop the charges, and give a personal testimony as to Ammon's character: 208 287-7700 (may be answered by a staff member screening calls), adacountyprosecutor@adacounty.id.gov
6. Share this email/information quickly. Little time is left before the trial begins, and Ammon's freedom is in jeopardy.
7. Remember another fellow Idahoan, Robert Jones. He is now serving 6 MONTHS in Ada County jail for protesting mask mandates. His crime? "Disturbing the Peace"... by banging on a bucket for 10 minutes on a public sidewalk in the middle of the day. We simply cannot allow this tyrannical trend to continue.

 View Comments

 Jan 24, 2023  Jan 24, 2023

 [Permalink \(Alt\)](#)

January 24, 2023

Yesterday I was scheduled for trial for the criminal case. In this case St. Luke's hospital claimed to be a victim of mine and the state was prosecuting me with the potential of jail up to 1 year and up to a \$10,000 fine. This was for going to St. Luke's Meridian hospital and demanding that they give baby Cyrus back to his parents. I was arrested for trespassing on the St. Lukes property. Last Friday the state, St. Luke's and I had come to a settlement agreement and Monday morning's court hearing was supposed to be just procedural. However, in a very rare turn of event, Judge Annie McDevitt, after hearing the details of the agreement, left the room for around 25 minutes and when she came back immediately ruled that she was not going to accept the agreement. She claimed that the Idaho Victims Act was the reason. She stated that she believed St. Luke's (as the victim) was not really okay with the agreement and that she had an obligation to try and satisfy St. Luke's hospital with greater punishment. St. Luke's had a lawyer from Holland & Hart who then began to manipulate the entire proceeding. It was amazing to witness. St Luke's hospital is the largest "private" employer in the state of Idaho and Holland & Hart is one of the largest law firms in the western United States. They are both tied closely to Governor Little and Scott Bedke. I would have never believed the power they hold over Idaho courts unless I had witnessed what I did yesterday in that courtroom.

Chris Topmiller, the state prosecutor, seemed upset as well. St. Luke's executives went back on the agreement because either they communicated with the judge while she was out (which is illegal by the way) or they saw that the judges had extreme contempt towards me and wanted to grasp the opportunity to go for blood. Mr. Topmiller said to me, *"The judge was going to do whatever St. Luke's wanted."* Ultimately, St. Luke's and Holland & Hart wanted me in jail, *I must go to jail.*

To make a long story short, after going back and forth for about an hour and a half, Chris Topmiller and St. Luke's lawyer came to an agreement that included imposed jail time. Initially, I rejected those offers and it finally came down to around 80 days suspended jail time and 5 days imposed jail time. With that as the proposed agreement, I asked if St. Lukes was going to stick with this agreement or go back on it again. I was told that they were in agreement. I then informed Chris Topmiller that I had several days of credit for jail time when I was thrown in jail prior and have a right to use those days of credit. This would keep me from actually going to jail. However, when the St. Luke's people heard about my jail credit, they threw a fit and tried to go back on the agreement again, insisting that I go to jail no matter what. The judge wanted me to agree to at least some imposed jail time, but I insisted that my credit for jail were legal credits and that I had suffered these days in jail, that I had a right to use them. I also made it clear that if they would not accept the credits and tried to impose jail time, then I was ready to go to trial. Chris Topmiller made the statement that settling this matter was negotiations and everyone has to give.

Judge McDevitt finally decided that the days in jail were not worth going to trial and ruled that the agreement with the credit for time served was final. At the objections of the St. Lukes she ended the proceedings. This judge was put in a position of exposure, if she was to continue to give anymore to St. Luke's then her bias would have become more evident. She could see that St. Luke's executives were never going to be satisfied and would continue to go back on their agreements until I was in jail.

This is what happens when three wolves fight about how they are going to eat a lamb.

I must say that I do believe I would have prevailed in trial. My defense (see below) was very strong and although it is always a challenge to get the truth in front of the jury, I believe (by faith) that I would have succeeded. However, for months I have been asking the Lord to let me know His will in this matter. Ultimately, I came to understand that it did not matter if I went to trial or not, I was not going to prove anything and that I should use this opportunity to extend an olive branch to my enemies. So that is what I did. I do not believe St. Luke's and Holland & Hart accepted my token of peace because they continue to seek for blood. However, I extended it to them, as I believe God requires.

When the court proceedings were over I had a sweet woman insist that God had told her to pay all the fines imposed upon me, nearly \$1200. She told me not to reject her offer because it was from God. Just seconds after that a tall man came up to me and asked me if he could pay all of the fines imposed upon me. Then after going down to the main floor of the courtroom I had another woman offer. Leaving the courthouse I called my wife to inform her of what had happened and to let her know that I was coming home one more time. She informed me that baby Cyrus' parents had just Venmoed us \$1200 to pay the imposed fines. This love brought tears to both of our eyes. I know that the way we get through hard times is by the goodness of people around us. I am surrounded by the best people in the world. THANK YOU!

As long as I do not "commit any new crimes" the CRIMINAL case against me is over. I pray that St. Luke's will stop this attack on my family and I and end the CIVIL case against me as well (I am not holding my breath). Baby Cyrus back with his parents was worth it all. That is the ultimate win no matter what happens. I am certain that the Lord is pleased with everyone who acted to make that possible. My only desire to be left alone and live my life in peace.



Ammon Bundy

Statement on defense if I was to go to trial:

In one of the body cam videos, Eron Sanchez, St. Luke's administrator, says "go to the designated area off of St. Luke's property". I did not hear that when he said it at the time, no one did that I know of. All those I know who have gone through the videos did not pick up on this either. However, when I began to transcribe that video, I caught it. This was just a couple weeks ago. This did not have a huge impact on my defense because it was never about trespassing anyway. My defense was about baby Cyrus being taken from his nursing and caring mother. The reason we went to St. Luke's hospital in the first place.

My defense in trial was going to be a necessity defense. The state took baby Cyrus from his nursing mother. CPS, St. Luke's nor the foster parents understood what was going on with baby Cyrus. St. Luke's doctors had misdiagnosed baby Cyrus multiple times. Ultimately, another doctor diagnosed baby Cyrus later with Clinic Vomiting Syndrome (CVS). If baby Cyrus would have been taken to foster parents that night when they did not understand his eating schedule, his vomiting syndrome, his sleeping schedule nor what to do to keep him from dehydrating when he vomits profusely, there was a significant chance he would have lost his life. The evidence shows facts of this when Cyrus was taken to Boise St. Luke's rather than given to foster parents because of our actions that night. After St. Luke's nurses fed him with a bottle he threw the formula up. This happened multiple times and when the parents got baby Cyrus back he had a feeding tube down his throat and bruises all over his arms and legs where St. Luke's doctors injected him multiple times with IV needles. I believe it was not until his mother was allowed to give him breast milk and love him that baby Cyrus began to recover.

Ultimately, I and those with me that night stopped the process of baby Cyrus going to foster parents and very likely saved his life or at least from serious medical complications.

If a could prove in trial these elements and if the jury would be honest, I would have prevailed.

- 1) There was a specific threat of immediate harm to baby Cyrus,
- 2) I did not bring about the circumstances which created the threat of immediate harm,
- 3) I could not have prevented the threatened harm by any less offense, alternative,
- 4) The harm caused by staying in the St. Luke's ambulance bay was less than the threatened harm to baby Cyrus.

 [View Comments](#)

A Letter from Ammon

UPDATE 2

 Jan 23, 2023  Jan 23, 2023

 [Permalink \(Alt\)](#)

From: Ammon Bundy

To: Blake Higley; Scott Bedke; Whitney Welsh; Chris Roth; Anne McDevitt; Erik Stidham; Brad Little; Keith Reynolds;

RE: Warning

I Ammon Bundy respectfully come seeking relief that my family and I may live in peace and not be harassed at your hands anymore.

As much as it pains me to do so, it is my duty to plead my case to you in why I have acted the way I have over the past few years. I pray that you will understand my intentions and see how my actions have been based in love for God and my fellow man, including yourself.

In February of 2020 I made a vow that I would not live or allow my family and friends to be compelled to live under the delusional control of tyrants pushing lockdown mandates using health orders as the excuse. I made this vow immediately after becoming aware of what officials in the state of California were doing to the people in that area. I had hoped that the same type of action would not come to Idaho, but my hopes were in vain, as in mid-March of 2020, Brad Little, Governor of Idaho, issued a statewide stay-home-order, much like California's Governor Gavin Newsom did earlier that month.

Knowing very well that no state or other official has been granted the authority to order my friends, family or I to remain in our homes until we have their permission to leave. Knowing that no man or group of people have the right to order other men or women to stop trading with each other in an effort to provide for their families. Knowing that no man or group of people have the right to order other men or women not to visit and care for each other. Knowing that state officials have only been granted authority enumerated in the state and United States Constitutions. Knowing above all things that the right to travel, the right to visit with and care for each other, the right to leave our homes at will, the right to trade and provide for our families are endowed by God the Almighty Creator to each of His children residing upon this earth, and that no government official has the authority to alienate these rights from His children unless in defense of their own rights.

Knowing these things, I began to act openly in peaceful defiance of the immoral and unconstitutional usurpations coming from government officials within the state of Idaho. Holding regular public meetings, an Easter service, peacefully protesting at a Meridian police officer's home for arresting a mother who took her children to the park and organizing people to peacefully stand for the rights that God had given them. Never once did I damage any property, commit any violence or harm any person. It is not in my nature to do so.

However, these simple peaceful acts of non-compliance caused heads of several government agencies to communicate with each other about what should be done with Ammon Bundy. In one email chain between the head of the Idaho State Police, Colonel Kendrick Wills, Meridian Police Chief, Meridian Mayor, Robert Simison, the FBI JTTF (Joint Terrorist Task Force), Ada County Sheriff, Steve Bartlett, and several other heads of government agencies and offices in Idaho, all discussed to potentially raid the Easter service I had planned and mass arrest those attending. Imagine, in the United State of America, in the State of Idaho, heads of law enforcement and other officials plotting to raid a Christian worship service on Easter. And doing so because those assembling to worship God did not have permission from government officials to do so. Ultimately, these officials decided not to move forward with the raid and mass arrests because the Easter service was held in Gem County on private property. It is my belief that the Gem County Sheriff and Emmett Mayor did not support the action so they did not move forward with the raid.

In August 2020, Governor Little called for a special legislative session to gain legal immunity for the action of state officials during the lock-down orders. When the session began, hundreds of people came to the Idaho capitol building to attend. However, Scott Bedke, Speaker of the House, ordered the House gallery doors to be locked, guarded by Idaho State Police Troopers; stopping hundreds of people from legally attending the session. This caused many people to become very upset and eventually we pushed our way through the locked doors. I must mention that Idaho State law prohibits the doors to the House or Senate galleries from being locked at any-time during a regular or special session. Regardless, this law did not seem to matter to Speaker Scott Bedke or to the Idaho State Police Troopers. In-fact, instead of apologizing to the people for illegally blocking the doors, the next day, nearly half of the all the ISP Troopers in Idaho were ordered to report for duty at the capitol building. That afternoon an incident with the independent media was fabricated and I was arrested. My crime was sitting quietly and non disruptive in a

public room in the Idaho capitol building (the Lincoln auditorium), during open hours, where no proceedings were taking place. The Lincoln auditorium doors were always open to the public until 7 PM each day. However, that day, at 5 PM, over 60 police officers entered the room and area and ordered me to leave. When I did not leave immediately, I was arrested and trespassed from the capitol building for a year. During my trial, over a year later, multiple police officers testified that I was *"not being disruptive and had broken no rules"*(please watch this video).

I do admit, at this point I became somewhat irrational. For I believed that I had a right to go into the Idaho capitol building and participate in the legislative process. I believed that the capitol building belonged to the people and not the government. I believed that somehow the people were going to make a difference in the capitol building and that I was to help motivate and unite them. And, I believe that I was targeted and falsely arrested so I could not influence the legislators or the people during that and the following sessions. Ultimately, I was arrested 3 more times for going back to the capitol building to attend legislative proceedings. Each time I was thrown in jail and sorely abused under the hand of the Ada County jailers.

To make matters worse, when I showed up to my first trespass trial, I was not allowed in the Ada County Courthouse because I would not wear a mask. After many attempts to get permission to go into the courthouse to attend my own trial, over a dozen Ada County Sheriff deputies exited the courthouse and arrested me for Failure to Appear (FTA) to my trial. On this occasion I spent 32 hours in an extremely cold holding cell in the Ada County Jail. The jailers refer to this cell as *"the cold box"*. It was very miserable and cruel.

For the next year and a half, I spent much of my life litigating these cases. Never once had I damaged any property, committed any violence or harmed any person. Yet, I was viciously prosecuted at the hands of a team of Ada County Attorneys. In the middle of these trials, I was also sentenced to 10 days in jail and fined \$3,000 (the maximum sentence possible) for Contempt of Court (COC). Judge Annie McDevitt disagreed with me in using campaign service hours for public service time. So, with no opportunity to redo the hours and with no jury involved, she threw the book at me and I spent 10 more days in solitary confinement in the Ada County Jail. I am sure to this day she believes that I deserve such a harsh punishment, but even my critics vocalized their surprise at her extreme and unusual sentence.

In early March of 2022, I received a call from my friend's daughter Marissa Anderson. She was surrounded by police officers threatening to take her baby away. The Chavoya family are good friends of my family and we have spent much time together. They are one of the most loving, caring and politically active families that I know. The love and care they display to each other and to their friends is inspiring to all those who know them. Marissa's father Diego and I, during 2020, became two of the most public figures in Idaho speaking out against the governor's lockdown orders. Especially against the massive federal funds that were being distributed into Idaho institutions due to Governor Little keeping Idahoans under executive emergency powers for over 2 years.

So, after participating in much public scrutiny against the most powerful people in Idaho, police officers surrounded Diego's family and forcefully took his grandson under a false pretense of child neglect. Eventually, the accusations against the family were all proven to be absolutely false. Over time, the state had to give baby Cyrus back, drop the CPS case all together and dismiss the criminal charges against Marissa the mother and Miranda the aunt. However, I do not find it a coincidence that St. Luke's Hospital, the #1 PRIVATE beneficiary of the federal COVID funds coming through Governor Little and the Idaho Department of Health and Welfare (IDHW), the #1 PUBLIC beneficiary of the COVID funds, are the two institutions that carried out the assault against the Chavoya family, who happens to also be some of my best friends. They did so by falsely reporting baby Cyrus' condition and sending the police after them.

That night, being extremely concerned for baby Cyrus, the family and the entire injustice of the situation, I showed up at St. Luke's Hospital where baby Cyrus was taken, demanding that he be given back to his family. After many demands, Meridian Police Officers arrested me and took me to the Ada County Jail. I must say, even though the Meridian Police Officers were completely in the wrong and acted to enforce the will of people grossly abusing the law, they were also lied to by officials from the Idaho Department of Health and Welfare (CPS). They were told that baby Cyrus was Failing to Thrive (FTT) and that he must be taken to the hospital for immediate care.

However, the evidence tells an entirely different story. Baby Cyrus was not taken to the hospital for care, he was forcefully taken from his parents and brought to the hospital to be immediately given to foster parents. Yes, this is correct, waiting there patiently in Meridian St. Luke Hospital were baby Cyrus' new foster parent(s). Baby Cyrus was deemed "a healthy baby" by the medical staff who told the foster parent(s) to "leave promptly". However, because of the commotion that I and those with me were causing outside the hospital by peacefully demanding Cyrus be given back to his parents, the foster parents had lost their will to take the baby and therefore Cyrus was transferred to Boise St. Luke's Hospital instead.

Read these hospital reports from that night:

"Health and welfare identified a foster family but due to protesters surrounding the hospital regarding this case, it was felt that discharge with the family foster family from the emergency department was unsafe for all involved."

"The sending physician handed us the pt [i.e. patient] secured in his car seat. She indicated the patient was in stable condition and requested that we leave promptly. She stated, "just go! This is a healthy baby with no interventions"...no acute life threats noted."

The Idaho Department of Health and Welfare (CPS) misrepresented the truth about baby Cyrus, causing this entire situation. Baby Cyrus was and has always been cared for and loved to the extreme by his parents and family. His mother was breastfeeding and he had been thriving since birth, even though recently he was not reacting well to solid foods (not atypical for his age). CPS with the help of Meridian Police Officers took Cyrus away from his main source of nutrition (his mother), which was very concerning to many people, including myself. I felt I had the ability to bring attention to the matter and did so at the hospital by demanding that baby Cyrus be returned to his nursing mother.

Because of this incident, I and my family have once again suffered under the hands of Ada County Prosecutors for an additional year. The CPS case against baby Cyrus' parents was dropped, the criminal case against baby Cyrus' aunt was dismissed, the criminal case against baby Cyrus' mother was dropped, but the case against me continues to go on and is scheduled for trial this month. If convicted, I face heavy fines and up to 1 year in jail. The Ada County Chief Judge, in the middle of these proceedings, reassigned my case to Judge Annie McDevitt, the same judge who already threw the book at me once and sentenced me to 10 days in jail and a \$3000 fine. Normally, Contempt of Court (COC) is a fine of a few hundred dollars with no jail time. So, it doesn't take legal training to understand what she will try and do to me if I am convicted this time for helping baby Cyrus and his family.

It took about 6 days to get baby Cyrus back to his parents. The people at the Idaho Department of Health and Welfare (CPS) and Judge Laurie Fortier did not like the public scrutiny they were receiving and gave baby Cyrus back after about a week of hundreds of people protesting at St Luke's Hospital, the CPS office and the Judge's home. A few

weeks later, St. Luke's Hospital sued Diego Rodriguez (Cyrus' grandfather) and myself for saying negative things about them. They retained Holland & Hart, LLP a law firm that also represents Governor Brad Little, Scott Bedke and the Idaho Department of Health & Welfare.

Each week, going on 5 months now, Diego and I have received mountains of court documents. Holland & Hart is sending documents to my business, home and associates, by personal service companies, Gem County Sheriff's deputies, US Postal Service, Fed-Ex and UPS. Some documents are too big to print so they send electronic files in packages to contain it all. Without exaggerating, I could have filled up a garbage dumpster to contain the amount of legal documents I have received from Holland & Hart. After speaking to an Idaho law firm (in hopes to defend myself) I was told that it would take at least 3 full time attorneys to respond to Holland & Hart's litigation on this case. Because this case may continue for several years, it is not impractical to calculate that it would take hundreds of thousands of dollars to properly defend against the onslaught of litigation paid for by donations given to St. Luke's Hospital.

I was informed by two very creditable, independent sources (one a high-ranking Ada County Official and the other an attorney who works with St. Luke's hospital) that St. Luke's CEO gave Holland & Hart a blank check to financially destroy Diego and I for speaking out against them in the role they played in taking baby Cyrus. So, rather than taking action to ensure that the situation with baby Cyrus does not happen again, instead, St Luke's CEO, Chris Roth, has authorized hundreds of thousands of dollars of donations given to St. Luke's Hospital to pay a law firm to financially destroy baby Cyrus' family and those who stood with them. I don't believe this is why people donate to St. Luke's Hospital. I believe those who donate to St. Luke's Hospital are under the impression that their donations are going to medically help children and other patients, not to fund a team of \$600 per hour bureaucrat attorneys sent to even a political score.

To date, St Luke's team of attorneys have used the courts to put a lien on my home, forcing me to sell it. I have been forced to liquidate all my assets except a few and my family and I have no idea when any of this will end. St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. Mis-using the courts, they have put us under constant threat of losing everything we have worked for our entire lives. Never once have I knowingly stepped inside a St. Luke's medical facility in Idaho. Never have I or my family received any medical treatment from a St. Luke's provider. Lowe them nothing, yet they are trying to take everything. Anything I said about them (which was very minimal) I believe to be absolutely true, but they are using the courts to chill free speech and punish anyone who exposes them to the public. All of this, when they are the people who participated in stealing a baby from loving parents. Holland & Hart receiving open payments from St. Luke's Hospital to destroy lives by abusing the court is a prime example of Judicial Terrorism (JT).

In the last few years, I have been criminally charged many times for defending what the Idaho State and U.S. Constitutions were designed to protect. I have had so many court hearings that I have lost track of the number. I have endured multiple trials and spent weeks in solitary confinement in the Ada County Jail. I have been forced to sell my home and assets, been fined thousands of dollars and have not been able to rightfully provide for my family. Now, in less than a week, I will be forced to defend myself again in trial against criminal trespass charges, facing a team of government attorneys, for peacefully standing outside St. Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me, sentenced by Judge Annie McDevitt. I am certain if I am thrown in jail, by

the time I get out, St. Luke's Executives and Holland & Hart Partners with help from a few Ada County Judges, will do their best to take everything they can from me and strip my family from anything we have left.

Never once have I damaged any property, committed any violence or harmed any person. I have remained peaceful and stood for peaceful remedies even when forceful actions in defense may have been justified. I have stood as a barrier in protecting the very people who are harming me from those who believe that sometimes a way to right a wrong is not always peaceful. Everything I have done has been peaceful, even when police officers have falsely arrested me, abused me, my family and my friends and caused me to bleed by violence. Even when jailers have cruelly forced me to suffer for days. Even when judges have taken my income, wealth and stripped me of my rights. Even when the courts have allowed judicial terrorists to use the force of law to harass and financially assault my family. I pray every day to my Father in Heaven for the resolve to remain peaceful, but feel I have the justification to call upon my friends and defend myself by any means, even though I have no intention at this point to do so.

My only desire is to be left alone! But I cannot stand by when the rights to life, liberty and property are being violated all around me. It is my belief that if a man or woman smites me or my family once I should bear it patiently and not revile against them. If they smite me or my family a second time, I should not revile against them. But if they smite me or my family a third time I should bear it patiently as a testimony against them, but warn them, in the name of Jesus Christ, that they come no more upon me or my family, and if they do so, God will deliver them into my hands. However, if they repent at any time, I should forgive them. I have full faith in these words and intend to live by them.

I therefore warn; Blake Higley, Scott Bedke, Whitney Welsh, Chris Roth, Annie McDevitt, Erik Stidham, Brad Little and Keith Reynolds, in the name of Jesus Christ, that you come no more upon me or my family. I pray that I will be even more patience than I have been and hope that you will repent of your violations against the people of Idaho and myself. There is not one person that I hate or wish harm to come upon. I only hope that you will see that all men and women are equal to you and that you have no right to deprive anyone of the gifts that God has given them, no matter what authority or power you think you possess.

Humbly,



Ammon Bundy

 View Comments

Ammon: I made a peace offering, let's see if they take it.

UPDATE 1

 Jan 22, 2023  Jan 22, 2023

 [Permalink \(Alt\)](#)

Please see Ammon's latest update on his CRIMINAL trial, originally set for Monday, January 23rd (tomorrow) here...

<https://pplsrghs.org/f6984a7c-eafc-4082-a3b4-e99dfe129733#fe460e82-b6b9-4403-a0f8-dfeb6c7914ea>

(For now, it appears there may not be a trial tomorrow, but support is still being requested.)

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 Back to Newsroom

EXHIBIT G

Newsroom



There is No Silver Bullet to Securing Liberty

Too many liberty minded Americans fall for the idea that one plot or another is going to be the answer to keeping freedom alive in America. Whether it is Common Law, Convention of the States, State Nationalist, Grand Juries or getting a Patent on your property, the results are the same. They don't work in a corrupt system! Let me explain why and what the true answer to securing liberty is.

Info Feb 1, 2023

1,334 | 111 | 6

Idaho 1N, Idaho 2, Idaho 4NE, Idaho 4NW, Idaho 4SE, Idaho 4SW, Idaho 5, Idaho 6, Idaho 7, Idaho 8, Idaho 9, Idaho 10, Idaho 11, Idaho 12, Idaho 13, Idaho 14, Idaho 15

Share (Alt)

There is No Silver Bullet to Securing Liberty

Since the Bundy Ranch incident in 2014 I have met countless people that have expressed to me what they believe the solution to securing liberty is. On most occasions I try to learn from them and give them the time to explain the details of their findings and conclusions. It is always fascinating to understand what they are expressing. Most of these people are very intelligent and have spent decades researching and documenting what they believe to be the solution to liberty. They anxiously want me to listen and champion their cause to rally the people to implement their plan and take back the rights that have been lost. However, after ample time is given to understanding the basics of their solutions and plans I always ask them one question. A question that none of them have been able to answer. Each time I ask this question the reply is always, "I don't know". This question has never failed to deteriorate the possibility of success to every proposal I have heard. Let me explain.

20 years prior to the events in 2014 my father was fighting in the courts trying to secure his property rights. My family had been ranching in the Virgin Valley for nearly 140 years, 5 generations, since 1877 and we had established strong deeds registered with the state of Nevada. My great great grandfather & mother (on my grandmother's side) were sent by Brigham Young to develop the area. With 120 degree weather and endless sink-sand forming the banks of the Virgin River my family struggled to level the fields and divert water to irrigate crops. I am sure they thought about giving up many times. There were other places that would make a much easier home to produce and live than the one they had settled in. However, driven by faith, grit and determination, they developed that hot dry desert valley into an agriculture rich oasis. During these times of struggles they also ran cattle, sheep and horse along the foothills of the Bunkerville Mountains. Looking for ways to produce food they found several natural springs that allowed them to graze cattle & sheep even when the crops in the fields had failed. Over several generations my family developed these springs creating a network of watering troughs throughout a 30 mile span. My father has been tending these springs and raising cattle in this desert now for 77 years, scratching out a meager living, just enough to raise his family of 14 children.

Most of his adult life my father has had to fight the federal government over the use of the land that he and his forefathers developed. In my lifetime I have seen my father support and promote several elected representatives, help organize a cattlemen's association, fund political groups to lobby for ranchers rights. I have seen him form teams of attorneys and even beg his fellow ranchers to unite and

stand together before it was too late. I even experienced my father speak to hundreds of ranking federal bureaucrats that gave him a standing ovation at the completion of his words. I also recognized as a young man the hardship my father endured trying to find a solution to securing his rights and heritage, especially when he was dragged through the federal courts watching his livelihood slowly pulled from his hands while most of the other ranchers around him just gave up. Shortly after the federal courts ruled that he had no right to the land my father wrote this in a notice to state officials.

"I fear that my stand is an endangerment to my life and the lives of my family members and will cause the destruction of my property rights by illegal acts of the agents of the United States. They have often attempted to paint me as a violent person when all I have done is stand up for my property rights. I have always conducted myself in a professional manner during this battle with words on paper. I take issue with anyone who would try to paint me as some wacko extremist. I do not advocate violence and only want a legal and peaceful conclusion to this issue and my rights protected. Therefore demand is hereby made that the above Nevada officials intervene and secure my 14th Amendment rights guaranteed in the Constitution and prevent an emergency which has the potential of causing the loss of me and my family's life, liberty and property. The 1st Amendment guarantees me the right to redress my government. That is what I am doing. Respectfully submitted, Cliven D. Bundy, November, 1998."

(Below quotations are from official government document)

For over 20 years, each time federal agents would provoke my father by threatening his life or property, he would call on state and county officials to protect and resolve. Because federal agents could not provoke my father into reacting in violence, justifying his removal from the land, preparation to destroy the Bundy ranch in 2014 were made by officials from the Bureau of Land Management (BLM), FBI, U.S. Attorneys Office, U.S. Fish & Wildlife, United States Forest Service (USFS) & National Park Service (NPS). In "Sensitive" government documents, officials admit that up to that point "Bundy himself is less prone to initiate or support violence". They further admit that they did not know "Bundy's threshold" or "precise trigger that would elicit a violent response", "Nor are we able to detect what his actions would be to a direct threat". However, "If pressed into a corner and faced with having to defend his property, family or person his actions may be hard to forecast". In the official "Planning" documents of the imminent action against the Bundy family a plan was laid out to vise-fully use excessive federal force to push Bundy "beyond his threshold" and either summons enough fear in Bundy to lose all "semblance of hope" and give up his claim on the land or leave him with no choice but to defend his family and property. The official plan states that; "It is important that Bundy realize that impound operations are imminent so he can develop a plan B". Further it states that; this will give "Bundy time to really weigh his options, identify and organize key players and decide how he want[s] to handle the possibility of violence". Federal officials further reveal in this plan that; "While this planning time presents a double edge sword for our LOE operations it is in our best interest to face off against a more stable and measured Bundy contingent, vice a gaged and reactive one". It is evident that the official federal plan was to exhibit such a show of force upon my father, family and the local community that it would either put us in a state of terror, causing us to lose hope or react in open defense, giving federal agents justification to arrest or dispatch anyone who would oppose them.

No matter how much my father pleaded with state officials to help secure his rights they only gave lip service to his plight. Having deeded rights registered with the state of Nevada one would conclude that the state should make some sort of effort to protect those rights. However, all pleading to state officials bore no fruit and they left him to be devoured by the powerful federal bureaucratic waiting to destroy, the same bureaucrats that 20 years prior gave him a standing ovation for powerful articulating the love he had for the land and his heritage.

Federal agents did exactly as they planned, bringing in over 200 federal agents in a military type operation against my family. The elected representatives had failed, the courts had failed, the associations had failed, the laws had failed, the state had failed, the attorneys had failed. Every effort for nearly 50 years had failed, resulting in an army of federal agents surrounding my family's ranch home, threatening our lives, turning the Virgin Valley into a real live Red Dawn scene. It was not until my father appealed to the good people across America that the situation changed. On social media and across every network that would allow, my father asked for help. Declaring what his rights are and that he was going to do whatever it took to keep them. People from all over the county came and the situation peacefully turned right side up. The federal agents left the area and my father recovered his cattle and went back to ranching. Sure, it took some time to recover, federal agents had killed around 60 cattle, cut up water tanks and destroyed corrals. But, within a relatively short period of time the ranch was back to normal and my father was experiencing more freedom to ranch than ever before.



Federal Agents at Bundy Ranch

So what made that all happen? It was not a Convention of States, it was not a Common Law Court, it was not a Grand Jury or becoming a State Nationalist. It was the people coming together in the defense of their neighbors rights. The one question I ask the people that want my buy-in on what they believe is the silver bullet to securing liberty, is this, "Who is going to enforce it"? Who is going to enforce the ruling of a grand jury? Who is going to enforce the results of a convention of states? Who is going to enforce the verdict of a common law court? Who is going to enforce the clearing of title on a patent? If you have no way to enforce liberty then you have none. The people in this country have lost the balance of power they once had. Prior to the last few generations the American people had maintained a unity and regard for individual rights that those in government feared and respected. The bureaucrats understood that they could only get away with so much or the people would forcefully put them in order. Today that balance of power is almost non-existent putting we the people in a very precarious position.

If we really want to secure liberty all we need to do is unite as a body of people determined to defend each other when rights are threatened. All we need to do is balance the power that has been usurped by the bureaucrats. Patrick Henry said, "Give me liberty or give me death". He understood that until you are willing to give your life for liberty you cannot be free. He also knew that if the people did not balance the power of government then they would lose all ability to control their own lives.

There is no silver bullet to securing liberty. It is going to take unity, suffering and the willingness to use violence in defense, like it always has. Stop believing that some convention or other plot is the answer. Stop thinking that the courts or elected representatives are going to save us. Stop worshiping the police or anyone else that secures more power to the institutions that threaten freedom. Stop wasting your time thinking that congress or the president is where the solution resides. Stop being afraid. Stop thinking that remaining free is easy, it's not! The people must balance the power that is forming against them. We must peacefully unite, plan and prepare so we are ABLE to defend ourselves as necessary. The right to defend yourself is a right that is given to you from God and a right that is protected in our founding documents. The same documents that mean nothing unless they can be enforced by the people.

Whether we unite through the People Rights Network (PRN) or some other way, unite we must. Never should we go on the offense and use violence. However, we should become proficient and CAPABLE in defending our families, faith, freedom and future, even by violence when necessary. Never in offense, only in defense. We must not allow ourselves to become so powerless that we have no ability to protect our families from those who have an endless sensation to control.



Jewish Men Being Shot By Government Agents

My commitment to you is a renewed resolve in strengthening and building a unity of people. To unite with other liberty minded networks and groups around the country. To provide effective tools to help neighbors across America communicate and act when individual rights are being threatened. To communicate better myself. In return, I pray that you will resolve to be more courageous. To act when you know you should act. To put away fear and replace it with faith in God. To not allow yourselves to get sucked into ideas that never have nor ever will bring liberty. Ideas that divide and cause contention among freedom minded people. To forgive your neighbors and love them enough to value their freedom as much as your own. To not worry so much about what others may think about you or or even what they may do to you for doing what is right. "Do what is right let the consequences follow, battle for freedom in spirit and might", one of my favorite hymns.

Sincerely Yours,

Handwritten signature of Ammon Bundy in cursive script.

Ammon Bundy

 [View 6 Comments](#)



Come no more upon me, a warning letter from Ammon Bundy

UPDATES 3

Now, in less than a week, I will be forced to defend myself again in trial, facing a team of government attorneys, for peacefully standing outside St. Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me. By the time I get out, St. Luke's executives and Holland & Hart partners with help from a few Ada County Judges will do their best to strip my family from anything we have

left.

Case Jan 17, 2023 Jan 24, 2023

11,821 185 27

Idaho 1N, Idaho 2, Idaho 4NE, Idaho 4NW, Idaho 4SE, Idaho 4SW, Idaho 5, Idaho 6, Idaho 7, Idaho 8, Idaho 9, Idaho 10, Idaho 11, Idaho 12, Idaho 13, Idaho 14, Idaho 15 Share (Alt)

From: Ammon Bundy

To: Blake Higley; Scott Bedke; Whitney Welsh; Chris Roth; Anne McDevitt; Erik Stidham; Brad Little; Keith Reynolds;

RE: Warning

I Ammon Bundy respectfully come seeking relief that my family and I may live in peace and not be harassed at your hands anymore.

As much as it pains me to do so, it is my duty to plead my case to you in why I have acted the way I have over the past few years. I pray that you will understand my intentions and see how my actions have been based in love for God and my fellow man, including yourself.

In February of 2020 I made a vow that I would not live or allow my family and friends to be compelled to live under the delusional control of tyrants pushing lockdown mandates using health orders as the excuse. I made this vow immediately after becoming aware of what officials in the state of California were doing to the people in that area. I had hoped that the same type of action would not come to Idaho, but my hopes were in vain, as in mid-March of 2020, Brad Little, Governor of Idaho, issued a statewide stay-home-order, much like California's Governor Gavin Newsom did earlier that month.

Knowing very well that no state or other official has been granted the authority to order my friends, family or I to remain in our homes until we have their permission to leave. Knowing that no man or group of people have the right to order other men or women to stop trading with each other in an effort to provide for their families. Knowing that no man or group of people have the right to order other men or women not to visit and care for each other. Knowing that state officials have only been granted authority enumerated in the state and United States Constitutions. Knowing above all things that the right to travel, the right to visit with and care for each other, the right to leave our homes at will, the right to trade and provide for our families are endowed by God the Almighty Creator to each of His children residing upon this earth, and that no government official has the authority to alienate these rights from His children unless in defense of their own rights.

Knowing these things, I began to act openly in peaceful defiance of the immoral and unconstitutional usurpations coming from government officials within the state of Idaho. Holding regular public meetings, an Easter service, peacefully protesting at a Meridian police officer's home for arresting a mother who took her children to the park and organizing people to peacefully stand for the rights that God had given them. Never once did I damage any property, commit any violence or harm any person. It is not in my nature to do so.

However, these simple peaceful acts of non-compliance caused heads of several government agencies to communicate with each other about what should be done with Ammon Bundy. In one email chain between the head of the Idaho State Police, Colonel Kendrick Wills, Meridian Police Chief, Meridian Mayor, Robert Simison, the FBI JTTF (Joint Terrorist Task Force), Ada County Sheriff, Steve Bartlett, and several other heads of government agencies and offices in Idaho, all discussed to potentially raid the Easter service I had planned and mass arrest those attending. Imagine, in the United State of America, in the State of Idaho, heads of law enforcement and other officials plotting to raid a Christian worship service on Easter. And doing so because those assembling to worship God did not have permission from government officials to do so. Ultimately, these officials decided not to move forward with the raid and mass arrests because the Easter service was held in Gem County on private property. It is my belief that the Gem County Sheriff and Emmett Mayor did not support the action so they did not move forward with the raid.

In August 2020, Governor Little called for a special legislative session to gain legal immunity for the action of state officials during the lock-down orders. When the session began, hundreds of people came to the Idaho capitol building to attend. However, Scott Bedke, Speaker of the House, ordered the House gallery doors to be locked, guarded by Idaho State Police Troopers; stopping hundreds of people from legally attending the session. This caused many people to become very upset and eventually we pushed our way through the locked doors. I must mention that Idaho State law prohibits the doors to the House or Senate galleries from being locked at any-time during a regular or special session. Regardless, this law did not seem to matter to Speaker Scott Bedke or to the Idaho State Police Troopers. In-fact, instead of apologizing to the people for illegally blocking the doors, the next day, nearly half of the all the ISP Troopers in Idaho were ordered to report for duty at the capitol building. That afternoon an incident with the independent media was fabricated and I was arrested. My crime was sitting quietly and non disruptive in a public room in the Idaho capitol building (the Lincoln auditorium), during open hours, where no proceedings were taking place. The Lincoln auditorium doors were always open to the public until 7 PM each day. However, that day, at 5 PM, over 60 police officers entered the room and area and ordered me to leave. When I did not leave immediately, I was arrested and trespassed from the capitol building for a year. During my trial, over a year later, multiple police officers testified that I was *"not being disruptive and had broken no rules"*(please watch this video).

I do admit, at this point I became somewhat irrational. For I believed that I had a right to go into the Idaho capitol building and participate in the legislative process. I believed that the capitol building belonged to the people and not the government. I believed that somehow the people were going to make a difference in the capitol building and that I was to help motivate and unite them. And, I believe that I was targeted and falsely arrested so I could not influence the legislators or the people during that and the following sessions.

Ultimately, I was arrested 3 more times for going back to the capitol building to attend legislative proceedings. Each time I was thrown in jail and sorely abused under the hand of the Ada County jailers.

To make matters worse, when I showed up to my first trespass trial, I was not allowed in the Ada County Courthouse because I would not wear a mask. After many attempts to get permission to go into the courthouse to attend my own trial, over a dozen Ada County Sheriff deputies exited the courthouse and arrested me for Failure to Appear (FTA) to my trial. On this occasion I spent 32 hours in an extremely cold holding cell in the Ada County Jail. The jailers refer to this cell as *"the cold box"*. It was very miserable and cruel.

For the next year and a half, I spent much of my life litigating these cases. Never once had I damaged any property, committed any violence or harmed any person. Yet, I was viciously prosecuted at the hands of a team of Ada County Attorneys. In the middle of these trials, I was also sentenced to 10 days in jail and fined \$3,000 (the maximum sentence possible) for Contempt of Court (COC). Judge Annie McDevitt disagreed with me in using campaign service hours for public service time. So, with no opportunity to redo the hours and with no jury involved, she threw the book at me and I spent 10 more days in solitary confinement in the Ada County Jail. I am sure to this day she believes that I deserve such a harsh punishment, but even my critics vocalized their surprise at her extreme and unusual sentence.

In early March of 2022, I received a call from my friend's daughter Marissa Anderson. She was surrounded by police officers threatening to take her baby away. The Chavoya family are good friends of my family and we have spent much time together. They are one of the most loving, caring and politically active families that I know. The love and care they display to each other and to their friends is inspiring to all those who know them. Marissa's father Diego and I, during 2020, became two of the most public figures in Idaho speaking out against the governor's lockdown orders. Especially against the massive federal funds that were being distributed into Idaho institutions due to Governor Little keeping Idahoans under executive emergency powers for over 2 years.

So, after participating in much public scrutiny against the most powerful people in Idaho, police officers surrounded Diego's family and forcefully took his grandson under a false pretense of child neglect. Eventually, the accusations against the family were all proven to be absolutely false. Over time, the state had to give baby Cyrus back, drop the CPS case all together and dismiss the criminal charges against Marissa the mother and Miranda the aunt. However, I do not find it a coincidence that St. Luke's Hospital, the #1 PRIVATE beneficiary of the federal COVID funds coming through Governor Little and the Idaho Department of Health and Welfare (IDHW), the #1 PUBLIC beneficiary of the COVID funds, are the two institutions that carried out the assault against the Chavoya family, who happens to also be some of my best friends. They did so by falsely reporting baby Cyrus' condition and sending the police after them.

That night, being extremely concerned for baby Cyrus, the family and the entire injustice of the situation, I showed up at St. Luke's Hospital where baby Cyrus was taken, demanding that he be given back to his family. After many demands, Meridian Police Officers arrested me and took me to the Ada County Jail. I must say, even though the Meridian Police Officers were completely in the wrong and acted to enforce the will of people grossly abusing the law, they were also lied to by officials from the Idaho Department of Health and Welfare (CPS). They were told that baby Cyrus was Failing to Thrive (FTT) and that he must be taken to the hospital for immediate care.

However, the evidence tells an entirely different story. Baby Cyrus was not taken to the hospital for care, he was forcefully taken from his parents and brought to the hospital to be immediately given to foster parents. Yes, this is correct, waiting there patiently in Meridian St. Luke Hospital were baby Cyrus' new foster parent(s). Baby Cyrus was deemed "a healthy baby" by the medical staff who told the foster parent(s) to "leave promptly". However, because of the commotion that I and those with me were causing outside the hospital by peacefully demanding Cyrus be given back to his parents, the foster parents had lost their will to take the baby and therefore Cyrus was transferred to Boise St. Luke's Hospital instead.

Read these hospital reports from that night:

"Health and welfare identified a foster family but due to protesters surrounding the hospital regarding this case, it was felt that discharge with the family foster family from the emergency department was unsafe for all involved."

"The sending physician handed us the pt [i.e. patient] secured in his car seat. She indicated the patient was in stable condition and requested that we leave promptly. She stated, "just go! This is a healthy baby with no interventions"...no acute life threats noted."

The Idaho Department of Health and Welfare (CPS) mis-represented the truth about baby Cyrus, causing this entire situation. Baby Cyrus was and has always been cared for and loved to the extreme by his parents and family. His mother was breastfeeding and he had been thriving since birth, even though recently he was not reacting well to solid foods (not atypical for his age). CPS with the help of Meridian Police Officers took Cyrus away from his main source of nutrition (his mother), which was very concerning to many people, including myself. I felt I had the ability to bring attention to the matter and did so at the hospital by demanding that baby Cyrus be returned to his nursing mother.

Because of this incident, I and my family have once again suffered under the hands of Ada County Prosecutors for an additional year. The CPS case against baby Cyrus' parents was dropped, the criminal case against baby Cyrus' aunt was dismissed, the criminal case against baby Cyrus' mother was dropped, but the case against me continues to go on and is scheduled for trial this month. If convicted, I face heavy fines and up to 1 year in jail. The Ada County Chief Judge, in the middle of these proceedings, reassigned my case to Judge Annie McDevitt, the same judge who already threw the book at me once and sentenced me to 10 days in jail and a \$3000 fine. Normally, Contempt of Court (COC) is a fine of a few hundred dollars with no jail time. So, it doesn't take legal training to understand what she will try and do to me if I am convicted this time for helping baby Cyrus and his family.

It took about 6 days to get baby Cyrus back to his parents. The people at the Idaho Department of Health and Welfare (CPS) and Judge Laurie Fortier did not like the public scrutiny they were receiving and gave baby Cyrus back after about a week of hundreds of people protesting at St Luke's Hospital, the CPS office and the Judge's home. A few weeks later, St. Luke's Hospital sued Diego Rodriguez (Cyrus' grandfather) and myself for saying negative things about them. They retained Holland & Hart, LLP a law firm that also represents Governor Brad Little, Scott Bedke and the Idaho Department of Health & Welfare.

Each week, going on 5 months now, Diego and I have received mountains of court documents. Holland & Hart is sending documents to my business, home and associates, by personal service companies, Gem County Sheriff's deputies, US Postal Service, Fed-Ex and UPS. Some documents are too big to print so they send electronic files in packages to contain it all. Without exaggerating, I could have filled up a garbage dumpster to contain the amount of legal documents I have received from Holland & Hart. After speaking to an Idaho law firm (in hopes to defend myself) I was told that it would take at least 3 full time attorneys to respond to Holland & Hart's litigation on this case. Because this case may continue for several years, it is not impractical to calculate that it would take hundreds of thousands of dollars to properly defend against the onslaught of litigation paid for by donations given to St. Luke's Hospital.

I was informed by two very credible, independent sources (one a high-ranking Ada County Official and the other an attorney who works with St. Luke's hospital) that St. Luke's CEO gave Holland & Hart a blank check to financially destroy Diego and I for speaking out against them in the role they played in taking baby Cyrus. So, rather than taking action to ensure that the situation with baby Cyrus does not happen again, instead, St. Luke's CEO, Chris Roth, has authorized hundreds of thousands of dollars of donations given to St. Luke's Hospital to pay a law firm to financially destroy baby Cyrus' family and those who stood with them. I don't believe this is why people donate to St. Luke's Hospital. I believe those who donate to St. Luke's Hospital are under the impression that their donations are going to medically help children and other patients, not to fund a team of \$600 per hour bureaucrat attorneys sent to even a political score.

To date, St. Luke's team of attorneys have used the courts to put a lien on my home, forcing me to sell it. I have been forced to liquidate all my assets except a few and my family and I have no idea when any of this will end. St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. Mis-using the courts, they have put us under constant threat of losing everything we have worked for our entire lives. Never once have I knowingly stepped inside a St. Luke's medical facility in Idaho. Never have I or my family received any medical treatment from a St. Luke's provider. Lowe them nothing, yet they are trying to take everything. Anything I said about them (which was very minimal) I believe to be absolutely true, but they are using the courts to chill free speech and punish anyone who exposes them to the public. All of this, when they are the people who participated in stealing a baby from loving parents. Holland & Hart receiving open payments from St. Luke's Hospital to destroy lives by abusing the court is a prime example of Judicial Terrorism (JT).

In the last few years, I have been criminally charged many times for defending what the Idaho State and U.S. Constitutions were designed to protect. I have had so many court hearings that I have lost track of the number. I have endured multiple trials and spent weeks in solitary confinement in the Ada County Jail. I have been forced to sell my home and assets, been fined thousands of dollars and have not been able to rightfully provide for my family. Now, in less than a week, I will be forced to defend myself again in trial against criminal trespass charges, facing a team of government attorneys, for peacefully standing outside St. Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me, sentenced by Judge Annie McDevitt. I am certain if I am thrown in jail, by the time I get out, St. Luke's Executives and Holland & Hart Partners with help from a few Ada County Judges, will do their best to take everything they can from me and strip my family from anything we have left.

Never once have I damaged any property, committed any violence or harmed any person. I have remained peaceful and stood for peaceful remedies even when forceful actions in defense may have been justified. I have stood as a barrier in protecting the very people who are harming me from those who believe that sometimes a way to right a wrong is not always peaceful. Everything I have done has been peaceful, even when police officers have falsely arrested me, abused me, my family and my friends and caused me to bleed by violence. Even when jailers have cruelly forced me to suffer for days. Even when judges have taken my income, wealth and stripped me of my rights. Even when the courts have allowed judicial terrorists to use the force of law to harass and financially assault my family. I pray every day to my Father in Heaven for the resolve to remain peaceful, but feel I have the justification to call upon my friends and defend myself by any means, even though I have no intention at this point to do so.

My only desire is to be left alone! But I cannot stand by when the rights to life, liberty and property are being violated all around me. It is my belief that if a man or woman smites me or my family once I should bear it patiently and not revile against them. If they smite me or my family a second time, I should not revile against them. But if they smite me or my family a third time I should bear it patiently as a testimony against them, but warn them, in the name of Jesus Christ, that they come no more upon me or my family, and if they do so, God will deliver them into my hands. However, if they repent at any time, I should forgive them. I have full faith in these words and intend to live by them.


I therefore warn; Blake Higley, Scott Bedke, Whitney Welsh, Chris Roth, Annie McDevitt, Erik Stidham, Brad Little and Keith Reynolds, in the name of Jesus Christ, that you come no more upon me or my family. I pray that I will be even more patience than I have been and hope that you will repent of your violations against the people of Idaho and myself. There is not one person that I hate or wish harm to come upon. I only hope that you will see that all men and women are equal to you and that you have no right to deprive anyone of the gifts that God has given them, no matter what authority or power you think you possess.

Humbly,



Ammon Bundy

Attachments

 warning.pdf (73 KB)

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EXHIBIT H

St. Luke's files lawsuit against Ammon Bundy alleging harassment, defamation

by CBS2 News Staff
Wednesday, May 11th 2022



St. Luke's (CBS2 file)





lawsuit against Ammon Bundy and some of his f services.

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g of harassment, false statements and trespassing. St. Luke's claims the defendants incited a protest at a hospital in Boise, resulting in a lockdown that interfered with patient care.

This alleged harassment was triggered by a child protective services case in March. The defendants stated that St. Luke's had kidnapped a child and that they were running a "child trafficking ring subsidized by tax dollars," the lawsuit claims.

St. Luke's affirms that the Idaho Department of Health and Welfare intervened in that case out of fear for the infant's wellbeing after the parents wouldn't seek care for the infant.

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"It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community," said Chris Roth, president and CEO of St. Luke's Health System.

The lawsuit lists Ammon Bundy and his campaign, Diego Rodriguez, Freedom Man Press and PAC, and the People's Rights Network as defendants.



were harmed by the defendants as well.

55° 63° 63°

The hospital system has requested a jury trial for eight individual counts against the

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and to

prevent the defendants from engaging in future harassment.

St. Luke's is also asking for a minimum of \$50,000 in damages, plus attorney and court fees.

Boise hospital sues Ammon Bundy, others involved in protests over child welfare case



Ian Max Stevenson, Idaho Statesman

Idaho

Published at 3:23 pm, May 11, 2022

Updated at 3:23 pm, May 11, 2022



Ammon Bundy | Courtesy Idaho Statesman

BOISE (Idaho Statesman) — St. Luke's Health System has filed a lawsuit against far-right Idaho gubernatorial candidate Ammon Bundy and others involved in a slew of protests in March related to a child protective services case — protests that prompted the hospital to go on lockdown.

The St. Luke's complaint was filed in Ada County on Wednesday, with Bundy; his activist organization, the People's Rights Network; and Diego Rodriguez, a Bundy campaign adviser and the grandfather of the child involved in the case, as named defendants.

Other defendants are Bundy's campaign, and a website and political action committee operated by Rodriguez.

RELATED | Ammon Bundy arrested in trespassing case at St. Luke's after police take 10-month-old

In March, police took custody of a 10-month-old baby at a gas station in Garden City after authorities said they feared the baby's weight loss was potentially life-threatening. Bundy drove to St. Luke's Meridian Medical Center that same evening and eventually was arrested for misdemeanor trespassing.

Over the ensuing days, protesters gathered at St. Luke's Boise Medical Center, where they believed the baby was being cared for, and at the private homes of individuals involved in the case.

RELATED | Lockdown ends at St. Luke's Boise; Ammon Bundy sent protesters there

“The complaint alleges there was a concerted effort to disrupt St. Luke’s business through false statements related to care and repeated defamation of St. Luke’s parties,” said a Wednesday statement from St. Luke’s.

The hourlong lockdown “interfered with St. Luke’s ability to provide care for our community,” according to the statement.

“It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community,” St. Luke’s President and CEO Chris Roth said in the statement.

The lawsuit aims to force the defendants to cease “ongoing harassment and to remove defamatory and false material they have posted and shared online,” according to the St. Luke’s statement. It also asks for \$50,000 in damages, which the hospital said would be donated to a St. Luke’s program that evaluates children for alleged

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https://www.idahopress.com/news/local/st-lukes-files-lawsuit-against-ammon-bundy-others-for-harassment-intimidation-during-child-welfare-case/article_192085c4-d7d4-5332-835d-2db1f3b16458.html

St. Luke's files lawsuit against Ammon Bundy, others for 'harassment,' 'intimidation' during child welfare case

By CAROLYN KOMATSOULIS ckomatsoulis@idahopress.com

May 11, 2022



Far-right activist Ammon Bundy speaks to a crowd of about 50 followers in front of the Ada County Courthouse in downtown Boise, Idaho, April 3, 2021.

AP

St. Luke's Health System filed a lawsuit in state court Wednesday on several counts against Gubernatorial Candidate Ammon Bundy, Diego Rodriguez, and related entities like the People's Rights Network.

The counts include defamation (libel and slander), invasion of privacy, intentional infliction of emotional distress, unfair business practices, wrongful charitable solicitations, two counts of trespassing, and civil conspiracy to commit all of the above counts.

The lawsuit stems from a March incident when Child Protective Services took Rodriguez's grandson into custody after determining he was malnourished.



Protesters gather outside St. Luke's Hospital in downtown Boise on Monday, March 14. The gathering was in response to the removal of a 10-month-old child by Child Protective Services because of concerns over the baby's welfare.

Brian Myrick / Idaho Press

"It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community," said Chris Roth, president and CEO of St. Luke's Health System.

A call to Bundy seeking comment did not go through.

Soon after the incident, Bundy was arrested at St. Luke's Meridian and he and Rodriguez began a campaign against CPS, St. Luke's and other entities they deemed to have medically kidnapped the baby.

At one point, St. Luke's Boise went into lockdown and four patients had to be taken by ambulance for care elsewhere. Protestors also called the hospital system's phone lines, preventing people from reaching staff, the Idaho Press previously reported.

St. Luke's requested a jury trial and monetary damages of at least \$50,000.

The lawsuit alleges that Bundy and Rodriguez sought to benefit financially and enhance their standing among their followers. The two, along with other defendants, set up a "knowingly dishonest and baseless smear campaign," the lawsuit said and spread a conspiracy that the government kidnapped and trafficked children.

In the lawsuit, St. Luke's denied many allegations made by Bundy, Rodriguez and others during the March incident. The baby was not vaccinated against the wishes of the parents, the lawsuit said, nor did St. Luke's harm or abuse the infant.

"Such statements were false and were intended to attract media attention, incite followers, collect donations, disrupt hospital operations, and defame the St. Luke's Parties," the suit alleges.

In March, a crowdfunding campaign was set up by a friend of the family and has raised \$114,000 since its inception.

The hospital informed the parents they likely qualified for Medicaid, the lawsuit said.

"St. Luke's currently estimates that Medicaid will cover the Infant's medical bills for both ER visits and admissions," the lawsuit said. "Despite absence of insurance, the Infant's family is unlikely to have any outstanding balance due to St. Luke's."

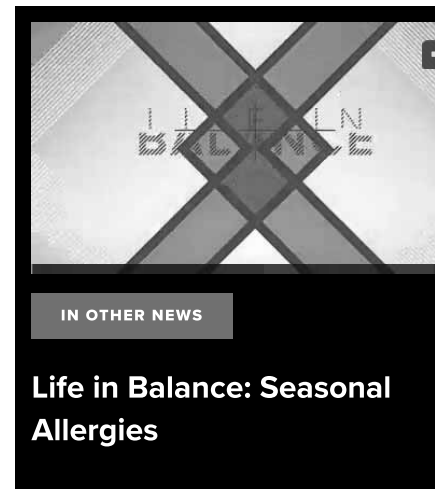
LOCAL NEWS

St. Luke's files lawsuit against Ammon Bundy and others, over 'intimidation, disruption'

St. Luke's alleges there was a "concerted effort to disrupt" hospital business, using false statements related to a child protective services case in March 2022.



Credit: KTVB
Exterior of St. Luke's in Boise.



Author: KTVB Staff
Published: 3:08 PM MDT May 11, 2022
Updated: 3:13 PM MDT May 11, 2022



BOISE, Idaho — St. Luke's Health System filed a lawsuit Wednesday against what they call a "coordinated campaign of harassment and intimidation" against its employees over a March protest at the downtown Boise hospital that prompted a temporary lockdown.

The defendants named in the lawsuit include Ammon Bundy, Diego Rodriguez, Freedom Man Press and other related entities.

St. Luke's says there was a "concerted effort to disrupt" hospital business by trespassing at both the Meridian and Boise hospital campuses and false statements related to a child

protective services case. According to the lawsuit, the hospital and its staff were also attacked online attacks related to the case.

“It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community,” Chris Roth, president and CEO of St. Luke’s Health System, said.

According to the suit, the defendants called on their supporters to protest at St. Luke’s Boise, forcing ambulances to divert and the hospital to warn doctors, nurses, and other employees not to enter or leave the building.

“St. Luke’s has not been the only target of these individuals and believes that no one should be subject to such abuse. Inaction would signal this type of behavior is acceptable in our community. It is not,” Roth said.

In the lawsuit, St. Luke's says its aim is to stop the defendants from their ongoing harassment and to remove the defamatory and false statements they have posted and shared online and on other platforms.

St. Luke's is also seeking no less than \$50,000 in monetary damages, or whatever sum is proven at trial, which the hospital has vowed to donate to Children at Risk Evaluation Service (CARES).

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HEALTH

St. Luke's hospital system sues Bundy, Rodriguez, People's Rights and others

Lawsuit alleges defamation, harassment surrounding a 2022 child protection case in Idaho

BY: AUDREY DUTTON - MAY 11, 2022 3:07 PM



📷 St. Luke's downtown Boise hospital was on lockdown and diverted patients to other health facilities for about an hour, after Ammon Bundy and others encouraged their followers to show up at the facility to protest a child protection services case. (Idaho Capital Sun)

Idaho's largest hospital system on Wednesday filed a lawsuit against Ammon Bundy, Diego Rodriguez, the People's Rights Network and others in response to "the targeted and damaging

activities” surrounding a child protection case this year, according to a news release.

St. Luke's Health System said in the release that it chose to sue over “a coordinated campaign of harassment and intimidation against St. Luke's and its team members” and that Bundy, Rodriguez and the other defendants were “responsible for these actions ...”

The lawsuit alleges false statements and defamation, trespassing on two St. Luke's hospital campuses and “sustained online attacks,” the release said.

It says that Bundy, Rodriguez and their organizations launched “a knowingly dishonest and baseless smear campaign” that, among other things, claimed St. Luke's “engaged in widespread kidnapping, trafficking, and killing of Idaho children.”

Bundy and Rodriguez could not be reached for comment.

Rodriguez created a website through his Freedom Man PAC organization that made allegations against St. Luke's and Idaho's child protection system. (The website identifies the child, whose identity the Idaho Capital Sun has chosen not to share.) More than \$100,000 was donated to Rodriguez's family through an associated fundraising campaign.



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One of the plaintiffs in the complaint, filed in Ada County court, is a physician whose photo and name was shared on social media by people who opposed the decision by Idaho's child protection system to place Rodriguez's grandchild in foster care. The child was hospitalized for several days and treated for malnutrition and other issues.

St. Luke's on March 15 went into lockdown for more than an hour, in response to a security threat, the health system said that day. Patients and ambulances had to be diverted from the Boise hospital, and staff and patients couldn't enter or exit the hospital. Phone lines also were tied up around that time, as members of the public called the hospital about the case.

“It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community,” Chris Roth, president and CEO of St. Luke's Health System, said in the release. “St. Luke's has not been the only target of these individuals and believes that no one should be subject to such abuse. Inaction would signal this type of behavior is acceptable in our community. It is not.”

St. Luke's asks the Fourth District Court in Ada County to order the defendants to stop “their ongoing harassment and to remove defamatory and false material they have posted and shared online and through other platforms,” the release said.

The St. Luke's lawsuit also seeks monetary damages, but the health system plans to donate any money it receives to the Children at Risk Evaluation Service program, it said in the release.

Bundy is running as an independent candidate for governor.



St. Luke's suing Ammon Bundy over March lockdown

They say the lockdown prevented them from entering or exiting the building and being able to provide care for patients



KMVT sister station KBOI reported St. Luke's in Boise went into lockdown back in March (KBOI CBS2)

By KMVT News Staff

Published: May. 11, 2022 at 3:25 PM MDT | Updated: 43 minutes ago



BOISE, Idaho (KMVT/KSVT) — The St. Luke's medical system announced Wednesday they have filed a lawsuit against Ammon Bundy and others over a March protest that forced a hospital into lockdown.

The incident stems from Bundy and a collection of his supporters protesting outside St. Luke's Boise over a child custody case involving a family friend.

Their complaint alleges a concerted effort to disrupt St. Luke's through false claims and defamation of St. Luke's parties.

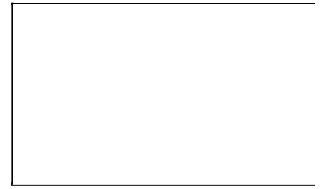
St. Luke's says the lockdown prevented them from entering or exiting the building and being able to provide care for patients.



Diego Rodriguez and Freedom Man Press were other entities named in the lawsuit.

"It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community," said Chris Roth, president and CEO of St. Luke's Health System.

They say their suit aims to stop "the defendants from their ongoing harassment and to remove defamatory and false material they have posted and



https://www.idahostatesman.com/news/local/community/boise/article261352242.html?utm_source=pushly&intcid=pushly_2117776

Hospital sues Ammon Bundy, others involved in Boise protests over child welfare case

Ian Max Stevenson, Idaho Statesman
May 11, 2022



Ammon Bundy is shown in front of a restaurant Jan. 27, 2021, in Emmett, Idaho. The far-right Idaho gubernatorial candidate and others involved in a slew of protests in March related to a child protective services are being sued by a Boise hospital. (Richard Read/Los Angeles Times/TNS) Ammon Bundy is shown in front of a restaurant Jan. 27, 2021, in Emmett, Idaho. The far-right Idaho gubernatorial candidate and others involved in a slew of protests in March related to a child protective services are being sued by a Boise hospital. (Richard Read/Los Angeles Times/TNS)

Richard Read/Los Angeles Times/TNS

BOISE, Idaho — St. Luke’s Health System has filed a lawsuit against far-right Idaho candidate Ammon Bundy and others involved in a slew of protests in March related to a child protective services case — protests that prompted the hospital to go on lockdown

The St. Luke’s complaint was filed in Ada County on Wednesday, with Bundy; his activist organization, the People’s Rights Network; and Diego Rodriguez, a Bundy campaign adviser and the grandfather of the child involved in the case, as named defendants.

Other defendants are Bundy’s campaign, and a website and political action committee operated by Rodriguez.

JUDGE RULES IN FAVOR OF GREENIDGE

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In March, police took custody of a 10-month-old baby at a gas station in Garden City after authorities said they feared the baby’s weight loss was potentially life threatening. Bundy drove to St. Luke’s Meridian Medical Center that same evening and eventually was arrested for misdemeanor trespassing.

Over the ensuing days, protesters gathered at St. Luke’s Boise Medical Center, where they believed the baby was being cared for, and at the private homes of individuals involved in the case.

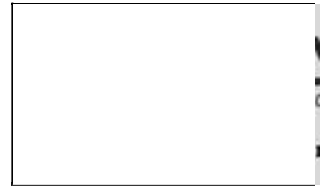
“The complaint alleges there was a concerted effort to disrupt St. Luke’s business through false statements related to care and repeated defamation of St. Luke’s parties,” said a Wednesday statement from St. Luke’s.

The hourlong lockdown “interfered with St. Luke’s ability to provide care for our community,” according to the statement.

“It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community,” St. Luke’s President and CEO Chris Roth said in the statement.

The lawsuit aims to force the defendants to cease “ongoing harassment and to remove defamatory and false material they have posted and shared online,” according to the St. Luke’s statement. It also asks for \$50,000 in damages, which the hospital said would be donated to a St. Luke’s program

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Hospital sues Ammon Bundy, others involved in Boise protests over child welfare case

Ian Max Stevenson - Idaho Statesman (TNS)
May 11, 2022

BOISE, Idaho — St. Luke’s Health System has filed a lawsuit against far-right Idaho gubernatorial candidate Ammon Bundy and others involved in a slew of protests in March related to a child protective services case — protests that prompted the hospital to go on lockdown.

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In March, police took custody of a 10-month-old baby at a gas station in Garden City after authorities said they feared the baby’s weight loss was potentially life threatening. Bundy drove to St. Luke’s Meridian Medical Center that same evening and eventually was arrested for misdemeanor trespassing.

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St. Luke's sues Ammon Bundy, others involved in Boise protests over child welfare case

BY [IAN MAX STEVENSON](#) AND [KEVIN FIXLER](#)

UPDATED MAY 11, 2022 7:39 PM



Gubernatorial candidate Ammon Bundy will run as an independent candidate and will not be in the Republican primary. He filed the required 1,000 signatures to the Secretary of State on March 10, 2022. BY [SARAH A. MILLER](#) 📧

St. Luke's Health System has filed a lawsuit against Ammon Bundy, a far-right independent candidate for Idaho governor, and others involved in a slew of protests in March related to a child protective services case — protests that prompted the hospital to go on lockdown.

The St. Luke's complaint was filed in Ada County on Wednesday, with Bundy; his activist organization, the People's Rights Network; and Diego Rodriguez, a Bundy campaign adviser and the grandfather of the child involved, as named defendants.

Other defendants are Bundy's campaign, and a website and political action committee operated by Rodriguez.

In March, police took custody of a 10-month-old baby at a gas station in Garden City after authorities said they feared the baby's weight loss was potentially life-threatening. Bundy drove from his home in Emmett to St. Luke's Meridian Medical Center that same evening and eventually was arrested for misdemeanor trespassing after trying to get authorities to release the child.

Over the next week, a series of protests, orchestrated by Bundy and his People's Rights organization, drew crowds at St. Luke's Boise Medical Center, where protesters believed the baby was being receiving care. Lt. Gov. Janice McGeachin, a candidate for governor in the Republican primary, also attended one of the protests, Rodriguez told the Statesman.

In addition, protests took place at the Ada County Courthouse, where the custody matter was adjudicated, and at the Idaho Department of Health and Welfare headquarters, which oversees Idaho's child welfare and foster care programs.

"The complaint alleges there was a concerted effort to disrupt St. Luke's business through false statements related to care and repeated defamation of St. Luke's parties," said a Wednesday statement from St. Luke's.

The hourlong lockdown "interfered with St. Luke's ability to provide care for our community," according to the statement.

Bundy and Rodriguez did not immediately respond to requests for comment.

"It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community," St. Luke's President and CEO Chris Roth said in the statement.

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UPDATE ON THE CHILD WELFARE CASE

A week ago, McGeachin told attendees at a voter rally that the matter related to the parents of the child was dismissed earlier in the day. McGeachin had weighed in on the family custody situation, seeking Gov. Brad Little's involvement to return the child to his parents, which Little declined to do through an attorney.

At the rally, which included several of the state's right-wing candidates for office, McGeachin called the result a "miracle." The crowd of about 1,000 people responded with loud cheers and applause.

Later during the event, members of the family, including Rodriguez, appeared on stage at Julius M. Kleiner Memorial Park in Meridian, holding the child.

Child welfare matters are confidential in Idaho, and the state's Department of Health and Welfare has declined to comment about individual cases.

"The work of child welfare is guided by the assessment of the assigned worker as to the safety of the child or children in the family," Greg Stahl, a spokesperson for Health and Welfare, said in an email to the Idaho Statesman, speaking generally about the process. "Once the worker assesses that the child can safely be in their home without intervention or supervision, the case and the department's involvement in the family can cease.

"There are some cases where children are removed from a home due to imminent danger safety concerns related to the parenting in the family and the parents quickly understand the concerns and work collaboratively with the department to address those concerns to meet the needs of their children. This is a very positive outcome for children and families and we are always excited when this happens."

A CUSTODY BATTLE AND A WEEK OF PROTESTS

Concerns about the health of the 10-month-old sparked the state's action and the week of protests in March. While the child was in state custody, the family maintained that he had lost an insubstantial amount of weight and that his parents were working to find him more nourishing foods.

Organizers of the protests personally targeted those who had been involved in the case, posting photos, names and home addresses of police officers, a social worker, a nurse practitioner and an Ada County magistrate judge online. Those involved were called "perpetrators," and right-wing activists went to their homes. Signs at protests were labeled "WANTED" and "HANDS OFF OUR KIDS!"

Roughly a week after the state took custody of the child, he was returned to his parents. Shortly after, a planned protest at the magistrate judge's house was canceled.

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Idaho hospital files lawsuit against Ammon Bundy alleging harassment, defamation

by KBOI STAFF
Wednesday, May 11th 2022



Idaho hospital files lawsuit against Ammon Bundy alleging harassment, defamation (KBOI)



BOISE, Idaho (KBOI) – A hospital in Idaho has filed a lawsuit against Ammon Bundy and some of his supporters, alleging harassment and disruption of services.



St. Luke's Health System calls a "smear campaign" consisting of a "child protective services case in March. The defendants stated that St. Luke's had kidnapped a child and that they were running a "child trafficking ring subsidized by tax dollars," the lawsuit claims.

protest at a hospital in Boise, resulting in a lockdown that interfered with patient care.

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This alleged harassment was triggered by a child protective services case in March. The defendants stated that St. Luke's had kidnapped a child and that they were running a "child trafficking ring subsidized by tax dollars," the lawsuit claims.

St. Luke's affirms that the Idaho Department of Health and Welfare intervened in that case out of fear for the infant's wellbeing after the parents wouldn't seek care for the infant.

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“It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community,” said Chris Roth, president and CEO of St. Luke's Health System.

The lawsuit lists Bundy and his campaign, Diego Rodriguez, Freedom Man Press and PAC, and the People's Rights Network as defendants.

St. Luke's claims that other hospital systems were harmed by the defendants as well.



trial for eight individual counts against the
to remove the allegedly false accusations and to
prevent the defendants from engaging in future harassment

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St. Luke's is also asking for a minimum of \$50,000 in damages, plus attorney and court fees.



FILE - Ammon Bundy glances toward the prosecution table during a pause in his trial to clarify a line of questioning with the jury dismissed in Ada County Magistrate Judge Kim Dale's courtroom Tuesday, March 15, 2022, in Boise, Idaho. An Idaho hospital that went on lockdown in March after far-right activists protested outside is suing Bundy, Diego Rodriguez and their various political organizations for defamation and "sustained online attacks." St. Luke's Health System filed the lawsuit Wednesday, May 11 against Bundy, his gubernatorial campaign, and the People's Rights Network organization. (Darin Oswald/Idaho Statesman via AP, File) DARIN OSWALD AP



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BOISE, IDAHO

An Idaho hospital that went on lockdown in March after far-right activists protested outside is suing Ammon Bundy, Diego Rodriguez and their various political organizations for defamation and "sustained online attacks."

St. Luke's Health System filed the lawsuit Wednesday against Bundy, his gubernatorial campaign, and his People's Rights Network organization. The hospital system is also suing Diego Rodriguez — the grandfather of the child involved in the protection case — as well as Rodriguez's website Freedom Man Press and the Freedom Man political action committee. Rodriguez is an associate of Bundy's who has been active in Bundy's political campaign.

The child protection case involved a 10-month-old baby who was temporarily removed from family custody in March after officials determined the infant was "suffering from severe malnourishment" and at risk of injury or death, the Meridian Police Department said at the time. The baby's parents had refused to let officers check on the child's welfare after the family canceled a medical appointment, the police statement said.

TOP VIDEOS





Bundy, who is well-known for participating in armed standoffs with law enforcement, was arrested the following day on a misdemeanor trespassing charge after he protested at a different hospital where he believed the baby was being treated. He also asked his followers to protest at the hospital and the homes of child protection service workers, law enforcement officers and others involved in the child protection case. Rodriguez, meanwhile, wrote on his website that the baby was “kidnapped,” and suggested that the state and people involved in the case were engaged in “child trafficking” for profit.

The men also told followers to protest at the Boise hospital on March 15. The facility went on lockdown for more than an hour, diverting emergency patients to other area hospitals, after hospital officials determined the protests presented a safety risk.

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In the lawsuit, St. Luke's Health System contends that the two men “worked together to manufacture a false narrative of a state-sponsored child kidnapping and trafficking ring” that included the hospital, the Department of Health and Welfare, law enforcement officials and others.

“They realized the facts surrounding DHW's intervention could be mischaracterized as a governmental conspiracy to kidnap, traffic and kill children,” the hospital system's attorney wrote in the lawsuit. “Then, in turn, Defendants realized they could establish themselves as crusaders against their falsely manufactured governmental conspiracy.”

The defendants wanted to generate interest in Bundy's political campaign for governor, raise their public profiles and create financial gain in the form of donations from followers, the hospital system contends.

Neither Bundy nor Rodriguez immediately responded to emails requesting

making defamatory statements.

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The image shows a video player interface. At the top right, there is a small text 'Progressi...'. The main video area displays a woman in a dark top. Overlaid on the video is a large graphic with the text 'All signs point to saving...' and 'Drivers who switch with Progressive save an average of over \$700.' Below this graphic is a 'Learn More' button. At the bottom of the video player, there are social media sharing icons for Facebook, Twitter, and LinkedIn, along with a progress bar showing '0:14 / 0:14' and a volume icon. Below the video player, there is a caption: 'All signs point to saving big with Progressive. ↗' and 'By Progressive Insurance (Advertisement)'.

7

KTVB Staff - Wednesday



St. Luke's Health System filed a lawsuit Wednesday against what they call a "coordinated campaign of harassment and intimidation" against its employees over a March protest at the downtown Boise hospital that prompted a temporary lockdown.



The defendants named in the lawsuit include Ammon Bundy, Diego Rodriguez, Freedom Man Press and other related entities.



St. Luke's says there was a "concerted effort to disrupt" hospital business by trespassing at both the Meridian and Boise hospital campuses and false statements related to a child protective services case. According to the lawsuit, the hospital and its staff were also attacked online attacks rel



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St. Luke's files lawsuit against Ammon Bundy and others, over 'intimidation, disruption'

"It is important for us to stand up to the bullying, intimidation and disruption, and the self-serving and menacing actions of these individuals, for the protection of our employees and patients, and to ensure our ability to serve our community," Chris Roth, president and CEO of St. Luke's Health System, said.

According to the suit, the defendants called on their supporters to protest at St. Luke's Boise, forcing ambulances to divert and the hospital to warn doctors, nurses, and other employees not to enter or leave the building.

"St. Luke's has not been the only target of these individuals and believes that no one should be subject to such abuse. Inaction would signal this type of behavior is acceptable in our community. It is not," Roth said.

In the lawsuit, St. Luke's says its aim is to stop the defendants from their ongoing harassment and to remove the defamatory and false statements they have posted and shared online and on other platforms.

St. Luke's is also seeking no less than \$50,000 in monetary damages, or whatever sum is proven at trial, which the hospital has vowed to donate to Children at Risk Evaluation Service (CARES).

EXHIBIT I

VIDEO FILE

SEE FLASH DRIVE

EXHIBIT J

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NO. _____
FILED
A.M. _____ P.M. _____

JUN 2 2022

PHIL McGRANE, Clerk
By SYDNEY SHOEMATE
DEPUTY

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

**AMENDED COMPLAINT AND DEMAND
FOR JURY TRIAL**

(REDACTED)

St. Luke's Health System, Ltd. ("SLHS"), St. Luke's Regional Medical Center, Ltd. ("SLRMC"), Chris Roth ("Mr. Roth"), Dr. Natasha D. Erickson ("Dr. Erickson"), and Tracy W. Jungman, NP ("NP Jungman"), collectively "St. Luke's Parties" or "Plaintiffs," by and through their counsel, Holland & Hart, LLP, hereby bring this Complaint against Ammon Bundy ("Bundy"), Ammon Bundy for Governor ("Bundy Campaign"), Diego Rodriguez ("Rodriguez"),

Freedom Man Press LLC (“FMP”), Freedom Man PAC (“FM PAC”), and the People’s Rights Network (“PRN”), collectively “Defendants,” and allege as follows:

NATURE OF THE CASE

1. Seeking to benefit financially and to enhance their standing among their followers, Bundy (a candidate for Governor and founder of the activist People’s Rights Network) and Rodriguez (an aspiring political and religious figure and consultant for the Bundy Campaign) acted in concert with the other Defendants to launch a knowingly dishonest and baseless smear campaign that claimed Idaho State employees, the judiciary, the police, primary care providers, and the St. Luke’s Parties engaged in widespread kidnapping, trafficking, and killing of Idaho children.

2. In furtherance of their campaign, Defendants used slick marketing tactics and disinformation to launch a coordinated attack of defamation and organized business disruption against the St. Luke’s Parties. Defendants made no effort to conceal their improper objectives. Indeed, they publicly declared that they wanted to subject the St. Luke’s Parties to unrelenting public shaming that would cause reputational damage and humiliation of such intensity that SLHS and SLRMC would be run out of business and Mr. Roth, CEO of SLHS, Dr. Erickson, a St. Luke’s pediatric physician, and NP Jungman, a St. Luke’s nurse practitioner, would lose their careers and be shunned by their friends, colleagues, neighbors, spouses, and children.

3. As a premise for their wrongful actions, Defendants mischaracterized the Idaho Department of Health and Welfare’s (“DHW”) decision to intervene to ensure the health and safety of [REDACTED] Bundy, Rodriguez, and the other Defendants falsely claimed that DHW’s intervention was wholly without basis and was an example of the widespread government conspiracy of kidnapping, trafficking, and killing of children for financial gain.

4. Defendants falsely stated that the St. Luke's Parties were participants in this nefarious organized ring and had participated in the kidnapping and mistreatment of the Infant. Among other things, Defendants falsely stated that (1) the St. Luke's Parties initiated and caused the State's intervention relating to the Infant, (2) the Infant had no need for medical care from the St. Luke's Parties, (3) the St. Luke's Parties provided unnecessary and improper medical treatment to drive up medical bills for the Infant's parents, (4) the St. Luke's Parties harmed the Infant, and (5) the St. Luke's Parties had the authority to release the Infant but were illegally refusing to do so. The Defendants made these false statements and others relating to the St. Luke's Parties while knowing the statements to be without factual basis or recklessly disregarding the truth.

5. Bundy and Rodriguez coordinated the wrongful attacks to further a number of improper objectives, including (1) to harm the St. Luke's Parties, (2) to subvert the authority and rulings of the judiciary through harassment, (3) to mislead and manipulate their followers, (4) to enhance their political reputations and personal brands, (5) to grow membership in the PRN, (6) to drive traffic to Defendants' websites, and (7) to benefit themselves financially through financial contributions to the Bundy Campaign, Rodriguez's political action committee (FM PAC), the PRN, and a charity benefitting Rodriguez's family.

6. The St. Luke's Parties bring this lawsuit to protect patients and staff from further harm and harassment and to ensure that political bullying does not prevent St. Luke's from furthering its mission to improve the health of people in the communities it serves.

PARTIES, VENUE, AND JURISDICTION

7. At all times relevant hereto, Plaintiff SLHS was and is a not-for-profit corporation doing business in Idaho with its principal places of business in Ada County, Idaho.

8. At all times relevant hereto, Plaintiff SLRMC was and is a not-for-profit corporation doing business in Idaho with its principal places of business in Ada County, Idaho.

9. At all times relevant hereto, Plaintiff Mr. Roth was and is President and CEO of SLHS and a resident of Idaho.

10. At all times relevant hereto, Plaintiff Dr. Erickson was and is a physician specializing in pediatric medicine. She is an employee of SLRMC and a resident of Idaho.

11. At all times relevant hereto, Plaintiff NP Jungman was and is a nurse practitioner specializing in pediatrics. She is an employee of SLRMC and a resident of Idaho.

12. At all times relevant hereto, Defendant Ammon Bundy was and is a resident of Idaho. Bundy controls the Bundy Campaign and is the founder and leader of the PRN. Through his control of the PRN, Bundy effectively controls PRN's website, peoplesrights.org.

13. At all times relevant hereto, Defendant Bundy Campaign was and is an Idaho political organization formed for the purpose of raising money to support Bundy's effort to become Governor of Idaho. Aaron Welling is the treasurer for the Bundy Campaign.

14. At all times relevant hereto, Defendant Rodriguez was a resident of Idaho. Rodriguez represents himself as a world-renowned marketing consultant, motivational speaker, religious leader, author, and political activist. On information and belief, Rodriguez is a leader in the PRN, serves as a consultant to the Bundy Campaign, controls the FMP and the FM PAC, and writes political attack columns for FMP under the alias "Gunner Steele." Rodriguez receives money from the Bundy Campaign through one of his business entities, Power Marketing.

15. At all times relevant hereto, and based on information on freedomman.org, Defendant FMP is a limited liability company which owns and controls freedomman.org, a website that specializes in political attacks and advocates for the harassment of political

opponents through “doxing.” FMP is not registered as an LLC in Idaho or registered to do business in Idaho. On information and belief, FMP and its website are controlled by Rodriguez.

16. At all times relevant hereto, FM PAC is and was an Idaho registered political action committee formed by and controlled by Rodriguez. FM PAC works in coordination with FMP and is promoted on freedomman.org.

17. At all times relevant hereto, the PRN is an association of over 50,000 members which owns and operates the peoplesrights.org website. PRN markets itself as a network designed to defeat “government criminals” who seek to take away rights and freedoms. On information and belief, Defendant Ammon Bundy founded and controls the PRN. On information and belief, at all times relevant hereto, PRN is controlled through Bundy’s operations in Emmett, Idaho.

18. This Court has subject matter jurisdiction pursuant to Idaho Code § 1-705 and personal jurisdiction over the Defendants pursuant to Idaho Code § 5-514.

19. Venue is proper in this District pursuant to Idaho Code §§ 5-401 and 5-404.

GENERAL ALLEGATIONS

Role of the Idaho Department of Health and Welfare in Child Welfare

20. Idaho’s laws regarding child safety are primarily administered and implemented by DHW.

21. Idaho law imposes mandatory reporting requirements on Idaho residents to report concerns about a child’s safety.

22. When a report is filed regarding child safety, DHW assesses the severity of the case. In high-danger cases, a social worker and possibly police visit the family to check on the child. Based on the visit and in consultation with the social or healthcare workers, police decide

whether to declare the child in imminent danger. If the child is in imminent danger, police may place the child in temporary custody with DHW until a hearing can be held.

The Role of St. Luke's in Child Health

23. SLHS is the only Idaho-based not-for-profit health care system. SLRMC, a wholly owned subsidiary of SLHS, operates hospitals in Boise ("St. Luke's Boise") and Meridian ("St. Luke's Meridian"). SLHS and SLRMC share the same mission: to improve the health of people in the communities they serve.

24. The St. Luke's Parties are subject to State and Federal law. If a child is determined to be in imminent danger because of health issues and is transported to a St. Luke's hospital, the St. Luke's Parties will care for the child. However, SLHS and SLRMC are not agents of DHW or any other State of Idaho department. Mr. Roth is an employee of SLHS, and Dr. Erickson and NP Jungman are employees of SLRMC. They take no direction from DHW or any other State department.

St. Luke's Care for the Infant

25. On March 1, 2022, the parents took the Infant to the St. Luke's Boise emergency room (ER) because the Infant had reportedly been [REDACTED] and had [REDACTED]
[REDACTED]

26. A St. Luke's ER provider treated the Infant for [REDACTED]. Then, in consultation with the on-call pediatric specialist, Plaintiff Dr. Natasha Erickson, the ER provider admitted the Infant. The parents agreed to admission.

27. Upon admission, St. Luke's began to treat the Infant with [REDACTED]
[REDACTED]. On March 2, 2022, a St. Luke's dietician diagnosed [REDACTED]
[REDACTED]

[REDACTED].
Due to this [REDACTED], the dietician and Dr. Erickson agreed on a plan to feed the Infant [REDACTED].

28. The Infant continued to struggle with oral feeding. Nevertheless, the parents repeatedly sought to take the Infant home early despite the risk to the Infant.

29. On March 3, 2022, Dr. Erickson met with the Infant's parents, and explained that [REDACTED].
[REDACTED].
[REDACTED]. The parents agreed to let the Infant stay at St. Luke's for another day.

30. On March 4, 2022, the Infant's [REDACTED]. Although Dr. Erickson recommended [REDACTED].
[REDACTED]. Dr. Erickson agreed to discharge the Infant at the parent's request with [REDACTED].
[REDACTED]. Dr. Erickson explained that the Infant [REDACTED].
[REDACTED].

31. The parents were with the Infant throughout the Infant's hospitalization. They consented to all care at St. Luke's Boise Medical Center.

32. Neither Dr. Erickson nor any St. Luke's employee-initiated contact with child welfare or any other division of DHW regarding the Infant's hospitalization.

The Infant's Parents Fail to Attend Follow-Up Appointments

33. Following discharge, St. Luke's tried to arrange a visit at the Infant's home on March 5 and March 6, 2022. However, the Infant's parents did not return their phone calls.

34. On information and belief, on March 7, 2022, the Infant's parents attended a follow-up appointment with the Infant's new primary care provider (PCP), who is not affiliated with St. Luke's. The appointment revealed the Infant [REDACTED]. A follow up appointment was scheduled for March 10, 2022.

35. On information and belief, the parents attended the March 10, 2022, appointment. Again, the appointment revealed the Infant [REDACTED]. The PCP asked the Infant's parents to bring the Infant back for a [REDACTED] on March 11, 2022.

36. On information and belief, the Infant's parents failed to bring the Infant to the scheduled [REDACTED] on the morning of March 11, 2022. When the family failed to appear for the [REDACTED], on information and belief, the Infant's PCP referred the situation to DHW.

37. On information and belief, after hearing from the PCP, DHW determined that the Infant was in immediate danger involving a life threatening and/or emergency situation. DHW notified the Meridian Police Department in accordance with DHW's standard practice. On information and belief, the Meridian PD began trying to locate the Infant.

38. Later on March 11, 2022, DHW reached out to NP Jungman, a nurse practitioner at St. Luke's CARES (Children at Risk Evaluation Services). The DHW safety assessor asked NP Jungman for a consult on the Infant's Priority I referral. NP Jungman reviewed the medical records from the Infant's initial admission, the Priority I referral, and the additional information provided from DHW, and advised DHW and the Meridian PD that the Infant be brought in for evaluation on March 11, 2022. She told DHW and the Meridian PD that if the family wanted to bring the Infant to St. Luke's CARES voluntarily, she would stay late that afternoon to save the family another visit to the ER. NP Jungman did not medically diagnose the Infant.

39. On information and belief, the Meridian PD continued to try and get a response from the parents and tried to locate the Infant.

40. That afternoon, DHW spoke by phone to the Infant's father, who said that the Infant and the Infant's mother were sleeping, but that they would come to CARES when they woke up. Despite the representation from the Infant's father, the Infant was not brought to CARES.

Police Take Custody of the Infant

41. On information and belief, later on March 11, 2022, Meridian police went to the family's residence to check on the Infant's safety. On information and belief, the family refused to cooperate, provide information, or let the officers see the Infant, forcing the police to get a warrant.

42. Defendant Rodriguez stated he was present when the police visited the residence and was aware, at least by the time of the visit, that the police were looking for the Infant out of concern for the Infant's health.

43. On information and belief, Rodriguez took no steps to assist the police in obtaining information regarding the Infant.

44. On information and belief, when the police left the house to get a warrant, the Infant and the Infant's parents moved to another location.

45. Believing the Infant was at risk of imminent harm due to the Infant's [REDACTED], the parents' failure to follow medical advice, and the family's refusal to provide the police with information, the Meridian PD alerted its officers that the Infant was in danger and instructed them to look for the parents' vehicle.

46. On information and belief, the police located the Infant and the Infant's parents late on the night of March 11, 2022, in Garden City. When the Infant's parents refused to cooperate, the police took custody of the Infant and transported the Infant to St. Luke's Meridian in an ambulance.

47. At the time the Infant was taken into custody, the parents were informed that there would be a court hearing within 48 hours and that the ultimate objectives were to assure the safety of the Infant and keep the family unit intact.

The Infant [REDACTED] at St. Luke's Boise

48. In the early hours of Saturday, March 12, 2022, providers at St. Luke's Meridian evaluated the Infant and quickly decided to transfer the Infant to the pediatric floor of the St. Luke's Boise Medical Center for [REDACTED].

49. When the ten-month-old Infant was admitted to St. Luke's in Boise for a second time, the Infant [REDACTED]. The Infant had [REDACTED] [REDACTED] eight days earlier. The Infant's [REDACTED] [REDACTED]. The Infant's [REDACTED]. The Infant's [REDACTED]. The Infant had [REDACTED]. The Infant's [REDACTED] from March 4 to March 11, 2022.

50. Once again, St. Luke's [REDACTED] [REDACTED]. The Infant's [REDACTED]. The Infant began [REDACTED].

51. St. Luke's providers gave the Infant's parents detailed updates on the Infant's [REDACTED] But despite the Infant's [REDACTED], the parents refused to

provide medical information, including birth records, newborn screening, and prior medical records. The Infant's parents stated that they were withholding the medical information on advice from their attorney.

52. St. Luke's updated the Infant's parents on the Infant's status throughout the Infant's treatment. The Infant's parents consented to the Infant's treatment plan.

53. Contrary to Defendants' statements, St. Luke's did not vaccinate the Infant against the wishes of the parents. The St. Luke's Parties did not "harm [the Infant] in irreparable ways." Nor did they "abuse" the Infant. As explained below, such statements were false and were intended to attract media attention, incite followers, collect donations, disrupt hospital operations, and defame the St. Luke's Parties.

The Infant is Discharged and Returned to His Family

54. Once again, the Infant's [REDACTED]
[REDACTED]. On March 15, 2022, St. Luke's discharged the Infant as the Infant was [REDACTED], and healthy enough for outpatient care. St. Luke's decision to discharge the Infant was purely based on the Infant's medical condition, not the ongoing protests, pressure, or threats from Defendants or their followers discussed below.

55. The court proceedings relating to the Infant are confidential.

56. St. Luke's discharged the Infant to DHW, which in turn released the Infant to his parents on March 18, 2022.

Defendants Create a False Narrative

57. As alleged above, St. Luke's doctors treated the Infant's [REDACTED]
[REDACTED]. The Infant was returned to the parents. DHW acted to ensure the

safety of the Infant and pursued the goal of returning the Infant to the parents. The confidential court proceedings provided for by statute occurred.

58. Nevertheless, Bundy, Rodriguez, and the other Defendants chose to exploit the events surrounding DHS's intervention and the Infant's care.

59. Defendants' prestige, political influence, personal brands, and revenue all depend on Defendants' ability to market themselves as leaders in the fight against governmental overreach.

60. Defendants perceived the events surrounding DHW's intervention as an opportunity to spread their lies and further their agendas. They realized that the facts surrounding DHW's intervention could be mischaracterized as a governmental conspiracy to kidnap, traffic, and kill children. Then, in turn, Defendants realized they could establish themselves as crusaders against their falsely manufactured governmental conspiracy.

61. To that end, Defendants worked together to manufacture a false narrative of a state-sponsored child kidnapping and trafficking ring that included DHW, the police, the Idaho Judiciary, the Infant's PCP, and the St. Luke's Parties.

62. In support of their wrongful objectives, Defendants defamed the supposed members of the kidnapping and child trafficking ring and then incited their followers by stating that countless children, like the Infant, would be kidnapped, trafficked, and potentially killed unless immediate action was taken to destroy the St. Luke's Parties and others.

63. Defendants acted in concert to disseminate this false narrative. Evidence indicates that Bundy, Rodriguez, and the other Defendants coordinated talking points and the timing of demonstrations and provided the same directions to followers regarding how to disrupt the St. Luke's Parties. They told their followers to target the same individuals for doxing and

harassment. Defendants mirrored false statements across the websites and social media they controlled.

64. Defendants operated as a single enterprise to defame and harm the St. Luke's Parties and others.

Defendants Knowingly Harmed the St. Luke's Parties

65. Defendants were aware of the likely impact of their joint actions. When they developed their plan, Bundy, Rodriguez, and the other Defendants knew that spreading their false claims would result in damage to the St. Luke's Parties, including death threats, business interruption, trespass, reputational damage, menacing crowds, and potentially mob violence.

66. Despite foreseeing the consequences, Bundy, Rodriguez, and the other Defendants acted to maximize harm and damage. As Rodriguez bragged publicly, Defendants wanted to harass and shame the St. Luke's Parties with claims of child kidnapping and murder such that St. Luke's employees would be shunned by their families and lose their careers, while St. Luke's itself would be run out of business.

67. Bundy, Rodriguez, and the other Defendants knew that a legal process existed to address the custody and welfare of the Infant.

68. Defendants knew their harassment would not deter those targeted from doing what was best for the Infant. They knew that the judge would not be cowed into changing how she would rule in the case. They knew that DHW would not act contrary to what it believed was in the best interest of the Infant. They knew the St. Luke's Parties would not discharge the Infant until the Infant was medically ready for discharge. And they knew the St. Luke's Parties did not have the authority to determine whether the Infant would be discharged home or to a foster family.

69. Despite knowing that DHW, the trial court, and the St. Luke's Parties would not be threatened into abandoning the law or the Infant's best interests, Defendants engaged in their coordinated false statements and wrongful acts. Defendants did so because their wrongful acts were motivated by other goals.

70. The facts and circumstances indicate that Defendants' motives in creating and disseminating the false kidnapping and child trafficking narrative included, but are not limited to: (1) generating interest in the Bundy Campaign; (2) raising the political profiles and personal brands of Bundy and Rodriguez, especially within the People's Rights Network and other political groups; (3) driving web traffic to sites controlled by Defendants; (4) solidifying control over their followers; and (5) creating financial gain in the form of donations to Bundy's campaign, Rodriguez's PAC, and a fund that was established for Rodriguez's family.

False Narrative Regarding DHW's Intervention

71. Understanding the need to create a narrative that served a larger conspiracy theory, Rodriguez misrepresented the circumstances that led to DHW's intervention regarding the Infant. Among other things, Rodriguez, with assistance from the other Defendants, falsely asserted that the Infant was not at risk and had a "100% clean bill of health" when taken into custody, that the parents had only missed a single medical appointment, and that Dr. Erickson had reported the parents and the Infant to DHW.

72. In truth, Rodriguez knew or should have known that the Infant was [REDACTED] and faced significant [REDACTED]. Rodriguez knew the parents had failed to follow several steps needed to ensure the Infant was receiving needed medical care and failed to respond to those properly seeking information regarding the health of the Infant. Rodriguez further understood

that he had no factual basis to assert that Dr. Erickson had contacted DHW. Dr. Erickson never contacted DHW regarding the Infant.

Bundy Trespasses at St. Luke's Meridian to Generate Publicity and Contributions

73. Bundy has a history of forcing confrontation with police to generate publicity for himself and his political agenda.

74. Shortly after the police took the Infant into custody, Bundy was made aware and took action to garner publicity.

75. When Bundy learned that police had transported the Infant to St. Luke's in Meridian, Bundy and a group of his followers travelled to the hospital for the purpose of initiating a conflict with the police and potentially getting arrested. He knew that by orchestrating a protest and arrest at the hospital that he would win media attention, enhance his brand, and likely generate financial contributions for himself and the Bundy Campaign.

76. On Saturday, March 12, 2022, at around 1:30 a.m., Bundy and his followers entered the ambulance bay at St. Luke's in Meridian—a primary access point for medical emergencies. Once there, the group yelled and cursed at hospital staff and uniformed police officers. Bundy's followers were prepared with their cameras and immediately shared the confrontation on social media.

77. St. Luke's security guards recognized Bundy, based on his actions and direction of the crowd, as “the catalyst and aggressor in the group.”

78. Hospital staff explained to Bundy and his followers that the group was blocking emergency access to the ambulance bay and asked them to move to a nearby area where they would not block patient access. Following Bundy's lead, the group refused to move and continued to harass hospital staff.

79. Hospital staff told Bundy and his followers that they would be trespassing if they stayed in the ambulance bay. Once again, the group refused to leave.

80. Recognizing that Bundy's followers were growing more numerous and menacing, a hospital supervisor tried to reason with Bundy and deescalate the situation. For the benefit of those there to film him, Bundy responded by accusing the supervisor of kidnapping and then demanded that he give Bundy the Infant. Bundy knew full well he had no legal authority to make that demand because he had no parental rights over the Infant.

81. Bundy knew that St. Luke's would not and could not as a matter of law release the Infant into Bundy's custody.

82. Hospital staff repeatedly warned Bundy and his followers to clear the ambulance bay. Bundy heard and refused to heed the warnings on at least three occasions.

83. Bundy knew the police had no option but to arrest him for trespass. As he intended, the police arrested him just before 2:00 a.m. on March 12, 2022.

84. Bundy's followers recorded his arrest for social media and then dispersed.

85. The police released Bundy a few hours after his trespass.

86. Upon his release, Bundy immediately began to publicize his arrest. In accordance with the messaging campaign developed by Rodriguez (a paid marketing consultant for the Bundy Campaign), Bundy mischaracterized the Infant as having been in good health, falsely stated the Infant had been kidnapped from his parents because a single appointment was missed, indicated the Infant's health was at risk in the hospital, falsely stated that he had been arrested for trespass without warning and justification, and directed his followers to the freedomman.org website which already contained messaging supporting the false kidnapping and child trafficking narrative.

87. Shortly thereafter, the Bundy Campaign and PRN likewise began to publish the same false narrative regarding the Infant's care at St. Luke's and regarding Bundy's arrest at St. Luke's in Meridian.

Concerted Effort to Disrupt St. Luke's Business

88. To further their false narrative, Defendants made false statements regarding the Infants' care and repeatedly defamed the St. Luke's Parties. In addition, Defendants repeatedly told their followers that the St. Luke's Parties need to be punished and directed their followers on how to shame the St. Luke's Parties and disrupt St. Luke's operations.

89. Defendants incited their followers by publishing patently untrue statements and providing direction to cause harm, including stating the following:

- a. St. Luke's Parties were running a child trafficking ring subsidized by tax dollars;
- b. St. Luke's Parties were abusing and harming the Infant in irreparable ways;
- c. St. Luke's Parties harmed and killed babies all the time;
- d. St. Luke's Parties kidnapped the Infant and other children;
- e. St. Luke's Parties were "moronic imbeciles" who neglected the Infant;
- f. St. Luke's Parties stole the Infant;
- g. St. Luke's changed the Infant into someone who was unrecognizable, lethargic, and unresponsive;
- h. St. Luke's failed to keep the Infant clean;
- i. St. Luke's caused the Infant "suspicious" bruising;
- j. St. Luke's lied about the Infant's treatment;
- k. St. Luke's Parties vaccinated the Infant against the family's wishes;
- l. St. Luke's Parties were "medically negligent";

m. St. Luke's was "world famous" for "mistreating people," "killing people," and "stealing babies from their parents";

n. St. Luke's forced the Infant to take "toxic poison" which was then allowed to stay in the Infant's body for days;

o. St. Luke's Parties changed and falsified information in the medical records to protect themselves;

p. Mr. Roth was guilty of criminal accessory of child abduction and deprivation of rights under color of law;

q. Mr. Roth personally profited from the pandemic;

r. Dr. Erickson was responsible for the Infant's kidnapping;

s. Dr. Erickson participated in kidnapping "hundreds of children" with the help of a judge;

t. The Infant "possibly could lose his life because of the decisions of people [at St. Luke's] who don't even care" about the Infant;

u. The hospital made the Infant "more sickly";

v. Followers should put "physical pressure" on those "that are causing the problem";

w. Followers should disrupt St. Luke's operations by protesting, calling in, donating money, making noise, and giving the hospital "hell";

x. God should "crush the necks of those that are evil."

90. Defendants caused disruption to St. Luke's operations, harmed staff and patients, and impaired patient care inside the hospital.

91. Between March 12 and March 17, 2022, Defendants Bundy and Rodriguez called on their followers to protest at St. Luke's in Boise. In response, crowds, many of whom carried firearms, began to join Bundy and Rodriguez at the hospital in a concerted effort to disrupt the hospital's operations.

92. Rodriguez became a daily presence at the hospital. Rodriguez conducted defamatory "press conferences" outside the St. Luke's Boise hospital.

93. Incited by Defendants, the crowd of followers harassed patients and staff, and disrupted patient care. Patients reported feeling anxious and fearful because of Defendants' noisy and menacing protests.

94. On March 15, 2022, Defendants went so far as to cause St. Luke's to go into lockdown for more than an hour. During this time, nurses, doctors, and other employees could not enter or exit the building. St. Luke's directed patients to other facilities and rerouted ambulances to other sites.

95. Defendants also organized a campaign of technological disruption. They encouraged their followers to flood St. Luke's phone lines and email inboxes in an effort to shut down St. Luke's operations. Defendants' followers jammed phone lines with menacing calls (including death threats), sent threatening emails, and sent spam emails to disrupt servers.

Solicitations for Donations to Rodriguez's Family

96. Concurrently while acting to harm the St. Luke's Parties, Rodriguez, with help from the other Defendants, solicited money based on false representations relating to the Infant, the circumstances leading to DHW's intervention, the parents' financial condition, and the St. Luke's Parties.

97. A center piece in almost every one of Rodriguez's media appearances was a solicitation for donations to his family members, the parents of the Infant. Likewise, the solicitation for donations was advertised on peoplesrights.org and freedomman.org.

98. These solicitations for charitable contributions were made based on the defamatory statements about the St. Luke's Parties and others kidnapping, trafficking, and killing children.

99. The solicitations were also premised on false statements regarding the parents' liability for the medical care provided by SLHS, SLRMC, and Dr. Erickson. Rodriguez repeatedly stated that the St. Luke's Parties were performing unnecessary medical tests and treatments on the Infant, unnecessarily extending the Infant's time at the hospital to increase costs, and extorting the Infant's parents. These statements were false.

100. As Rodriguez knew or recklessly failed to learn, the parents did not have significant financial liability relating to the Infant's care. While the Infant's [REDACTED] [REDACTED] and the parents were uninsured, governmental assistance and St. Luke's policies alleviated any significant financial burden.

101. While the Infant was [REDACTED], the Infant's parents were made aware that significant costs were being covered by government assistance. St. Luke's also took steps to assist the parents in minimizing the financial impact of the healthcare provided to the Infant. For example, when the Infant's parents expressed concerns about paying for the hospital stay during the Infant's first admission, a St. Luke's employee screened the family and informed them that they likely qualified for Medicaid assistance.

102. A patient care coordinator passed their concerns along to a patient financial advocate (PFA), and the PFA spoke with the Infant's mother on March 2, 2022, to discuss financial assistance options. The PFA screened the family for Medicaid and advised the Infant's mother that, given their reported family income, the Infant qualified for Children's Health Insurance Plan (CHIP) under Medicaid. The employee later tried to call the Infant's parents on March 3, 2022, and March 8, 2022, to offer further assistance, but the parents did not answer or return the calls.

103. St. Luke's currently estimates that Medicaid will cover the Infant's medical bills for both ER visits and admissions. Despite absence of insurance, the Infant's family is unlikely to have any outstanding balance due to St. Luke's.

104. Despite knowing that the Infant's parents had not incurred significant liability for the medical care received at SLRMC, Rodriguez, assisted by the other Defendants, continued to solicit donations, and received more than \$115,000 based on misrepresentations that the St. Luke's Parties had engaged in wrongdoing and that St. Luke's had created huge financial liability for Rodriguez's family.

Defendants Continue to Defame and Call for Harassment

105. Defendants' efforts to disrupt and dismantle St. Luke's and defame Plaintiffs did not stop when the Infant was discharged.

106. Seeking to continue to benefit politically and financially from the false conspiracy Defendants manufactured, Rodriguez recently created the group "People Against Child Trafficking."

107. On March 26, 2022, Bundy and Rodriguez organized a rally on property owned by one of Bundy's companies.

108. The rally was heavily advertised by Defendants and was exploited as a fundraising event by the Bundy Campaign.

109. During the March 26, 2022, rally, Defendants continued to make false, defamatory statements about the St. Luke's parties, including the following:

a. Defendant Rodriguez stated Dr. Erickson kept the Infant in the hospital to "rack[] up the bill" while displaying defamatory images of Dr. Erickson on a large movie screen;

b. Defendant Rodriguez stated the St. Luke's Parties engaged in kidnapping and child trafficking for money;

c. Defendant Rodriguez indicated that the St. Luke's Parties were taking part in the "greatest child trafficking ring in the history of the world"; and

d. Defendant Bundy described the St. Luke's Parties as equivalent to rapists, comparing the St. Luke's Parties to "feudal lords" practicing "primae noctis";¹

110. At the March 26, 2022, rally on the Bundy Property, Rodriguez bragged about shutting down St. Luke's phones system such that St. Luke's "couldn't even operate."

111. At the March 26, 2022, rally, Defendants used defamatory speech to incite people to join PRN and to take the fight against the St. Luke's Parties and other supposed kidnapers and child traffickers "all the way to the end."

112. The defamatory statements made at the March 26, 2022, rally were streamed and the video was later posted to social media sites and to websites controlled by Defendants.

**COUNT I
(DEFAMATION (LIBEL AND SLANDER)—
ALL PLAINTIFFS AGAINST ALL DEFENDANTS)**

113. Plaintiffs incorporate the foregoing allegations as if fully set forth herein.

114. Defendants have published false, misleading, and defamatory statements about Plaintiffs directed to third parties including, but not limited to:

a. Defendant Rodriguez falsely and publicly accused St. Luke's of being "world famous" for "mistreating people," "killing people," and "stealing babies from their parents."

b. Defendant Rodriguez falsely and publicly accused St. Luke's of forcing the Infant to take "toxic poison."

c. Defendant Rodriguez falsely and publicly accused Plaintiffs of participating in an "organized crime ring" and "harming" the Infant.

¹ Primae Noctis names an ancient tradition in which all noble lords had the right to have sex with any female subject, regardless of her will, and even with a virgin bride on her wedding night. <https://www.dictionary.com/e/historical-current-events/primae-noctis/#:~:text=Prima%20nocta%20is%20the%20semi,particularly%20on%20her%20wedding%20night.>

d. Defendants falsely and publicly accused Plaintiffs of kidnapping children.

e. Defendants repeatedly told their followers and supporters to disrupt St. Luke's operations by protesting, calling in, donating money, and making noise. Followers heeded these commands, resulting in serious threats to Plaintiffs.

f. Defendant PRN published a wanted poster featuring a headshot of Mr. Roth with the caption: "WANTED: Chris Roth, President/CEO of St. Luke's." Under the headshot, the website falsely accused Mr. Roth of "Criminal accessory of child abduction and deprivation of rights under color of law." Defendants encouraged protestors to make signs using this image.

g. Defendant FMP published a list of pictures under the heading: "Main People Responsible for [REDACTED] Kidnapping." Dr. Erickson's picture was the first on the list. FMP then falsely stated that Dr. Erickson "was the first to call CPS" and accused her of being "the initial trigger that got everything started." FMP later added NP Jungman to the list.

h. Defendant Rodriguez falsely and publicly stated that Dr. Erickson "had a panic attack and literally sent a CPS worker or social worker to [Rodriguez's] daughter's hospital room to interview her."

i. Defendant Rodriguez falsely and publicly stated that Dr. Erickson is incompetent at her profession, stating the "hospital doesn't understand even the basic common-sense things that anybody understands."

j. Defendants FMP and Rodriguez published the false statement that experts at St. Luke's "harm and kill babies all the time." This false accusation is intended to defame doctors at St. Luke's including Dr. Erickson.

k. Defendant Bundy falsely and publicly accused Judge Fortier of taking "hundreds of children . . . with this Doctor Natasha D. Erickson."

l. Defendants FMP and Rodriguez published the false statements that NP Jungman "personally financially benefitted from this Child trafficking" and that she "takes innocent little children that have just been ripped from their families and starts looking at and asking them about their privates."

m. Defendants FMP and Rodriguez published a false statement implying that NP Jungman committed "medical malpractice."

115. These statements were false.

116. At the time Defendants made the statements, they knew the statements were false, or made the statements with reckless disregard for their truth and made such statements with malice.

117. Defendants' statements were not subject to privilege or justified communications.

118. Defendants made or published the statements with the purpose of defaming or disparaging Plaintiffs, in an effort to injure Plaintiffs' business and reputation.

119. Defendants' statements involve false allegations of criminal activity and/or involve matters incompatible with business, trade, profession, or office, and are defamatory *per se*.

120. As a direct and proximate result of Defendants' publication of such statements, Plaintiffs have suffered economic and non-economic harm in an amount to be proven at trial.

121. Because Defendants' statements were made knowingly, intentionally, willfully, and/or maliciously, Plaintiffs reserve the right to seek an amendment to add a request for punitive damages in an amount to be proven at trial.

COUNT II
(INVASION OF PRIVACY—MR. ROTH, DR. ERICKSON, AND NP JUNGMAN
AGAINST ALL DEFENDANTS)

122. Plaintiffs Mr. Roth, Dr. Erickson, and NP Jungman incorporate the foregoing allegations as if fully set forth herein.

123. Through their actions described above, Defendants have published materially false statements concerning Mr. Roth, Dr. Erickson, and NP Jungman to third parties.

124. These statements were false.

125. These statements placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye.

126. At the time Defendants made the statements, they knew the statements were false, or made the statements with reckless disregard for their truth and made such statements with malice.

127. Defendants' statements were not subject to privilege or justified communications.

128. As a direct and proximate result of Defendants' publication of such statements, Mr. Roth, Dr. Erickson, and NP Jungman have suffered damages in an amount to be proven at trial.

129. Because Defendants' actions were done knowingly, intentionally, willfully, and/or maliciously, Mr. Roth, Dr. Erickson, and NP Jungman reserve the right to seek an amendment adding a request for punitive damages in an amount to be proven at trial.

COUNT III
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS—
MR. ROTH, DR. ERICKSON, AND NP JUNGMAN AGAINST ALL DEFENDANTS)

130. Plaintiffs Mr. Roth, Dr. Erickson, and NP Jungman incorporate the foregoing allegations as if fully set forth herein.

131. Through their actions described above, Defendants engaged in extreme and outrageous conduct that went beyond all possible bounds of decency in a civilized society.

132. Defendants' conduct was intentional or reckless.

133. As an actual or proximate result of Defendants' wrongful conduct, Mr. Roth, Dr. Erickson, and NP Jungman suffered the requisite injuries.

134. As a direct and proximate result of Defendants' wrongful conduct, Mr. Roth, Dr. Erickson, and NP Jungman have suffered damages in an amount to be proven at trial.

135. Because Defendants' actions were done knowingly, intentionally, willfully, and/or maliciously, Mr. Roth, Dr. Erickson, and NP Jungman reserve the right to seek an amendment adding a request for punitive damages in an amount to be proven at trial.

COUNT IV
(TRESPASS-SLHS AND SLMRC AGAINST BUNDY AND RODRIGUEZ)
(COMMON LAW)

136. Plaintiffs SLHS and SLRMC incorporate the foregoing allegations as if set forth fully herein.

137. Defendant Bundy entered the ambulance bay at St. Luke's Meridian property on Saturday, March 12, 2022.

138. Defendant Bundy did not have permission to be in the ambulance bay at St. Luke's Meridian property.

139. Defendant Bundy remained in the ambulance bay at St. Luke's Meridian property after being instructed to leave and blocked access to the ambulance bay.

140. The ambulance bay at St. Luke's Meridian property is restricted to authorized medical and emergency personnel.

141. Defendant Bundy's presence in the ambulance bay at St. Luke's Meridian property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

142. Defendants Bundy and Rodriguez entered St. Luke's Boise property on Tuesday, March 15, 2022, while leading a large crowd for the express purpose of disrupting hospital operations and generate publicity for a political cause.

143. Defendants Bundy and Rodriguez did not have permission to enter or remain on St. Luke's Boise property because they were not seeking medical care or treatment and were not authorized visitors.

144. Defendants Bundy and Rodriguez interfered with hospital staff, blocked public access to the hospital, and disrupted hospital operations.

145. Defendants Bundy's and Rodriguez's presence at St. Luke's Boise property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

146. As a direct and proximate result of Defendants Bundy's and Rodriguez's actions, Plaintiff St. Luke's has suffered damages in an amount to be proven at trial.

COUNT V
(TRESPASS-SLHS AND SLRMC AGAINST BUNDY AND RODRIGUEZ)
(STATUTORY TRESPASS PURSUANT TO I.C. § 6-202)

147. Plaintiffs SLHS and SLRMC incorporate the foregoing allegations as if set forth fully herein.

148. Defendant Bundy entered the ambulance bay at St. Luke's Meridian property on Saturday, March 12, 2022.

149. Defendant Bundy did not have permission to be in the ambulance bay at St. Luke's Meridian property.

150. Defendant Bundy acted intentionally and willfully when he entered and remained in the ambulance bay at St. Luke's Meridian property.

151. Defendant Bundy remained in the ambulance bay at St. Luke's Meridian property after being instructed to leave and blocked access to the ambulance bay.

152. The ambulance bay at St. Luke's Meridian property is not open to the public and is not accessible by the public. Entry into the ambulance bay is restricted to authorized medical personnel, emergency responders, and patients seeking emergency care.

153. Defendant Bundy's presence in the ambulance bay at St. Luke's Meridian property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

154. Defendants Bundy and Rodriguez entered St. Luke's Boise property on Tuesday, March 15, 2022, as protestors.

155. Defendants Bundy and Rodriguez acted intentionally and willfully when they entered and remained present at St. Luke's Boise property.

156. St. Luke's Boise property is open to the public who are actively seeking medical care or treatment. St. Luke's lawfully restricts access to its Boise property to patients and authorized visitors only.

157. Defendants Bundy and Rodriguez did not have permission to enter or remain on St. Luke's Boise property because they were not seeking medical care or treatment and were not authorized visitors.

158. Defendants Bundy and Rodriguez interfered with hospital staff and patients, blocked public access to the hospital, and disrupted hospital operations.

159. Defendants Bundy's and Rodriguez's presence at St. Luke's Boise property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

160. As a direct and proximate result of Defendants Bundy's and Rodriguez's actions, Plaintiff St. Luke's has suffered damages in an amount to be proven at trial.

**COUNT VI
(UNFAIR BUSINESS PRACTICES—ALL PLAINTIFFS AGAINST DEFENDANTS
BUNDY, RODRIGUEZ, AND FMP)**

161. Plaintiffs incorporate by reference each of the foregoing allegations as if set forth fully herein.

162. Defendants engage in political activism, the marketing of the personal brands of Bundy and Rodriguez, and related business activities for financial gain.

163. On information and belief, Ammon Bundy is in the business of generating revenue for himself, his political campaign, the PRN, and other businesses he owns, such as Abish-Husbandi, Inc., by marketing his personal brand as a political activist and leader to garner donations, revenues, and fees.

164. On information and belief, Rodriguez generates revenue for himself and his businesses through his personal brand, his political activism, the FM PAC, FMP, sale of his self-published books, speaking engagements, and provision of marketing services to the Bundy for Governor Campaign.

165. On information and belief, FMP owns and operates freedomman.org. FMP generates revenue for Rodriguez through traffic to the site and by serving as a marketing vehicle for Rodriguez's business ventures.

166. SLHS and SLRMC are not-for-profit companies which provide medical services in Idaho.

167. Mr. Roth is the CEO and President of SLHS.

168. Dr. Erickson is a physician employed by SLRMC.

169. NP Jungman is a nurse practitioner employed by SLRMC.

170. In the conduct of trade or commerce and in seeking revenue for themselves, Bundy, Rodriguez, and FMP engaged in methods, acts, and practices unlawful under Idaho Code title 48, chapter 6, including, but not limited to, falsely disparaging the business and professional reputation of the St. Luke's Parties.

171. Bundy, Rodriguez, and FMP knew, or in the exercise of due care should have known, that they engaged in unconscionable methods, acts, or practices in the conduct of trade or commerce, as provided in Idaho Code § 48-603C.

172. The actions and practices of Bundy, Rodriguez, and FMP are misleading, false, or deceptive.

173. Bundy's, Rodriguez's, and FMP's conduct and pattern of conduct are outrageous and offensive to the public conscience.

174. As a direct result of these wrongful acts and practices, the St. Luke's Parties have been damaged more than \$10,000.00, in an amount to be proven at trial.

COUNT VII
(IDAHO CHARITABLE SOLICITATION ACT—ALL PLAINTIFFS AGAINST
DEFENDANTS RODRIGUEZ AND FMP)

175. Plaintiffs incorporate by reference each of the foregoing allegations as if set forth fully herein.

176. Defendants Rodriguez and FMP engaged in the solicitation of charitable contributions to the "Save [REDACTED] from Medical Kidnapping" campaign.
[https://givesendgo.com/\[REDACTED\]](https://givesendgo.com/[REDACTED])

177. Defendant Rodriguez and FMP planned, conducted, and executed solicitations for charitable contributions by utilizing unfair, false, deceptive, misleading, or unconscionable acts and practices.

178. In soliciting for charitable contributions, Rodriguez and FMP engaged in methods, acts, and practices unlawful under Idaho Code title 48, chapter 12, including, but not limited to, falsely disparaging the business and professional reputation of the St. Luke's Parties, manufacturing a false conspiracy of kidnapping, trafficking, and killing of children involving the St. Luke's Parties, and falsely representing the amount of liability incurred relating to medical expenses associated with treatment of the Infant.

179. SLHS and SLRMC are not-for-profit companies which provide medical services in Idaho that were disparaged as part of the charitable solicitation.

180. Mr. Roth is the CEO and President of SLHS who was disparaged and part of the charitable solicitation.

181. Dr. Erickson is a physician employed by SLRMC who was disparaged as part of the charitable solicitation.

182. NP Jungman is a nurse practitioner employed by SLRMC who was disparaged as part of the charitable solicitation.

183. Rodriguez and FMP knew, or in the exercise of due care should have known, that they engaged in unconscionable methods, acts, or practices in the conduct of trade or commerce, as provided in Idaho Code § 48-603C, standards incorporated into the Idaho Charitable Solicitations Act.

184. The actions and practices of Rodriguez and FMP relating to the solicitation of the charitable contributions were and continue to be misleading, false, or deceptive.

185. Rodriguez's and FMP's conduct and pattern of conduct are outrageous and offensive to the public conscience.

186. As a direct result of these wrongful acts, Rodriguez and FMP caused more than \$115,000 to be donated wrongfully.

187. As a direct result of these wrongful acts and practices, the St. Luke's Parties have been damaged owing to the false and defamatory statements to generate donations.

188. As a direct result of these wrongful acts and practices, the public has been misled.

189. Rodriguez and FMP should be assessed damages, in an amount proven at trial pursuant to the purpose of the Idaho Charitable Solicitations Act.

**COUNT VIII
(CIVIL CONSPIRACY TO COMMIT DEFAMATION, INVASION OF PRIVACY,
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, TRESPASS, UNFAIR
BUSINESS PRACTICES, AND WRONGFUL CHARITABLE SOLICITATIONS—ALL
PLAINTIFFS AGAINST DEFENDANTS)**

190. Plaintiffs incorporate the foregoing allegations as if fully set forth herein.

191. Defendants each willfully, intentionally, and knowingly agreed and conspired with each other to publish false, misleading, and defamatory statements about Plaintiffs directed to third parties, as described above.

192. Defendants Rodriguez and Bundy further agreed and conspired to unlawfully trespass on Plaintiff St. Luke's property.

193. In furtherance of this conspiracy, Defendants defamed all Plaintiffs, invaded the privacy of Mr. Roth, Dr. Erickson, and NP Jungman, intentionally inflicted emotional distress on Mr. Roth, Dr. Erickson, and NP Jungman, unlawfully trespassed onto Plaintiff St. Luke's property, committed unfair trade practices against all Plaintiffs, and defamed all Plaintiffs in furtherance of a conspiracy to violate the Idaho Charitable Solicitation Act.

194. As a direct and proximate cause of Defendants' wrongful conduct, Plaintiffs have suffered damages in an amount to be proven at trial.

195. By virtue of the formation and operation of this conspiracy, Defendants, as participants in the conspiracy, are liable as joint tortfeasors for each other's misconduct.

REQUEST FOR JURY TRIAL

Pursuant to Idaho Rule of Civil Procedure 38, Plaintiffs hereby request trial by jury as to all issues that are properly so tried.

PRAYER FOR RELIEF

Counterclaimants respectfully request the following relief from this Court:

A. An award to St. Luke's Parties for damages in the sum to be proven at trial but in no event less than \$50,000;

B. Injunctive relief requiring the Defendants to cease posting and disseminating defamatory statements against the St. Luke's Parties;

C. An award to the St. Luke's Parties of their reasonable attorneys' fees and costs for this matter under Idaho Code §§ 12-120(3), 12-121, or other applicable authorities and statutes;
and

D. Provide such other relief as the Court determines fair, just, and appropriate under the circumstances.

DATED this 2nd day of June, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham
Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 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 37
Emmett, ID 83617

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617

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

People's Rights Network
4615 Harvest Ln.
Emmett, ID 83617

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

18998175_v1

EXHIBIT K

**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

**ORDER FOR ENTRY OF DEFAULT
AGAINST
AMMON BUNDY, AMMON BUNDY
FOR GOVERNOR, AND PEOPLE'S
RIGHTS NETWORK**

Upon Plaintiffs' Motion for Entry of Default and Default Judgment, supporting documents, and documents on file as amended, this Court finds:

1. The Complaint in this action was filed on May 11, 2022.
2. The Amended Complaint was filed on June 2, 2022.

**ORDER FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST
AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, AND PEOPLE'S
RIGHTS NETWORK - 1**

3. Defendants Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network (the "Bundy Defendants") were duly served on July 16, 2022 by Tri-County Process Serving and on July 20, 2022 by the Gem County Sheriff's Department. Defendant Ammon Bundy for Governor was served again by Tri-County Process Serving on July 20, 2022.

4. The Bundy Defendants have failed to plead or otherwise defend this action.

IT IS HEREBY ORDERED that the default of the Bundy Defendants be duly entered according to law;

IT IS HEREBY FURTHER ORDERED, as follows:

The Plaintiffs must notice a hearing before the Court to prove it is entitled to any equitable relief and/or damages requested in the Complaint pursuant to Idaho Rule of Civil Procedure 55(b)(2). Contact the in-court clerk to obtain a date for an evidentiary hearing.

DATED 9/2/2022 4:28:48 AM


Lynn Norton
District Judge

**ORDER FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST
AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, AND PEOPLE'S
RIGHTS NETWORK - 2**

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**ORDER FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST
AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, AND PEOPLE'S
RIGHTS NETWORK - 3**

CERTIFICATE OF SERVICE

I hereby certify that on 9/2/2022 9:07:11 AM, I caused to be served 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
Campaign Office
800 E. Locust Street
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:

**ORDER FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST
AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, AND PEOPLE'S
RIGHTS NETWORK - 4**

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
1876 E. Adelaide Dr.
Meridian, ID 83642-9219

- 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:

Diego Rodriguez
1876 E. Adelaide Dr.
Meridian, ID 83642-9219

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

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
E-mail: efstidham@hollandhart.com

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

DATED: 9/2/2022 9:07:33 AM


Clerk of the Court - Deputy



**ORDER FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST
AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, AND PEOPLE'S
RIGHTS NETWORK - 5**

EXHIBIT L



bundy

SEARCH

Yes or No?

Should illegal immigrants receive social security benefit?

Rightwing

Search Results for: bundy

BREAKING NEWS



Senator Scott Herndon, ISAA, et al. and the City of Sandpoint Argue Gun Rights at Idaho

Supreme Court

FEBRUARY 6, 2023



Idaho Supreme Court to Hear 2nd Amendment Case Tomorrow Morning

FEBRUARY 5, 2023



De-Transitioned Teen Chloe Cole Visits the Treasure Valley During Introduction of Controversial

Legislation

FEBRUARY 3, 2023



IDGOP State Party Chair Dorothy Moon to Address Multiple Concerns Regarding Ada County GOP

FEBRUARY 1, 2023



BREAKING NEWS

Ammon Bundy Proposes Plea Deal, Judge Rejects and Orders Trial, but Then New Plea Deal Reached

JANUARY 23, 2023



OP-ED

Op-Ed: Come No More Upon Me, a Warning Letter From Ammon Bundy

JANUARY 18, 2023



BREAKING NEWS

IDAHO LEGISLATURE

POLITICS

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

JANUARY 4, 2023

POLITICS



De-Transitioned Teen Chloe Cole Visits the Treasure Valley During Introduction of Controversial

Legislation

FEBRUARY 3, 2023



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FEBRUARY 1, 2023



Senator Tammy Nichols Unveils 'School Choice' Legislation

JANUARY 24, 2023



Op-Ed: Moon Joins Right-Wing Rant; Governor Yawns

JANUARY 16, 2023

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SEARCH

Critical Race Theory

The meaning and threat of critical race theory. How to defeat it

Imprimis by Hillscale.edu

BREAKING NEWS



Senator Scott Herndon, ISAA, et al. and the City of Sandpoint Argue Gun Rights at Idaho

Supreme Court

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IDGOP State Party Chair Dorothy Moon to Address Multiple Concerns Regarding Ada County GOP

FEBRUARY 1, 2023

PRESS RELEASES



Press Release: Gov. Little Leads Governors in Opposing Biden's EPA Waters Rule

JANUARY 31, 2023



Op-Ed: Come No More Upon Me, a Warning Letter From Ammon Bundy

By Ammon Bundy • January 18, 2023



From: Ammon Bundy

To: Blake Higley; Scott Bedke; Whitney Welsh; Chris Roth; Annie McDevitt; Erik Stidham; Brad Little; Keith Reynolds;

RE: Warning



POLITICS



De-Transitioned Teen Chloe Cole Visits the Treasure Valley During Introduction of Controversial

Legislation

FEBRUARY 3, 2023



IDGOP State Party Chair Dorothy Moon to Address Multiple Concerns Regarding Ada County GOP

FEBRUARY 1, 2023



Senator Tammy Nichols Unveils 'School Choice' Legislation

JANUARY 24, 2023



Op-Ed: Moon Joins Right-Wing Rant; Governor Yawns

JANUARY 16, 2023

OP-EDS

Op-Ed: There is No Silver Bullet to Securing Liberty

BY AMMON BUNDY
 FEBRUARY 1, 2023

Op-Ed From Senator Chris Trahan, Idaho Freedom Caucus Member

Privacy - Terms



Idaho Freedom Caucus in full support of HB2 – NO FUNDS FOR ABORTION ACT

JANUARY 18, 2023

Governor Brad Little
News Release

Press Release: Idahoans Invited to Watch Gov. Brad Little Inauguration and 2023 State of the State

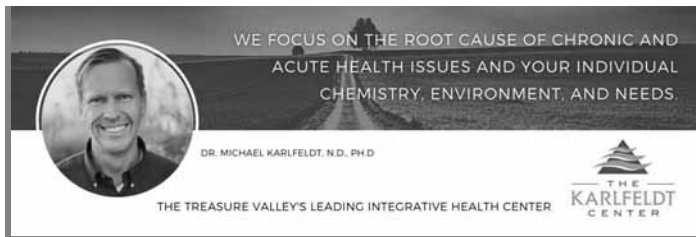
JANUARY 3, 2023

Address



Merry Christmas from Idaho Dispatch!

DECEMBER 24, 2022



I Ammon Bundy respectfully come seeking relief that my family and I may live in peace and not be harassed at your hands anymore.

As much as it pains me to do so, it is my duty to plead my case to you in why I have acted the way I have over the past few years. I pray that you will understand my intentions and see how my actions have been based in love for God and my fellow man, including yourself.

In February of 2020 I made a vow that I would not live or allow my family and friends to be compelled to live under the delusional control of tyrants pushing lockdown mandates using health orders as the excuse. I made this vow immediately after becoming aware of what officials in the state of California were doing to the people in that area. I had hoped that the same type of action would not come to Idaho, but my hopes were in vain, as in mid-March of 2020, Brad Little, Governor of Idaho, issued a statewide stay-home-order, much like California’s Governor Gavin Newsom did earlier that month.



Knowing very well that no state or other official has been granted the authority to order my friends, family or I to remain in our homes until we have their permission to leave. Knowing that no man or group of people have the right to order other men or women to stop trading with each other in an effort to provide for their families. Knowing that no man or group of people have the right to order other men or women not to visit and care for each other. Knowing that state officials have only been granted authority enumerated in the state and United States Constitutions. Knowing above all things that the right to travel, the right to visit with and care for each other, the right to leave our homes at will, the right to trade and provide for our families are endowed by God the Almighty Creator to each of His children residing upon this earth, and that no government official has the authority to alienate these rights from His children unless in defense of their own rights.

Knowing these things, I began to act openly in peaceful defiance of the immoral and unconstitutional usurpations coming from government officials within the state of Idaho.

BY SENATOR CHRIS TRAKEL (R-DISTRICT 11)
FEBRUARY 1, 2023

Op-Ed: Is There Real Controversy About the Freedom in Education Savings Accounts (ESA) Routing Slip?

BY CHRISTI WARHURST
JANUARY 30, 2023



Op-Ed: Lip Service To Liberty

BY BRIAN PARSONS
JANUARY 26, 2023

Holding regular public meetings, an Easter service, peacefully protesting at a Meridian police officer's home for arresting a mother who took her children to the park and organizing people to peacefully stand for the rights that God had given them. Never once did I damage any property, commit any violence or harm any person. It is not in my nature to do so.

However, these simple peaceful acts of non-compliance caused heads of several government agencies to communicate with each other about what should be done with Ammon Bundy. In one email chain between the head of the Idaho State Police, Colonel Kendrick Wills, Meridian Police Chief, Meridian Mayor, Robert Simison, the FBI JTTF (Joint Terrorist Task Force), Ada County Sheriff, Steve Bartlett, and several other heads of government agencies and offices in Idaho, all discussed to potentially raid the Easter service I had planned and mass arrest those attending. Imagine, in the United State of America, in the State of Idaho, heads of law enforcement and other officials plotting to raid a Christian worship service on Easter. And doing so because those assembling to worship God did not have permission from government officials to do so. Ultimately, these officials decided not to move forward with the raid and mass arrests because the Easter service was held in Gem County on private property. It is my belief that the Gem County Sheriff and Emmett Mayor did not support the action so they did not move forward with the raid.



In August 2020, Governor Little called for a special legislative session to gain legal immunity for the action of state officials during the lock-down orders. When the session began, hundreds of people came to the Idaho capitol building to attend. However, Scott Bedke, Speaker of the House, ordered the House gallery doors to be locked, guarded by Idaho State Police Troopers; stopping hundreds of people from legally attending the session. This caused many people to become very upset and eventually we pushed our way through the locked doors. I must mention that Idaho State law prohibits the doors to the House or Senate galleries from being locked at any-time during a regular or special session. Regardless, this law did not seem to matter to Speaker Scott Bedke or to the Idaho State Police Troopers. In-fact, instead of apologizing to the people for illegally blocking the doors, the next day, nearly half of the all the ISP Troopers in Idaho were ordered to report for duty at the capitol building. That afternoon an incident with the independent media was fabricated and I was arrested. My

crime was sitting quietly and non-disruptive in a public room in the Idaho capitol building (the Lincoln auditorium), during open hours, where no proceedings were taking place. The Lincoln auditorium doors were always open to the public until 7 PM each day. However, that day, at 5 PM, over 60 police officers entered the room and area and ordered me to leave. When I did not leave immediately, I was arrested and trespassed from the capitol building for a year. During my trial, over a year later, multiple police officers testified that I was “not being disruptive and had broken no rules.”

I do admit, at this point I became somewhat irrational. For I believed that I had a right to go into the Idaho capitol building and participate in the legislative process. I believed that the capitol building belonged to the people and not the government. I believed that somehow the people were going to make a difference in the capitol building and that I was to help motivate and unite them. And, I believe that I was targeted and falsely arrested so I could not influence the legislators or the people during that and the following sessions. Ultimately, I was arrested 3 more times for going back to the capitol building to attend legislative proceedings. Each time I was thrown in jail and sorely abused under the hand of the Ada County jailers.

To make matters worse, when I showed up to my first trespass trial, I was not allowed in the Ada County Courthouse because I would not wear a mask. After many attempts to get permission to go into the courthouse to attend my own trial, over a dozen Ada County Sheriff deputies exited the courthouse and arrested me for Failure to Appear (FTA) to my trial. On this occasion I spent 32 hours in an extremely cold holding cell in the Ada County Jail. The jailers refer to this cell as “the cold box”. It was very miserable and cruel.

For the next year and a half, I spent much of my life litigating these cases. Never once had I damaged any property, committed any violence or harmed any person. Yet, I was viciously prosecuted at the hands of a team of Ada County Attorneys. In the middle of these trials, I was also sentenced to 10 days in jail and fined \$3,000 (the maximum sentence possible) for Contempt of Court (COC). Judge Annie McDevitt disagreed with me in using campaign service hours for public service time. So, with no opportunity to redo the hours and with no jury involved, she threw the book at me and I spent 10 more days in solitary confinement in the Ada County Jail. I am sure to this day she believes that I deserve such a harsh punishment, but even my critics vocalized their surprise at her extreme and unusual sentence.

In early March of 2022, I received a call from my friend’s daughter Marissa Anderson. She was surrounded by police officers threatening to take her baby away. The Chavoya family are good friends of my family and we have spent much time together. They are one of the most loving, caring and politically active families that I know. The love and care

they display to each other and to their friends is inspiring to all those who know them. Marissa's father Diego and I, during 2020, became two of the most public figures in Idaho speaking out against the governor's lockdown orders. Especially against the massive federal funds that were being distributed into Idaho institutions due to Governor Little keeping Idahoans under executive emergency powers for over 2 years.

So, after participating in much public scrutiny against the most powerful people in Idaho, police officers surrounded Diego's family and forcefully took his grandson under a false pretense of child neglect. Eventually, the accusations against the family were all proven to be absolutely false. Over time, the state had to give baby Cyrus back, drop the CPS case all together and dismiss the criminal charges against Marissa the mother and Miranda the aunt. However, I do not find it a coincidence that St. Luke's Hospital, the #1 PRIVATE beneficiary of the federal COVID funds coming through Governor Little and the Idaho Department of Health and Welfare (IDHW), the #1 PUBLIC beneficiary of the COVID funds, are the two institutions that carried out the assault against the Chavoya family, who happens to also be some of my best friends. They did so by falsely reporting baby Cyrus' condition and sending the police after them.

That night, being extremely concerned for baby Cyrus, the family and the entire injustice of the situation, I showed up at St. Luke's Hospital where baby Cyrus was taken, demanding that he be given back to his family. After many demands, Meridian Police Officers arrested me and took me to the Ada County Jail. I must say, even though the Meridian Police Officers were completely in the wrong and acted to enforce the will of people grossly abusing the law, they were also lied to by officials from the Idaho Department of Health and Welfare (CPS). They were told that baby Cyrus was Failing to Thrive (FTT) and that he must be taken to the hospital for immediate care.

However, the evidence tells an entirely different story. Baby Cyrus was not taken to the hospital for care, he was forcefully taken from his parents and brought to the hospital to be immediately given to foster parents. Yes, this is correct, waiting there patiently in Meridian St. Luke Hospital were baby Cyrus' new foster parent(s). Baby Cyrus was deemed "a healthy baby" by the medical staff who told the foster parent(s) to "leave promptly". However, because of the commotion that I and those with me were causing outside the hospital by peacefully demanding Cyrus be given back to his parents, the foster parents had lost their will to take the baby and therefore Cyrus was transferred to Boise St. Luke's Hospital instead.

Read these hospital reports from that night:

"Health and welfare identified a foster family but due to protesters surrounding the hospital regarding this case, it

was felt that discharge with the family foster family from the emergency department was unsafe for all involved.”

“The sending physician handed us the pt [i.e. patient] secured in his car seat. She indicated the patient was in stable condition and requested that we leave promptly. She stated, “just go! This is a healthy baby with no interventions”...no acute life threats noted.”

The Idaho Department of Health and Welfare (CPS) misrepresented the truth about baby Cyrus, causing this entire situation. Baby Cyrus was and has always been cared for and loved to the extreme by his parents and family. His mother was breastfeeding and he had been thriving since birth, even though recently he was not reacting well to solid foods (not atypical for his age). CPS with the help of Meridian Police Officers took Cyrus away from his main source of nutrition (his mother), which was very concerning to many people, including myself. I felt I had the ability to bring attention to the matter and did so at the hospital by demanding that baby Cyrus be returned to his nursing mother.

Because of this incident, I and my family have once again suffered under the hands of Ada County Prosecutors for an additional year. The CPS case against baby Cyrus’ parents was dropped, the criminal case against baby Cyrus’ aunt was dismissed, the criminal case against baby Cyrus’ mother was dropped, but the case against me continues to go on and is scheduled for trial this month. If convicted, I face heavy fines and up to 1 year in jail. The Ada County Chief Judge, in the middle of these proceedings, reassigned my case to Judge Annie McDevitt, the same judge who already threw the book at me once and sentenced me to 10 days in jail and a \$3000 fine. Normally, Contempt of Court (COC) is a fine of a few hundred dollars with no jail time. So, it doesn’t take legal training to understand what she will try and do to me if I am convicted this time for helping baby Cyrus and his family.

It took about 6 days to get baby Cyrus back to his parents. The people at the Idaho Department of Health and Welfare (CPS) and Judge Laurie Fortier did not like the public scrutiny they were receiving and gave baby Cyrus back after about a week of hundreds of people protesting at St Luke’s Hospital, the CPS office and the Judge’s home. A few weeks later, St. Luke’s Hospital sued Diego Rodriguez (Cyrus’ grandfather) and myself for saying negative things about them. They retained Holland & Hart, LLP a law firm that also represents Governor Brad Little, Scott Bedke and the Idaho Department of Health & Welfare.

Each week, going on 5 months now, Diego and I have received mountains of court documents. Holland & Hart is sending documents to my business, home and associates, by personal service companies, Gem County Sheriff’s deputies, US Postal Service, Fed-Ex and UPS. Some documents are too big to print so they send electronic files

in packages to contain it all. Without exaggerating, I could have filled up a garbage dumpster to contain the amount of legal documents I have received from Holland & Hart. After speaking to an Idaho law firm (in hopes to defend myself) I was told that it would take at least 3 full time attorneys to respond to Holland & Hart's litigation on this case. Because this case may continue for several years, it is not impractical to calculate that it would take hundreds of thousands of dollars to properly defend against the onslaught of litigation paid for by donations given to St. Luke's Hospital.

I was informed by two very creditable, independent sources (one a high-ranking Ada County Official and the other an attorney who works with St. Luke's hospital) that St. Luke's CEO gave Holland & Hart a blank check to financially destroy Diego and I for speaking out against them in the role they played in taking baby Cyrus. So, rather than taking action to ensure that the situation with baby Cyrus does not happen again, instead, St Luke's CEO, Chris Roth, has authorized hundreds of thousands of dollars of donations given to St. Luke's Hospital to pay a law firm to financially destroy baby Cyrus' family and those who stood with them. I don't believe this is why people donate to St. Luke's Hospital. I believe those who donate to St. Luke's Hospital are under the impression that their donations are going to medically help children and other patients, not to fund a team of \$600 per hour bureaucrat attorneys sent to even a political score.

To date, St Luke's team of attorneys have used the courts to put a lien on my home, forcing me to sell it. I have been forced to liquidate all my assets except a few and my family and I have no idea when any of this will end. St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. Mis-using the courts, they have put us under constant threat of losing everything we have worked for our entire lives. Never once have I knowingly stepped inside a St. Luke's medical facility in Idaho. Never have I or my family received any medical treatment from a St. Luke's provider. I owe them nothing, yet they are trying to take everything. Anything I said about them (which was very minimal) I believe to be absolutely true, but they are using the courts to chill free speech and punish anyone who exposes them to the public. All of this, when they are the people who participated in stealing a baby from loving parents. Holland & Hart receiving open payments from St. Luke's Hospital to destroy lives by abusing the court is a prime example of Judicial Terrorism (JT).

In the last few years, I have been criminally charged many times for defending what the Idaho State and U.S. Constitutions were designed to protect. I have had so many court hearings that I have lost track of the number. I have endured multiple trials and spent weeks in solitary confinement in the Ada County Jail. I have been forced to sell my home and assets, been fined thousands of dollars and have not been able to rightfully provide for my family. Now, in less than a week, I will be forced to defend myself

again in trial against criminal trespass charges, facing a team of government attorneys, for peacefully standing outside St. Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me, sentenced by Judge Annie McDevitt. I am certain if I am thrown in jail, by the time I get out, St. Luke's Executives and Holland & Hart Partners with help from a few Ada County Judges, will do their best to take everything they can from me and strip my family from anything we have left.

Never once have I damaged any property, committed any violence or harmed any person. I have remained peaceful and stood for peaceful remedies even when forceful actions in defense may have been justified. I have stood as a barrier in protecting the very people who are harming me from those who believe that sometimes a way to right a wrong is not always peaceful. Everything I have done has been peaceful, even when police officers have falsely arrested me, abused me, my family and my friends and caused me to bleed by violence. Even when jailers have cruelly forced me to suffer for days. Even when judges have taken my income, wealth and stripped me of my rights. Even when the courts have allowed judicial terrorists to use the force of law to harass and financially assault my family. I pray every day to my Father in Heaven for the resolve to remain peaceful, but feel I have the justification to call upon my friends and defend myself by any means, even though I have no intention at this point to do so.

My only desire is to be left alone! But I cannot stand by when the rights to life, liberty and property are being violated all around me. It is my belief that if a man or woman smites me or my family once I should bear it patiently and not revile against them. If they smite me or my family a second time, I should not revile against them. But if they smite me or my family a third time I should bear it patiently as a testimony against them, but warn them, in the name of Jesus Christ, that they come no more upon me or my family, and if they do so, God will deliver them into my hands. However, if they repent at any time, I should forgive them. I have full faith in these words and intend to live by them.

I therefore warn; Blake Higley, Scott Bedke, Whitney Welsh, Chris Roth, Annie McDevitt, Erik Stidham, Brad Little and Keith Reynolds, in the name of Jesus Christ, that you come no more upon me or my family. I pray that I will be even more patient than I have been and hope that you will repent of your violations against the people of Idaho and myself. There is not one person that I hate or wish harm to come upon. I only hope that you will see that all men and women are equal to you and that you have no right to deprive anyone of the gifts that God has given them, no matter what authority or power you think you possess.

Humbly,

Original article containing links found here:

EXHIBIT M

**STATE OF WYOMING * SECRETARY OF STATE
BUSINESS DIVISION**

Herschler Bldg East, Ste.100 & 101, Cheyenne, WY 82002-0020
Phone: 307-777-7311 · Website: <https://sos.wyo.gov> · Email: business@wyo.gov

Filing Information



Please note that this form CANNOT be submitted in place of your Annual Report.

Name	Abish-husbandi Inc.		
Filing ID	2019-000867964		
Type	Profit Corporation	Status	Inactive - Administratively Dissolved (Tax)

General Information

Old Name		Sub Status	Current
Fictitious Name		Standing - Tax	Delinquent
		Standing - RA	Delinquent
Sub Type		Standing - Other	Good
Formed in	Wyoming	Filing Date	07/26/2019 4:42 PM
Term of Duration	Perpetual	Delayed Effective Date	
		Inactive Date	09/08/2022

Share Information

Common Shares	1,000,000	Preferred Shares	0	Additional Stock	N
Par Value	0.0000	Par Value	0.0000		

Principal Address

1881 W South Slop Rd
Emmett, ID 83617

Mailing Address

1881 W South Slop Rd
Emmett, ID 83617

Registered Agent Address

No Agent
No Office
Cheyenne, WY 82001

Parties

Type	Name / Organization / Address
Incorporator	Capital Administrations, LLC 1712 Pioneer Ave. Ste 115 Cheyenne, WY 82001

Notes

Date	Recorded By	Note
------	-------------	------

Filing Information



Please note that this form **CANNOT** be submitted in place of your Annual Report.

Name	Abish-husbandi Inc.	Status	Inactive - Administratively Dissolved (Tax)
Filing ID	2019-000867964		
Type	Profit Corporation		

Most Recent Annual Report Information

Type	Original	AR Year	2021
License Tax	\$50.00	AR Exempt	N
AR Date	6/7/2021 4:04 PM	AR ID	06326942
Web Filed	Y		

Officers / Directors

Type	Name / Organization / Address
President / Director	Ammon Bundy 1712 Pioneer Ave Ste 500 Cheyenne WY 82001

Principal Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Mailing Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Annual Report History

Num	Status	Date	Year	Tax
05804814	Original	06/19/2020	2020	\$50.00
06326942	Original	06/07/2021	2021	\$50.00

Amendment History

ID	Description	Date
2022-003830319	Dissolution / Revocation - Tax Filing Status Changed From: Active To: Inactive - Administratively Dissolved (Tax) Inactive Date Changed From: No Value To: 09/08/2022	09/08/2022
2022-003777596	RA Resignation	08/17/2022
2022-003777527	Address Update Principal Address 1 Changed From: 1712 Pioneer Ave To: 1881 W South Slop Rd Principal Address 2 Changed From: Ste. 500 To: No value Principal City Changed From: Cheyenne To: Emmett Principal State Changed From: WY To: ID Principal Postal Code Changed From: 82001 To: 83617	08/17/2022
2022-003725726	Delinquency Notice - Tax	07/02/2022
See Filing ID	Initial Filing	07/26/2019

EXHIBIT N

STATE OF WYOMING * SECRETARY OF STATE
BUSINESS DIVISION

Herschler Bldg East, Ste.100 & 101, Cheyenne, WY 82002-0020
Phone: 307-777-7311 · Website: <https://sos.wyo.gov> · Email: business@wyo.gov

Filing Information



Please note that this form CANNOT be submitted in place of your Annual Report.

Name	Dono Custos, Inc.		
Filing ID	2020-000893750		
Type	Profit Corporation	Status	Active

General Information

Old Name		Sub Status	Current
Fictitious Name		Standing - Tax	Good
		Standing - RA	Good
Sub Type		Standing - Other	Good
Formed in	Wyoming	Filing Date	01/07/2020 4:11 PM
Term of Duration	Perpetual	Delayed Effective Date	
		Inactive Date	

Share Information

Common Shares	1,000,000	Preferred Shares	0	Additional Stock	N
Par Value	0.0000	Par Value	0.0000		

Principal Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Mailing Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Registered Agent Address

Capital Administrations LLC
1712 Pioneer Ave Ste 115
Cheyenne, WY 82001

Parties

Type	Name / Organization / Address
Incorporator	Capital Administrations, LLC 1712 Pioneer Ave. Ste 115 Cheyenne, WY 82001

Notes

Date	Recorded By	Note
------	-------------	------

Filing Information



Please note that this form CANNOT be submitted in place of your Annual Report.

Name	Dono Custos, Inc.		
Filing ID	2020-000893750		
Type	Profit Corporation	Status	Active

Most Recent Annual Report Information

Type	Original	AR Year	2022
License Tax	\$60.00	AR Exempt	N
AR Date	1/21/2022 8:41 AM		
Web Filed	Y	AR ID	07034976

Officers / Directors

Type	Name / Organization / Address
President / Director	Ammon Bundy 1712 Pioneer Ave Ste 500 Cheyenne WY 82001

Principal Address	Mailing Address
1712 Pioneer Ave Ste. 500 Cheyenne, WY 82001	1712 Pioneer Ave Ste. 500 Cheyenne, WY 82001

Annual Report History

Num	Status	Date	Year	Tax
06033287	Original	12/24/2020	2021	\$50.00
07034976	Original	01/21/2022	2022	\$60.00

Amendment History

ID	Description	Date
2022-003522501	Delinquency Notice - Tax	01/02/2022
See Filing ID	Initial Filing	01/07/2020

EXHIBIT O

5/26/2021	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$79.18	A
5/27/2021	Rembrandts, 93 S Eagle Rd., Eagle, ID, 83616	\$56.89	F
5/28/2021	Discountmugs, 12610 Nw 115th Ave, Miami, FL, 33178	\$1,733.10	O
5/28/2021	Wdisplay, 5960 Pascal Ct., Carlsbad, CA, 92008	\$765.00	E
5/28/2021	4 Over, 1225 Los Angeles St., Glendale, CA, 91204	\$130.70	B
5/28/2021	Firesprint Printing, 4145 S 87th Street, Omaha, NE, 68127	\$2,389.00	O
5/28/2021	Discountmugs, 12610 Nw 115th Ave, Miami, FL, 33178	\$6,053.13	O
5/28/2021	Amazon, 410 Terry Ave N, Seattle, WA, 98109	\$1,801.99	L
5/29/2021	4 Over, 1225 Los Angeles St., Glendale, CA, 91204	\$130.60	L
6/1/2021	Abish-Husband Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
6/3/2021	Makestickers, 18621 81st Ave, Tinley Park, IL, 60487	\$465.08	O
6/6/2021	Corporations Today, 1712 Pioneer Ave, Cheyenne, WY, 82001	\$237.00	B
6/8/2021	Rembrandts, 93 S Eagle Rd., Eagle, ID, 83616	\$62.00	F
6/9/2021	Godaddy, 2155 E. GoDaddy Way, Tempe, AZ, 85284	\$155.76	G

6/28/2021	Wdisplay, 5960 Pascal Ct., Carlsbad, CA, 92008	\$460.00	E
7/1/2021	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
7/2/2021	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$142.44	G
7/2/2021	Four Eyed Monster, 243 W White Sands Dr., Meridian, ID, 83646	\$2,000.00	Z
7/2/2021	Chevron, 1580 S Washington Ave., Emmett, ID, 83617	\$115.00	A
7/7/2021	Maverick, 110 W Hwy 52, Emmett, ID, 83617	\$55.63	A
7/7/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$82.95	P
7/8/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$30.00	P
7/15/2021	Starlink, 500 Center Ridge Dr, Austin, TX, 78753	\$99.00	U
7/15/2021	Discountmugs, 12610 Nw 115th Ave, Miami, FL, 33178	\$1,286.53	O
7/15/2021	Gem County Fairgrounds, 2199 S Johns Ave. PO Box 443, Emmett, ID, 83617	\$100.00	E
7/16/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$43.95	P
7/16/2021	Alibaba, 525 Almanor Ave. 4th Floor, Sunnyvale, CA, 94085	\$952.66	E
7/16/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$61.30	P

7/31/2021	Bairds Dry Cleaning, 228 E Plaza St, Eagle, ID, 83616	\$77.45	G
7/31/2021	Buffalo Wild Wings, 1710 W Pullman Rd, Moscow, ID, 83843	\$34.16	F
7/31/2021	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$31.00	A
8/1/2021	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
8/2/2021	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$218.50	G
8/2/2021	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$95.00	A
8/2/2021	Big Insurance, 602 S Washington Ave 102, Emmett, ID, 83617	\$435.00	G
8/3/2021	Alicia Peterson, 4433 Southside Blvd, Melba, ID, 83641	\$227.42	E
8/4/2021	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$90.00	A
8/4/2021	SurveyMonkey, 285 Hamilton Avenue Suite 500, Palo Alto, CA, 94301	\$1,200.00	S
8/4/2021	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$30.00	A
8/4/2021	Albertsons, 640 ID-16, Emmett, ID, 83617	\$69.09	F
8/4/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$31.63	P
8/5/2021	Post Falls Parks & Rec, 408 N Spokane St., Post Falls, ID, 83854	\$400.00	E

7/31/2021	Bairds Dry Cleaning, 228 E Plaza St, Eagle, ID, 83616	\$77.45	G
7/31/2021	Buffalo Wild Wings, 1710 W Pullman Rd, Moscow, ID, 83843	\$34.16	F
7/31/2021	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$31.00	A
8/1/2021	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
8/2/2021	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$218.50	G
8/2/2021	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$95.00	A
8/2/2021	Big Insurance, 602 S Washington Ave 102, Emmett, ID, 83617	\$435.00	G
8/3/2021	Alicia Peterson, 4433 Southside Blvd, Melba, ID, 83641	\$227.42	E
8/4/2021	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$90.00	A
8/4/2021	SurveyMonkey, 285 Hamilton Avenue Suite 500, Palo Alto, CA, 94301	\$1,200.00	S
8/4/2021	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$30.00	A
8/4/2021	Albertsons, 640 ID-16, Emmett, ID, 83617	\$69.09	F
8/4/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$31.63	P
8/5/2021	Post Falls Parks & Rec, 408 N Spokane St., Post Falls, ID, 83854	\$400.00	E

8/17/2021	Homestead Family Restaurant, 1355 Parkway Dr., Blackfoot, ID, 83221	\$43.15	F
8/18/2021	Maverick, 110 W Hwy 52, Emmett, ID, 83617	\$32.87	A
8/18/2021	Ammon Bundy, 4615 Harvest Ln, Emmett, ID, 83617	\$25.00	E
8/18/2021	Power Marketing Consultants, 1876 E Adelaide, Meridian, ID, 83642	\$1,072.19	B
8/19/2021	Eureka Strategy Group, 331 J Street Suite 200, Sacramento, CA, 95814	\$6,400.00	G
8/19/2021	Pocatello Parks & Rec, 144 Wilson Ave, Pocatello, ID, 83201	\$25.75	E
8/19/2021	North Idaho State Fair, 4056 N Government Way, Coeur d'Alene, ID, 83815	\$900.00	E
8/19/2021	The Gold Mine, 3867 Hwy 21, Idaho City, ID, 83631	\$72.54	F
8/19/2021	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$118.47	A
8/20/2021	Righteous Signs & Designs, 35 S Drifter Lp., Nampa, ID, 83651	\$1,707.62	O
8/20/2021	Rembrandts, 93 S Eagle Rd., Eagle, ID, 83616	\$38.69	F
8/22/2021	Maverick, 110 W Hwy 52, Emmett, ID, 83617	\$43.22	A
8/23/2021	Walmart, 2470 W Pullman Rd, Moscow, ID, 83843	\$159.85	G
8/24/2021	Nez Perce Express, 17372 Nez Perce Rd., Lewiston, ID, 83501	\$41.87	A

8/30/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$26.90	B
8/30/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$25.00	B
8/31/2021	Pita Pit, 330 E Overland Rd., Meridian, ID, 83642	\$36.86	F
8/31/2021	Bi-Mart, 179 W Hwy 52, Emmett, ID, 83617	\$52.77	E
8/31/2021	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$25.00	B
8/31/2021	78 Main Street Eatery, 78 Main St., Lava Hot Springs, ID, 83246	\$34.46	F
8/31/2021	Bi-Mart, 179 W Hwy 52, Emmett, ID, 83617	\$36.20	G
8/31/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$35.00	B
8/31/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$75.00	B
8/31/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$50.00	B
9/1/2021	T-Mobile, PO Box 37380, Albuquerque, NM, 87176	\$846.18	G
9/1/2021	Walmart, 8300 W Overland Rd., Boise, ID, 83709	\$35.70	A
9/1/2021	Abish-Husband Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
9/1/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$63.10	B

9/29/2021	Penney Cosner Enterprises, 112 E Main St., Rogue River, OR, 97537	\$200.00	E
9/30/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$400.00	B
9/30/2021	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$25.00	B
10/1/2021	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
10/1/2021	Event Rent, 600 N Eagle Rd. #1, Meridian, ID, 83642	\$350.63	E
10/1/2021	Albertsons, 640 ID-16, Emmett, ID, 83617	\$31.20	F
10/2/2021	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$234.10	G
10/3/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$600.00	B
10/4/2021	Walmart, 3180 S 5600 W, West Valley City, UT, 84120	\$622.70	A
10/5/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$37.90	P
10/5/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$66.05	P
10/6/2021	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$125.00	A
10/6/2021	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$56.01	A
10/7/2021	Berry Oil, 1900 S Yellowstone Hwy, Idaho Falls, ID, 83402	\$150.00	A

10/7/2021	Bi-Mart, 179 W Hwy 52, Emmett, ID, 83617	\$55.07	G
10/7/2021	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$25.00	B
10/8/2021	Happy Chinese, 504 Shoup Ave., Idaho Falls, ID, 83402	\$50.32	F
10/8/2021	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$75.00	B
10/9/2021	Berry Oil, 1900 S Yellowstone Hwy, Idaho Falls, ID, 83402	\$75.00	A
10/10/2021	Sun Stop, 193 N State St., Preston, ID, 83263	\$95.00	A
10/10/2021	Mr Gas #20, 1223 W Main St., Jerome, ID, 83338	\$125.00	A
10/12/2021	Kevin Mack, 35 S Drifter Lp., Nampa, ID, 83651	\$256.52	O
10/12/2021	High Desert Prints, 2068 W Ditch Creek Dr., Meridian, ID, 83646	\$1,496.72	O
10/12/2021	Walmart, 4051 E Fairview Ave., Meridian, ID, 83642	\$26.02	G
10/12/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$26.80	P
10/12/2021	Discountmugs, 12610 Nw 115th Ave, Miami, FL, 33178	\$463.75	O
10/13/2021	Power Marketing Consultants, 1876 E Adelaide, Meridian, ID, 83642	\$3,400.00	B
10/13/2021	Idaho Pizza, 1312 S Washington Ave., Emmett, ID, 83617	\$46.32	F

10/22/2021	Medieval Collectibles, 401 N Richland Creek Dr, Princeton, IN, 47670	\$757.77	Z
10/24/2021	Facebook, 1 Hacker Way, Menlo Park, CA, 94025	\$251.18	B
10/25/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$32.27	P
10/26/2021	Ramnode, 555 S. Independence Blvd, Virginia Beach, VA, 23462	\$26.70	G
10/26/2021	High Desert Station, 6780 Willis Road PO Box 509, Star, ID, 83669	\$1,030.00	E
10/26/2021	Stinker Stores #117, 1410 W McMillan Rd., Meridian, ID, 83646	\$28.41	A
10/26/2021	Rsd, 35 S Drifter Lp., Nampa, ID, 83651	\$624.24	O
10/27/2021	Still Water Hollow, 18120 Dean Ln., Nampa, ID, 83687	\$1,500.00	E
10/28/2021	High Desert Prints, 2068 W Ditch Creek Dr., Meridian, ID, 83646	\$233.20	L
10/28/2021	High Desert Prints, 2068 W Ditch Creek Dr., Meridian, ID, 83646	\$1,083.74	O
10/29/2021	True Value, 132 S Washington St., Emmett, ID, 83617	\$33.01	G
11/1/2021	Abish-Husbondi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
11/2/2021	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$274.49	G
11/3/2021	Maverick, 110 W Hwy 52, Emmett, ID, 83617	\$27.79	A

11/29/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$38.55	P
11/29/2021	Stinker Stores #76, 317 S Washington Ave, Emmett, ID, 83617	\$125.00	A
11/29/2021	Righteous Signs & Designs, 35 S Drifter Lp., Nampa, ID, 83651	\$323.30	O
11/30/2021	Turbosmtp, 4411 Morena Blvd #230, San Diego, CA, 92117	\$80.00	G
11/30/2021	Nate Jones, 2885 Sanford Ave SW #45146, Grandville, MI, 49418	\$27.53	G
11/30/2021	Event Rent, 600 N Eagle Rd. #1, Meridian, ID, 83642	\$666.70	E
12/1/2021	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
12/2/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$63.29	P
12/2/2021	Jacksons, 7110 W Overland Rd., Boise, ID, 83709	\$58.50	A
12/2/2021	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$588.38	G
12/3/2021	Capitalone, PO Box 30285, Salt Lake City, UT, 84130	\$250.74	I
12/6/2021	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$100.00	B
12/6/2021	Bella Aquila Restaurant, 775 S Rivershore Ln., Eagle, ID, 83616	\$117.80	F
12/7/2021	D&B Supply, 111 Hwy 16, Emmett, ID, 83617	\$63.17	A

12/24/2021	Four Eyed Monster, 243 W White Sands Dr., Meridian, ID, 83646	\$4,000.00	Z
12/24/2021	Miranda Chavoya, 11171 W Edgehill Dr., Boise, ID, 83709	\$57.99	L
12/24/2021	Nicole Conklin - Sweet Events Design, 10720 N. Highway 52, Horseshoe Bend, ID, 83629	\$1,050.00	E
12/24/2021	Diego Rodriguez, 1876 E Adelaide, Meridian, ID, 83642	\$229.28	A
12/24/2021	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$63.00	F
12/24/2021	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$47.81	A
12/26/2021	Ramnode, 555 S. Independence Blvd, Virginia Beach, VA, 23462	\$36.79	G
12/28/2021	True Value, 132 Washington St, Emmett, ID, 83617	\$31.27	G
12/28/2021	True Value, 133 S Washington, Emmett, ID, 83617	\$173.66	G
12/28/2021	Dominos, 75 Washington St, Emmett, ID, 83617	\$25.36	F
12/29/2021	Usps, 521 E Main St., Emmett, ID, 83617	\$41.45	P
12/29/2021	Stinker Gas Station, 75 E Washington St, Emmett, ID, 83617	\$117.50	A
12/31/2021	Power Marketing Consultants, 1876 E Adelaide, Meridian, ID, 83642	\$25,000.00	Z
12/31/2021	Bi-Mart, 179 W Hwy 52, Emmett, ID, 83617	\$274.99	G



**48 HOUR NOTICE OF CONTRIBUTIONS / LOANS
RECEIVED OF \$1,000 OR MORE**

C-5

IDAHO CODE 67-6607(3)

Notwithstanding any other reports required under this section, each candidate and each political committee, or the political treasurer for each candidate and each political committee, shall notify the secretary of state of any contribution of one thousand dollars (\$1,000) or more. This notification shall be made within forty-eight (48) hours after the receipt of such contribution and shall include the name of the candidate, political committee or measure, the identification of the contributor, and the date of receipt and amount of the contribution. The notification shall be in addition to the reporting of these contributions in the regular reports.

This requirement applies to all types of contributions, including but not limited to:

- cash contributions
- in-kind contributions
- loans
- contributions or personal loans made by the candidate.

CANDIDATE/COMMITTEE INFORMATION

Name of Candidate or Committee

AMMON BUNDY

Mailing Address

Street Address

P.O. BOX 370

City

EMMETT

State

ID

Zip Code

83617

CONTRIBUTION INFORMATION

CONTRIBUTION AMOUNT

Date Received	Full Name, Mailing Address, and Zip Code of Contributor/Lender	Cash or Check	In-Kind (non-monetary)	Loan
12/28/2021	FREEDOM TABERNACLE, PO BOX 190088, BOISE, ID 83709			
Election Type	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	\$ 5,000.00	\$ 0.00	\$ 0.00
Initial Filing				

CERTIFICATION

I, ARRON WELLING, hereby certify that the information in this report is true, complete, and correct.
(Name of Political Treasurer)

Signature of Political Treasurer

ARRON WELLING

Date Signed

12/30/2021

RETURN THIS FORM TO

Secretary of State
Elections Division
PO Box 83720
Boise, ID 83720-0080

Phone: (208) 334-2852

Fax: (208) 334-2282



48 HOUR NOTICE OF CONTRIBUTIONS / LOANS RECEIVED OF \$1,000 OR MORE

C-5

IDAHO CODE 67-6607(3)

Notwithstanding any other reports required under this section, each candidate and each political committee, or the political treasurer for each candidate and each political committee, shall notify the secretary of state of any contribution of one thousand dollars (\$1,000) or more. This notification shall be made within forty-eight (48) hours after the receipt of such contribution and shall include the name of the candidate, political committee or measure, the identification of the contributor, and the date of receipt and amount of the contribution. The notification shall be in addition to the reporting of these contributions in the regular reports.

This requirement applies to all types of contributions, including but not limited to:

- cash contributions
- in-kind contributions
- loans
- contributions or personal loans made by the candidate.

CANDIDATE/COMMITTEE INFORMATION

Name of Candidate or Committee

AMMON BUNDY

Mailing Address

Street Address

P.O. BOX 370

City

EMMETT

State

ID

Zip Code

83617

CONTRIBUTION INFORMATION

CONTRIBUTION AMOUNT

Date Received	Full Name, Mailing Address, and Zip Code of Contributor/Lender	Cash or Check	In-Kind (non-monetary)	Loan
12/28/2021	POWER MARKETING, 1876 E ADELAIDE, MERIDIAN, ID 83642			
Election Type	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	\$ 5,000.00	\$ 0.00	\$ 0.00
Initial Filing				

CERTIFICATION

I, ARRON WELLING, hereby certify that the information in this report is true, complete, and correct.
(Name of Political Treasurer)

Signature of Political Treasurer

ARRON WELLING

Date Signed

12/30/2021

RETURN THIS FORM TO

Secretary of State
Elections Division
PO Box 83720
Boise, ID 83720-0080

Phone: (208) 334-2852

Fax: (208) 334-2282



**SCHEDULE B:
ITEMIZED EXPENDITURES
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	January 2022 Report

ITEMIZED CONTRIBUTIONS OF MORE THAN FIFTY DOLLARS (\$50) THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
1/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
1/3/2022	True Value, 132 S Washington, Emmett, ID, 83617	\$88.33	G
1/3/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$100.00	B
1/4/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$200.00	B
1/4/2022	Maverick, 110 W Hwy 52, Emmett, ID, 83617	\$42.50	A
1/5/2022	Dominos, 75 Washington St, Emmett, ID, 83617	\$58.00	F
1/5/2022	Alibaba, 525 Almanor Ave. 4th Floor, Sunnyvale, CA, 94085	\$1,029.90	G
1/5/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$350.00	G
1/5/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$845.14	G
1/6/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$100.00	B

1/15/2022	Nomnom, 901 W Main St, Grangeville, ID, 83530	\$66.37	A
1/15/2022	Grangeville Senior Center, 130 Truck Route, Grangeville, ID, 83530	\$60.00	E
1/15/2022	Nomnom, 901 W Main St, Grangeville, ID, 83530	\$100.00	A
1/15/2022	Turbosmtp, 4411 Morena Blvd #230, San Diego, CA, 92117	\$79.95	B
1/18/2022	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$116.50	A
1/18/2022	Power Marketing Consultants, 1876 E Adelaide, Meridian, ID, 83642	\$3,676.25	B
1/18/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$100.00	B
1/19/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$78.00	P
1/19/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$599.80	P
1/19/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$30.60	P
1/20/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$99.52	P
1/20/2022	Rolbertos Mexican Food, 55 Airbase Rd., Twin Falls, ID, 83647	\$54.63	F
1/21/2022	Baldy Mountain Media, 57 Wood View Rd, Sandpoint, ID, 83864	\$125.00	E
1/21/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$100.00	B



**SCHEDULE B:
ITEMIZED EXPENDITURES
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	February 2022 Report

ITEMIZED CONTRIBUTIONS OF MORE THAN FIFTY DOLLARS (\$50) THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
2/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
2/1/2022	Auto Zone, 145 South Washington St., Emmett, ID, 83617	\$34.32	G
2/1/2022	Stinker Stores #110, 630 Hwy 16, Emmett, ID, 83617	\$75.00	A
2/1/2022	Fishers Technology, 575 E 42nd St, Garden City, ID, 83714	\$408.10	G
2/2/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$572.32	G
2/2/2022	The Herald Journal, 1068 W 130 S, Logan, UT, 84321	\$370.50	N
2/2/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$30.26	P
2/2/2022	Nate Jones, 2885 Sanford Ave SW #45146, Grandville, MI, 49418	\$4,000.00	G
2/3/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$497.80	P
2/3/2022	Displays2gocom, 81 Commerce Drive, Fall River, MA, 02720	\$139.61	G



**SCHEDULE B:
ITEMIZED EXPENDITURES
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	March 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
3/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
3/1/2022	Foremost, P.O. Box 0915, Carol Stream, IL, 60132	\$115.10	A
3/2/2022	Righteous Signs & Designs, 35 S Drifter Lp., Nampa, ID, 83651	\$596.25	O
3/2/2022	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$42.63	P
3/3/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$733.22	G
3/4/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$116.35	P
3/4/2022	Loves Truck Stop, 680 US Hwy 30, Bliss, ID, 83314	\$125.00	A
3/8/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$300.00	B
3/8/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$113.57	P
3/9/2022	Nate Jones, 2885 Sanford Ave SW #45146, Grandville, MI, 49418	\$150.00	B



**SCHEDULE B:
ITEMIZED EXPENDITURES
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	April 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
4/1/2022	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$65.47	F
4/1/2022	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$177.75	N
4/1/2022	Riley Gilbert, PO Box 1071, Emmett, ID, 83617	\$75.00	A
4/1/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$21.90	P
4/1/2022	Riley Gilbert, PO Box 1071, Emmett, ID, 83617	\$75.00	A
4/1/2022	Righteous Signs & Designs, 35 S Drifter Lp., Nampa, ID, 83651	\$200.34	L
4/1/2022	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$33.14	G
4/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
4/3/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$219.16	G
4/4/2022	4 Over, 1225 Los Angeles St., Glendale, CA, 91204	\$233.40	G



**SCHEDULE B:
ITEMIZED EXPENDITURES
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	May 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
5/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
5/2/2022	Dynamic Arts, 800 E Locust, Emmett, ID, 83617	\$550.00	G
5/2/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$15.78	P
5/2/2022	Clarity Credit Union, PO Box 500, Nampa, ID, 83653	\$28.00	G
5/3/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$39.48	P
5/3/2022	Clarity Credit Union, PO Box 500, Nampa, ID, 83653	\$20.00	G
5/3/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$188.98	G
5/9/2022	Signalwire, 228 Hamilton Ave, Palo Alto, CA, 94301	\$200.00	B
5/10/2022	Blue Ribbon, 515 S. Washington Ave., Emmett, ID, 83617	\$45.92	F
5/14/2022	T-Mobile, PO Box 37380, Albuquerque, NM, 87176	\$220.80	U



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ITEMIZED EXPENDITURES
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	June 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
6/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
6/1/2022	Caldwell Parks & Recreation, 618 Irving Street, Caldwell, ID, 83605	\$75.00	E
6/3/2022	Pc Signs, 2534 Commerce Blvd, Cincinnati, OH, 45241	\$3,864.69	L
6/3/2022	Blue Ribbon, 515 S. Washington Ave., Emmett, ID, 83617	\$35.97	F
6/3/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$631.12	G
6/4/2022	Owyhee County Fair Board, P.O. Box 695, Homedale, ID, 83628	\$100.00	E
6/4/2022	Bretz Rv, 12004 Franklin Ave, Nampa, ID, 83651	\$227.04	G
6/5/2022	Lewis Clark Trader, P.O. Box 219, Lewiston, ID, 83501	\$80.00	E
6/6/2022	Pilot, 1050 Hwy 20, Mountain Home, ID, 83647	\$125.00	A
6/6/2022	True Value, 132 S Washington, Emmett, ID, 83617	\$33.07	G



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OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	July 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
7/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
7/2/2022	Common Cents, 1003 South Blvd., Idaho Falls, ID, 83401	\$125.00	A
7/2/2022	Common Cents, 1003 South Blvd, Idaho Falls, ID, 83401	\$68.84	A
7/2/2022	Sizzler 10660, 2380 E 17th St., Idaho Falls, ID, 83404	\$92.75	F
7/3/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$448.22	G
7/5/2022	Oasis Stop 'N Go, 305 Custer, Mackay, ID, 83251	\$175.00	A
7/5/2022	Village Inn, US Hwy 93, Challis, ID, 83226	\$140.00	F
7/7/2022	Maverick, 859 W Main St., Rexburg, ID, 83440	\$63.52	A
7/7/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$32.20	P
7/7/2022	Walmart, 1450 N 2nd E, Rexburg, ID, 83440	\$63.03	G

7/12/2022	Medieval Times, 4510 W Vine S, Kissimmee, FL, 34746	\$200.00	A
7/12/2022	Medieval Times, 4510 W Vine S, Kissimmee, FL, 34746	\$25.00	F
7/12/2022	Wayside Cafe, 322 Hwy 24, Heyburn, ID, 83336	\$100.58	F
7/13/2022	Signalwire, 228 Hamilton Ave., Palo Alto, CA, 94301	\$500.00	B
7/14/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$28.02	P
7/14/2022	Ziggys Express Gas & Grill, 745 E US HWY 30, Bliss, ID, 83314	\$174.99	A
7/14/2022	Red Robin, 1824 Blue Lakes Blvd N, Twin Falls, ID, 83301	\$110.26	F
7/15/2022	Iheartmedia Inc, 20880 Stone Oak Parkway, San Antonio, TX, 78258	\$1,200.00	B
7/15/2022	Boise Airport, 10220 Airport Ln., Boise, ID, 83709	\$52.00	A
7/15/2022	Rexburg Area Chamber Of Commerce, 167 W Main St. Suite 2, Rexburg, ID, 83440	\$30.00	E
7/17/2022	T-Mobile, 288 ID-16 Suite 102, Emmett, ID, 83617	\$211.67	G
7/18/2022	Western Idaho Fair - Expo Idaho, 5610 Glenwood, Garden City, ID, 83714	\$985.00	E
7/18/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$73.15	P
7/19/2022	Wendy Leatham, 4615 Harvest Lane, Emmett, ID, 83617	\$43.69	A



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§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	August 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
8/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
8/1/2022	Dynamic Arts, 800 E Locust, Emmett, ID, 83617	\$50.00	U
8/1/2022	Firesprint Printing, 4145 S 87th St., Omaha, NE, 68127	\$4,203.08	O
8/1/2022	4 Over, 1225 Los Angeles St., Glendale, CA, 91204	\$222.96	O
8/2/2022	Lemhi County Fair, 200 Fulton Suite 202, Salmon, ID, 83467	\$100.00	E
8/2/2022	Shelley Kiwanis Club, PO Box 461, Shelley, ID, 83274	\$125.00	E
8/2/2022	Alibaba, 525 Almanor Ave. 4th Floor, Sunnyvale, CA, 94085	\$1,068.53	O
8/2/2022	Nate Jones, 2885 Sanford Ave SW #45146, Grandville, MI, 49418	\$4,000.00	G
8/3/2022	Cornerstone Payment Systems, 15941 Red Hill, Tustin, CA, 92780	\$504.32	G
8/5/2022	Stinker Gas Station, 75 E Washington St., Emmett, ID, 83617	\$150.00	A



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§67-6607(1b), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Ammon Bundy	September 2022 Report

ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD			
Date	Recipient Name and Address	Amount	Purpose Code(s)
9/1/2022	Shell Oil, 1340 S Washington Ave., Emmett, ID, 83617	\$130.68	A
9/1/2022	Abish-Husbandi Inc, 800 E Locust St., Emmett, ID, 83617	\$1,500.00	G
9/1/2022	Taco Bell, 1340 S Washington Avenue, Emmett, ID, 83617	\$6.42	F
9/1/2022	T-Mobile, PO Box 37380, Albuquerque, NM, 87176	\$50.00	G
9/1/2022	4Over, 1225 Los Angeles St., Glendale, CA, 91204	\$144.47	O
9/2/2022	Nate Jones, 3801 SW 1st Ave., New Plymouth, ID, 83655	\$100.00	B
9/2/2022	Sarah Clendenon, 11274 W Abram Dr, Boise, ID, 83713	\$30.00	E
9/2/2022	Clarity Credit Union, PO Box 500, Nampa, ID, 83653	\$20.00	G
9/2/2022	Usps, 521 E Main St., Emmett, ID, 83617	\$14.53	P
9/2/2022	Sarah Clendenon, 11274 W Abram Dr, Boise, ID, 83713	\$150.00	E

EXHIBIT P



Do you have questions about the upcoming general election? Ask them here.

Ammon Bundy pays himself thousands in campaign cash

Boise State Public Radio News | By James Dawson

Published March 25, 2022 at 11:07 AM MDT



Keith Ridler / AP

In this Aug. 24, 2020, file photo, Ammon Bundy, center, who led the Malheur National Wildlife Refuge occupation, stands on the Idaho Statehouse steps in Boise, Idaho. Mainstream and far-right Republicans are battling for control of the party and the state in deeply conservative Idaho.

Ammon Bundy, the anti-government activist running as an independent candidate to be Idaho's next governor, has paid thousands of dollars in campaign donations to a company he owns

BSPR News On-Air Latino USA

According to campaign finance records, Bundy's campaign has paid \$13,500 in \$1,500 monthly installments since June 1, 2021 to Abish-Husbandi Inc, a company incorporated in Wyoming.

The address listed on his campaign finance report traces back to a warehouse in Emmett where he's held protests against, and in defiance of, Gov. Brad Little's stay-at-home order in early 2020. Gem County property records list Abish-Husbandi Inc as the owner of the three-acre property.

The company's name appears to be a nod to Abish, [a figure in the Book of Mormon](#) who encounters the missionary Ammon. [Husbandi is an Old Norse word](#) said to mean "master of the house."

Bundy is listed as the company's president and sole officer in an annual report filed June 7, 2021.

Idaho law states that, in general, ["A contribution shall not be converted by any person to personal use."](#)

However, the law appears silent on whether a candidate can contract with their own businesses. Explicitly prohibited activities include paying a candidate's mortgage, utility bills, vacation or tuition with political donations.

"I am not aware of any active complaints in this area," said Chief Deputy Secretary of State Chad Houck in an email from late January. "The only time we would ask such a question of a campaign is on the back of a filed complaint specifically detailing alleged violations."

Houck said Friday his office has yet to receive a complaint regarding these expenditures.

When asked about the payments to Abish-Husbandi Inc, Wendy Leatham, Bundy's campaign manager, declined to say what they were for. They're listed as general operational expenses in campaign finance records.

In an email Friday, Leatham said the campaign "follows all finance laws as administered by the Idaho Secretary of State."



Bundy, [who orchestrated the armed takeover of a federal wildlife refuge in Oregon in 2016](#), announced his bid for governor last year. He initially said he would run for the Republican nomination, [but instead chose to run as an independent in February](#).

Bundy's campaign finance records also raise other transparency questions.

[Freedom Tabernacle](#), a church incorporated in Idaho since 2011 owned by the vocal Bundy backer, Diego Rodriguez, donated \$5,000 to the campaign Dec. 28, 2021.

A spokesperson for the Idaho Attorney General's office said in an email that registered churches in Idaho aren't prohibited from making political donations under state law.

But the federal Internal Revenue Service [explicitly forbids 501\(c\)3 nonprofits from such political activity](#).

Freedom Tabernacle isn't registered as a tax-exempt charity with the federal government, [but churches that meet certain requirements are automatically considered 501\(c\)3 entities by the IRS](#).

Freedom Tabernacle also serves as the biller for online donations made to Bundy's far-right People's Rights network that boasts 50,000 members nationwide.

The church is part of a web of entities controlled by Rodriguez, a far-right pastor who's spread misinformation about COVID-19 and [called the vaccine the "CovAIDS jab."](#)

Under the Freedom Tabernacle banner, he operates:

- 4th Day Alliance, a ministry "dedicated to proclaiming the Glory of God through astronomy"
- Dominion Books, which publishes Rodriguez's five books on faith
- Search & Study Bible Teaching Ministry

Rodriguez is also the founder and president of Power Marketing Consultants LLC, a marketing firm which lists his wife and five children as staff members.

His family each made \$5,000 in-kind contributions – the maximum allowed by state law



and production. Rodriguez added another \$4,860 in-kind contribution that same day.

Bundy's campaign paid Power Marketing Consultants \$29,472.19 last year for advertising.

Rodriguez didn't respond to a request for comment.

Follow James Dawson on Twitter [@RadioDawson](#) for more local news.

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Tags

- Politics & Government
- 2022 Election
- Ammon Bundy








James Dawson

I cover politics and a bit of everything else for Boise State Public Radio. Outside of public meetings, you can find me fly fishing, making cool things out of leather or watching the Seattle Mariners' latest rebuilding season. If you have a tip, please get in touch!

[See stories by James Dawson](#)



EXHIBIT Q



Offline

To help in a more traditional fashion,
a **check** or **money order** made
payable to the address below, may be
sent via standard US Mail...

DONO CUSTOS

PO Box 370, Emmett, ID 83617,
USA

([Dono Custos](#) is an entity created
specifically to handle gifts made to
worthy efforts like People's Rights.)



Card Number



Give — once

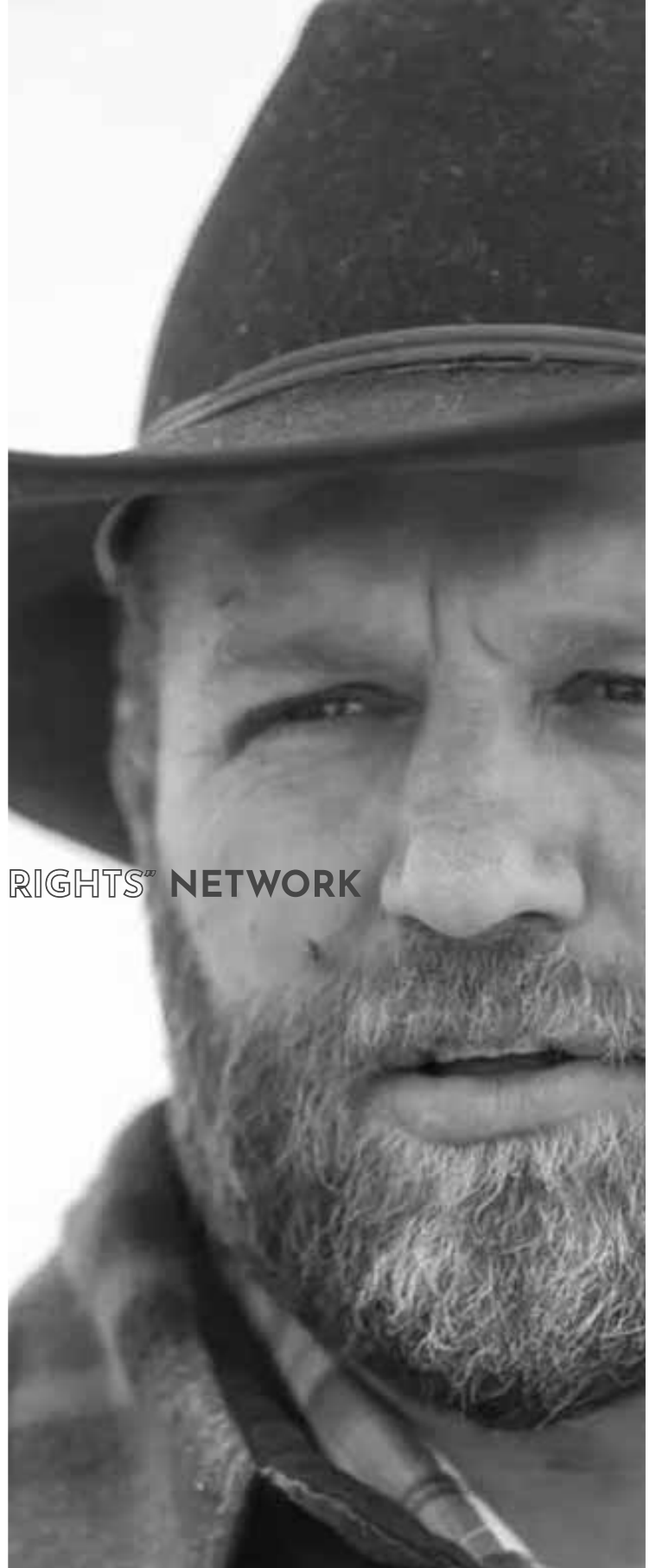


Your information is secure.

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[Terms of Service](#) and [Privacy Policy](#).

(**Please Note:** Your bank statement
will show a donation to **FREEDOM
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EXHIBIT R



AMMON'S ARMY

INSIDE THE FAR-RIGHT "PEOPLE'S RIGHTS" NETWORK

A SPECIAL REPORT BY THE INSTITUTE FOR RESEARCH & EDUCATION ON HUMAN RIGHTS AND THE MONTANA HUMAN RIGHTS NETWORK.

INTRODUCTION

"ARE YOU READY FOR CIVIL WAR NOVEMBER 4"

--Tony Pellegrino, People's Rights [1]

SEIZING ON COVID-19 ANXIETY, AMMON BUNDY AND HIS ALLIES HAVE CULTIVATED A DANGEROUS NEW NETWORK OF MILITIA MEMBERS, ANTI-MASKERS, CONSPIRACISTS, PREPPERS, ANTI-VAXXERS, AND OTHERS INTO AN ARMY OF FOLLOWERS—AMMON'S ARMY.

This report by the Institute for Research and Education on Human Rights and the Montana Human Rights Network explores the breadth and depth of the network built by Bundy and named "People's Rights." What started in late March with a few dozen supporters in a rural Idaho warehouse has swiftly expanded to a membership base of over twenty thousand across the country.

Relying on field reports, countless hours of video footage, interviews, archival material, and a massive trove of online data, report researchers have captured the first full picture of Ammon's army.

Data presented in this report suggests that the rapid growth of the People’s Rights network has been spurred by a fusion of Bundy’s core of the far-right paramilitary supporters built up over years of armed standoffs with a mass base of new activists radicalized in protest over COVID-19 health directives.

The leadership of the People’s Rights network has remained hidden, locked away inside a new online platform away from public scrutiny, until now. Under the People’s Rights banner, Bundy has assembled a team of 153 “assistants” in sixteen states. This report, for the first time, names all 153 of those activists and examines their backgrounds—including extensive far-right activism by many area assistants. Though the national and state leadership is still dominated by men, this report also documents how People’s Rights has a majority of women in local leadership positions—a first for modern far-right networks.

This report also details how People’s Rights carved up the country into local areas. It maps the locations of the more than twenty thousand members of the People’s Rights network. It also dives into the data collected by report researchers on the composition of the online membership base of the twenty-two different People’s Rights Facebook groups that helped accelerate the spread of the network. The report digs into the new online platform developed by People’s Rights, a way to communicate with activists in case of de-platforming by major social networks.

The results of this study contravene many of the myths surrounding the People’s Rights network. Instead of a more traditional “anti-government” narrative, People’s Rights leaders have expressed a desire for governmental power to be used to protect the “righteous” against “wicked” liberals, antifa, Black Lives Matter activists, and others. Several People’s Rights leaders are running for elected office—to *become* the government. Absent that sort of intervention, leaders have proposed a type of armed enclave-style “neighborhood” nationalism, where “righteous” neighbors stand against the “wicked.” People’s Rights leaders have often defined the “wicked” using far-right conspiracism, racism, antisemitism, anti-indigenous, and anti-transgender sentiment.

Despite the different network branding, this report further highlights how the People’s Rights network shares many commonalities with far-right paramilitary movements of the

Throughout the report, the danger of Ammon’s army becomes evident. Already there have been significant clashes and growing rage. In the context of the pandemic, it puts the lives of community members and public servants at risk, straining democratic institutions, and damaging civil society. We hope this report will serve as an alert to all communities in the path of Ammon’s army.

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THREE: THE ONLINE ARMY

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FIVE: THE POSSE RIDES AGAIN

SIX: MIDDLE AMERICAN NEIGHBORHOOD NATIONALISM

SEVEN: CONSPIRACIES AND ANTISEMITISM UNBOUNDED

EIGHT: PEOPLES RIGHTS AND RACISM

NINE: ANTI-INDIGENOUS ACTIVISM

TEN: POLITICAL POWER

ELEVEN: PREPPING FOR THE FUTURE

TWELVE: NOTABLE NETWORK FIGURES

THIRTEEN: CONCLUSION



POINT OF THE SPEAR

AMMON BUNDY AND THE MALHEUR ARMED OCCUPATION

The origins of the People’s Rights network and the insurrection against COVID-19 restrictions can be traced back four years to the snow-swept terrain of the southeast Oregon high desert. For all the recent viral far-right misinformation claiming “antifa” started wildfires across the West, it’s important to remember that the 2016 armed takeover of the Malheur Wildlife Refuge in Oregon began as a rally supporting two ranchers convicted of arson wildfires on federal land.

Rancher Dwight Hammond Jr., and his son, Steven, were convicted of starting a 2001 wildfire on federal land, allegedly to cover up illegal deer poaching. Steven Hammond “handed out ‘Strike Anywhere’ matches with instructions that they be lit and dropped on the ground because they were going to ‘light up the whole country on fire.’”^[2] Steven Hammond was also convicted of a 2006 arson in a national wildlife refuge.

When the Hammonds were ordered to serve their full sentences, militia members, Three Percenters, Tea Partiers, and other so-called “patriots” from across the country converged on Burns, Oregon to protest. Among those in attendance was Ammon Bundy, who had become a larger-than-life movement figure after the 2014 armed standoff at his father’s ranch in Nevada. Following a demonstration, a small group of activists led by Bundy left the rally to take over the dormant buildings of the Malheur National Wildlife Refuge to take a “hard stand” against federal “tyranny.”^[3]

At a press conference during the takeover, Bundy laid out his rationale for seizing the facility as part of a larger crusade to steal public lands.^[4] Calling for reinforcements, Bundy declared that they were the “point of the spear that’s going to bring confidence and strength to the rest of the people.”^[5] Many, indeed, were emboldened by Bundy’s actions.

After forty days, the armed occupation came to an end with one man dead and more than two dozen occupiers charged with federal offenses. In the legal battle for the Malheur invaders that ensued, Bundy quietly built up a core group of dedicated followers. They helped promote Bundy and did support work for the numerous people who went to trial for involvement in the armed takeover. In the end, the arsonists were pardoned by President Trump, while Ammon Bundy and most of the Malheur militants were freed by the courts. Then along came the COVID-19 pandemic. What was past became prologue as the group of militia members and



FROM MALHEUR TO MASKS

AMMON BUNDY & THE COVID-19 INSURRECTION

As governors around the country began putting in place rules to prevent the spread of the COVID-19 pandemic, Ammon Bundy started gathering people together to stop them. On March 26, Bundy held an initial meeting in his warehouse in a dusty lot near the railroad tracks in Emmett, Idaho.[6] By that day, a total of 79,785 confirmed cases of COVID-19 in the US had been reported, with 1,136 deaths from the virus.[7]

At a germinal gathering of what would become People's Rights on April 2, Ammon Bundy oversaw a meeting where COVID-19 health restrictions dominated the conversation. One participant lamented that "If we knew for sure that 150 million people were going to die that would be tragic and sad and very unfortunate, but that still doesn't trump our freedom and our rights." [8]

There was widespread agreement in the room about the need to change the narrative away from "focusing on the virus" to "focus on our freedoms and our rights." [9]

When the group reconvened a week later, seventy-two people were in attendance to hear Bundy announce the new name for the group and describe how quickly they had grown.

"We have more people here than we had before, and we've started to get organized, so bear with us because it feels like oh man they're not that organized. And we're not. But every day and every week we get more and more organized. We put this in place. We put this in place.

capable of defending their liberties because we're united. That's what's happening here. So

one of the things we've done we've put a way that people can basically join, if you wanna call it that, People's Rights, or whatever you want to call it. And we have a contact list that's now probably over 300 people. So that's a good little start, ok.”[10]

During the event, they announced that they would defy the governor's stay-at-home directives and hold an Easter service. Though only about sixty people attended the Easter rally, the defiant disregard for public health drew national attention.[11]

Bundy and People's Rights created a network based on aggressive, belligerent non-compliance with the COVID-19 health directives. Bundy has repeatedly told his crowds, “Do not comply. That is what it will take.”[12]

To help slow the spread of the coronavirus pandemic, like many places the city of Meridian, Idaho, closed playgrounds and outdoor exercise equipment (while leaving walking paths open). On April 21, nine days after the Easter protest in nearby Emmett, Sara Walton Brady, leader of the anti-vaxxer group, Idahoans for Vaccine Freedom, staged a protest at a closed playground and was arrested after multiple requests to leave. She broadcast her arrest on social media. In an aggressive response to Walton Brady's arrest, Ammon Bundy and a group of about 40 people protested outside of the arresting police officer's home.[13] One person, who identified themselves as a member of the III% of Idaho, called the Meridian Police Department to demand, “It's time to choose a side. We can't stand what you people do. We will make you abide by the Constitution.”[14] The combined actions reaped national attention, another spark to ignite insurrection. Sara Walton Brady became a member of the People's Rights Idaho group, which helped bring anti-vaxxers into the network.

The series of visible confrontations became a rallying cry around the country, setting off a wave of protests that one week later saw heavily-armed militia members storm the Michigan legislative chambers and the governor hung in effigy. It also gave spark to far-right groups opposed to COVID-19 restrictions. From April to September, the number of those groups swelled to 1,186 with 3,032,085 members.[15]

As attention shifted to the massive number of vocal groups clamoring to reopen the economy in the middle of a pandemic and opposing any sorts of health mandates like wearing masks,



AMMON'S ARMY

INSIDE THE FAR-RIGHT PEOPLE'S RIGHTS NETWORK

An IREHR / MHRN Special Report



NEXT

TWO: UNCOVERING THE PEOPLE'S RIGHTS NETWORK

NOTES

[1] Pellegrino, Tony. Facebook. September 18, 2020.

<https://www.facebook.com/tony.pellegrino.75/posts/1468260086708076>.

[2] Department of Justice, U.S. Attorney's Office, District of Oregon. "Eastern Oregon Ranchers Convicted of Arson Resentenced to Five Years in Prison." The United States Attorney's Office, District of Oregon website. October 7, 2015. <https://www.justice.gov/usao-or/pr/eastern-oregon-ranchers-convicted-arson-resentenced-five-years-prison>.

[3] Dickinson, Tim. "WTF is Happening in the Oregon Militia Standoff, Explained." *Rolling Stone*. January 3, 2016. <https://www.rollingstone.com/politics/politics-news/wtf-is-happening-in-the-oregon-militia-standoff-explained-31574/>.

[4] Bundy declared, "We have basically taken over the Malheur National Wildlife Refuge and this will become a base place for patriots from all over the country to come and be housed here and live here. And we're planning on staying here for several years. And while we're here, we're going to be bringing these lands up and giving the ranchers back their ranch, giving the miners back the mines, giving the loggers back the logging, and where they can do it under the protection of the people, and not be afraid of this tyranny that's been upon them." Zaitz, Les. "Militia takes over Malheur National Wildlife Refuge headquarters." *The Oregonian*. January 2, 2016. https://www.oregonlive.com/pacific-northwest-news/2016/01/drama_in_burns_ends_with_quiet.html.

[5] Yuhas, Alan. "Oregon militia says occupation of wildlife refuge could last 'several years'." *The Guardian*. January 4, 2016. <https://www.theguardian.com/us-news/2016/jan/04/oregon-militia-ammon-bundy-malheur-national-wildlife-refuge>.

[6] Marr, Lori. Facebook. Video. March 26, 2020.
<https://www.facebook.com/lorimarr.freedomfairy/videos/10219814767671813>.

[7] Jennings, Sydney. "COVID-19 Update: Global Confirmed Cases as of March 26, 2020." *Patient Care Online*, March 26, 2020. <https://www.patientcareonline.com/view/covid-19-update-global-confirmed-cases-march-26-2020>.

[8] Marr, Lori. Facebook. Video. April 2, 2020.
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[14] Blanchard, Nichole. "300 people called dispatch after Meridian playground arrest — some with insults, threats." *East Idaho News*. May 20, 2020.

<https://www.eastidahonews.com/2020/05/300-people-called-dispatch-after-meridian-playground-arrest-some-with-insults-threats/>.

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EXHIBIT S

Contact People's Rights

If you need **help with this website**, please contact us using the information below. Help us build the largest neighbor-network to defend the People's Rights.

If you need immediate **help to defend your rights**, please login to the site and contact your Area Assistants directly.

Address

PO Box 370
Emmett, ID 83617

EXHIBIT T



What to Do When Someone Needs or Asks for Assistance in Defending Their Rights

UPDATES 1

People's Rights is a network of united neighbors assisting each other in defending their rights. The network is growing and more people are uniting daily. So, what do we actually need to do when someone needs or asks for help? This article should help you know what to do and the steps you should take to assist your neighbor.

Info Jan 14, 2021 Feb 1, 2021

3,769 4,763 1

[Idaho 1N](#), [Idaho 2](#), [Idaho 4NE](#), [Idaho 4NW](#), [Idaho 4SE](#), [Idaho 4SW](#), [Idaho 5](#), [Idaho 6](#), [Idaho 7](#), [Idaho 8](#), [Idaho 9](#), [Idaho 10](#), [Idaho 11](#)

Share (Alt)

What should you do when someone needs or asks for assistance in defending their rights?

The first thing any one should do before taking action to assist someone in defending their rights is determined if the person *wants* you to assist them or not. (Remember, it is *their* right that is being violated, not yours.) There are situations when the person cannot communicate and you will need to determine if you are going to assist them anyway These situations may include the person is being detained or incapacitated in some way. If the person does not want you to assist them, they *YOU should not*. If the person does, and has communicated this desire to you, then the following steps and actions should be considered:

1. **Assess if the person's rights are legitimately being violated or threatened.** Answer the question, 'Is the person's life, liberty or justly-acquired property being taken or controlled by someone else?' (Remember, a person's life and body is their property, and so is their liberty). If the answer is **YES**, then go to the next step. If the answer is **NO**, then do nothing.
2. **Determine who the perpetrator is.** Answer the question, 'Who is the person(s) violating the right(s)?' (Remember, to have a crime, there must exist both a victim and a perpetrator.) Determining the victim and the perpetrator is one of the most important processes you must work through before assisting someone in defending their rights. You must be *impartial* in determining who the bad actor(s) is/are. We must NOT become a people that falsely accuse or act rash. We must be objective, and not allow emotions to dictate "the truth". Finding the perpetrator(s) involved in a situation may take some effort. Remember, if a person participates in the unjustly taking of someone else's life, liberty or property then they are the perpetrator. A perpetrator cannot be a group, such as "the government", a entire corporation or a collection of nameless or unknown people. Perpetrators can only be *individual* people, acting on their own, or in direct and immediate cooperation with other *individual* people. You will need to find the individual or individuals that are most culpable and focus your efforts towards them. Once you have

identified who the victim and perpetrator(s) are, **CONTINUE** to the next step.

3. **Determine if the violation involves the law.** Answer the question, 'Is 'the law' being used to violate the persons right(s)?' If the answer is **YES**, then go to the next step. If the answer is **NO**, then skip to **Step 5**.
4. **Determine if due process has been granted.** Answer the question, 'Has the person been given JUST due process of law?' Just due process of law can *only* be accomplished by the People, not those that work for government. Constitutional due process culminates with a jury of the People, during a fair, public and speedy trial. A judge may help administer the process, but it must be the jury (the People) that determines guilt, *not* a judge, prosecutor or those working for the government. So, has the person received JUST due process? If the answer is **NO**, go to the next step. If the answer is **YES**, then do nothing.
5. **Determine if the threat is imminent.** Answer the question, 'Is a violation of the person's right(s) immediately happening or about to happen?' If **YES**, then go to the next step. If **NO**, then skip to **step 7**.
6. **Immediate action necessary.** When a threat is imminent you should activate the People's Rights Network and inform those in the local Area to act in the physical defense of the person as quickly as possible. This does not necessarily mean violence will be needed. There are many *peaceful* ways to unite and act in the physical defense of a person - do everything possible to defend without using excessive force. If the violation warrants force, and non-peaceful measures are required in order to defend the victim, then the *least* amount of force necessary should be used to secure the person's right(s).
7. **Rights are secure or stable.** As soon as the right is secure or at least stable, then *personal* accountability must be communicated to, and placed upon the most culpable perpetrator(s). Personal accountability is what changes the direction of a perpetrator. The more personally accountable the perpetrator(s) feel for violating a right, the more likely they will be to discontinue the violation. However, before any direct action against the perpetrator(s) can be taken, you must perform the next step.
8. **Notice to Cease & Desist.** You must give **NOTICE TO CEASE AND DESIST** to those responsible for violating, or will be violating the right(s) of someone else. Before any imminent action is taken, the perpetrator(s) should be given the opportunity to understand, stop and to correct their actions. Official notices are accustomed to natural law, common law and are biblical. The notice should be officially served, sent through certified mail or hand-delivered while being recorded. ([See example of Notice to Cease & Desist in Update 1 below](#)).
9. **Increase personal accountability.** If the perpetrator(s) does not end the violation(s) after receiving the Official Notice; here is a partial list of things that can be done to put personal accountability upon a perpetrator(s):
 - Create a 1-4 page chronological summary detailing the perpetrator(s) violation(s), send it to him/her *and* make it public (this is one of the most effective tools needed). See Examples: [Bugli Family](#), [Hammond Family](#), [Rick Koerber](#)
 - Post on social media giving accurate evidence and links of the perpetrator(s) violation(s).

- File a report with the County Sheriff's Office and officially have the perpetrator(s) served with the report.
- Activate People in the Area (People's Rights Network) and demonstrate at the perpetrator(s) house(s).
- Pass out accurate information (flyers) of the violation(s) to the perpetrator(s) neighbors.
- Contact the perpetrator(s) supervisor at his/her place of income and explain the perpetrator(s) violation(s).
- File a complaint in the local or federal court and have the perpetrator(s) served with the court documents.
- Contact the perpetrator(s) church and inform his/her ecclesiastical leader of the violation(s).
- Activate People in the Area and demonstrate at the perpetrator(s) place of income.
- Write or run ads in the local newspaper explaining the perpetrator(s) violation(s).
- Ponder and pray about other ways to put *personal accountability* on the perpetrator(s) and then act on it.



10. **Violations continue.** If the perpetrator(s) does not end the violation(s) after the above actions have taken place, then.....We the People have no mechanism to bring justice, so we must build it.(See the Justice System)

[View 1 Comment](#)

NOTICE TO CEASE AND DESIST (FORM)

UPDATE 1

Jan 20, 2021 Jan 23, 2021

[Permalink \(Alt\)](#)

NOTICE TO CEASE AND DESIST

From:

__[Victim's Name]_____

To:

__[Perpetrator's Name]_____

__[Home Address]_____

__[Phone Number]_____

__[E-Mail]_____

Date:

Re: [Summarize damages and violations]

Dear _____[perpetrator]_____,

This letter has been served as notice of your unwarranted harassment activities, or the equivalent thereof, that has been on-going in recent weeks.

Therefore, you are required to cease and desist all acts, including but not limited to:

If you do not cease all related acts, lawful personal accountability will be commenced against you. This may include but not limited to:

Posting on social media giving accurate evidence and links of your violation(s); Filing a criminal report with the County Sheriff's Office; Activating People to demonstrate at your home; Passing out accurate information (flyers) of your violation(s) to your neighbors; Contacting your supervisor at your place of income to explain your violation(s); Filing a violations warning in the local or federal courts; Contacting your ecclesiastical leader to inform them of your violation(s); Activating People in the Area and demonstrate at your place of income. Run ads in the local newspaper explaining your violation(s).

Due to the aforementioned harm you have caused me, this cease and desist shall serve as a pre-suit letter demanding that you provide me written assurance within 5 days that you will refrain from further actions that could be deemed as a continuance of the violation(s).

If you do not comply with this cease and desist letter within the aforementioned time period then a lawsuit may be filed in the proper jurisdiction (federal, state or common law) seeking monetary damages as well as pursuing all available lawful remedies for your personal actions against me.

Sincerely,



Attachments

notice-to-cess-and-desist.docx (15 KB)

[View 1 Comment](#)

EXHIBIT U

Erik F. Stidham (ISB #5483)
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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 CHRIS ROTH IN
SUPPORT OF MOTIONS FOR LEAVE
TO AMEND COMPLAINT TO ALLEGE
PUNITIVE DAMAGES**

REDACTED

I, Chris Roth, declare and state as follows:

1. I make this declaration based on my personal knowledge.

2. I am a plaintiff in this lawsuit against Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and the People's Rights Network (collectively "Defendants").

3. I am the President and CEO of St. Luke's Health System, LTD ("St. Luke's"), an Idaho-based, not-for-profit, regional health system with over 14,000 employees.

4. I am not a doctor, and I do not have a medical degree. My job is to organize and administer the hospital network. I do not make individual patient care decisions. As an employee of St. Luke's, I am not an agent or employee of the Idaho Department of Health and Welfare ("DHW") or any other government entity.

5. The mission of St. Luke's is to improve the health of people in the communities we serve. As a not-for-profit health system, St. Luke's is dedicated to providing quality care to every person who comes through our doors. In its 2021 fiscal year, St. Luke's served more than 576,000 unique patients in over 4.2 million patient encounters.

6. On March 12, 2022, I first became aware of a controversy about the admission of a ten-month-old infant (the "Infant") to St. Luke's. I now 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 understand that eventually the Infant was admitted to St. Luke's hospital in Boise.

7. The issues relating to the custody of the Infant were handled by DHW and the judicial processes that apply in these cases. To the best of my understanding, when DHW intervenes on behalf of a child who needs medical care, DHW, subject to the judicial processes, determines whether the parents or guardians retain custody of the child.

8. Consistent with its mission to improve the health of the people in the communities we serve, St. Luke's provides medical care to everyone who comes in, including minor children brought in by DHW or law enforcement. When a child is brought in by DHW or law enforcement, St. Luke's does not determine who has custody of a child or when the child can be released to the parents; those determinations are made by DHW or a judge. St. Luke's just treats the child and provides information to DHW consistent with legal requirements.

9. St. Luke's provides medical treatment to those who come through its doors regardless of whether those patients are insured or are able to pay.

10. St. Luke's does not receive any compensation from some of the patients it treats and does not receive payment sufficient to cover the cost of care for many of the patients it or its providers treat. When people come to St. Luke's, the health care providers focus, first and foremost, on providing the proper care and treatment, without regard to ability to pay.

11. While St. Luke's is a non-profit organization, it must operate in an economically efficient way in order to fulfill its mission. It needs to provide its services and collect revenue for those services in a way that is financially viable. St. Luke's needs to cover the costs of providing the services, invest in capital expenditures to improve care, generate sufficient funds to reinvest in the community, and expand and adapt to fulfill its mission to a rapidly increasing population. In turn, when the Defendants in this lawsuit caused St. Luke's to suffer negative financial impacts, the losses and costs were as real and as impactful to St. Luke's as the losses and costs would be for any for-profit business, with consequences impacting the community it serves rather than owners or shareholders.

12. Defendants falsely stated that I played some role in the determinations relating to the Infant. I had no contact with the police or DHW or the courts about the Infant at any time. I played no role in any determinations made by DHW or the court relating to the Infant.

13. My understanding is that St. Luke's discharged the Infant on March 15, 2022. I took no part in the decisions to admit, treat, or discharge the Infant.

14. St. Luke's has an emergency response process when dealing with emergency situations called incident command. Given Defendants' actions, I understand that St. Luke's Boise Medical Center ("St. Luke's Boise") implemented incident command on Saturday, March 12, 2022. I also directed incident command from the system level. This involved approximately twelve hours on March 12, 2022, in which incident command responded to ongoing reports monitoring the protests instigated by Ammon Bundy, Diego Rodriguez, and the other Defendants. We continued incident command for approximately two weeks because we could not be certain—even after the Infant had been discharged from St. Luke's—that our employees and patients were safe. If, for instance, law enforcement or CPS brought the Infant back to St. Luke's, we needed to be ready to respond to the armed mob again.

15. For the leadership team in Boise, it was "all hands on deck," as dealing with the disruption and threats caused by the Defendants was all consuming. It was as if we were running a hospital while under attack. We needed to deal with crowds of the Defendants' followers menacing our employees and patients with intimidating behavior and verbal threats. Our phone lines were being overloaded with disruptive, foul messages, including death threats. Some of the Defendants' followers who were entering the hospital posing as patients or visitors needed to be removed from the building. And, perhaps most concerning, we were hearing from our security

team and law enforcement significant concerns that the armed mob might storm the hospital and attempt to take the Infant by force.

16. I understand that the website www.freedomman.org has made a number of false and defamatory statements about St. Luke's, including, but not limited to, that: (a) the Infant "was being neglected by the hospital!"; (b) St. Luke's "gleefully participate[s] in the Child Trafficking Network known as CPS by taking children into their hospital to receive never-ending streams of payments from Medicaid and other government sources in order to give faulty and unreliable information to the 'family courts' in order to keep children away from their parents"; (c) "St. Luke's is probably the number one accomplice in this Child Trafficking system—and they profit as much as anyone from the system"; (d) "The story and actions of all bad actors, including police officers, politicians, St. Luke's hospital, nurses, doctors, the prosecutor, the judge, and other bureaucrats have been so egregious, tyrannical, and demonstratively ILLEGAL, that the story has made national and even international news, and has been featured by news outlets all over the country—with some believing that this is now the highest profile CPS kidnapping case in American history"; (e) "St. Luke's is HARMING [Infant] . . . I REPEAT—ST. LUKE'S HOSPITAL IS HARMING [Infant]!!!"; (f) "THE HOSPITAL IS DOING GREAT HARM TO [Infant]!!!"; (g) "These moronic imbeciles at the hospital aren't taking care of [Infant]"; (h) Infant's "health is deteriorating BECAUSE OF [St. Luke's]"; (i) Infant "is being neglected by the hospital!"; (j) "St. Luke's has demonstrated itself to be unhelpful, tyrannical, and in many ways incompetent"; (k) "[E]verything CPS, the police, and St. Luke's did to [Infant] was detrimental and harmful to his health. And that is empirical and not just my opinion."

17. All of these statements are false. Contrary to the false narrative manufactured by the Defendants in this case, St. Luke's is not part of a child trafficking ring. St. Luke's did not

kidnap or traffic or abuse the Infant, as Ammon Bundy, Diego Rodriguez, and the other Defendants have stated and insinuated. The hospital treated the Infant as it would any other child brought to it for care. As detailed in the medical records provided to the Infant's father, the Infant was well cared for and had been admitted to the hospital on March 12, 2022 due to [REDACTED].

18. I understand that the website www.peoplesrights.org accused me of being a criminal accessory to child abduction. This is false. The Infant was not abducted. The Infant was taken into custody by police and state authorities through legal means. Further, I played no role and took no action relating to the child being taken into custody. I have not spoken to any law enforcement, DHW employee, or judiciary officer about the Infant. I have not harbored or protected any person who committed a felony relating to the Infant.

19. The false accusations of being a criminal accessory to child abduction on the www.peoplesrights.org website caused and continue to cause reputational harm to St. Luke's and me. False statements that the CEO of St. Luke's is engaging in the criminal abduction and harm to children seek to impair my ability to lead the organization and work in the community on behalf of St. Luke's. This is especially the case given that caring for the health of children in the communities we serve is a core part of St. Luke's mission.

20. Further, the false statements regarding me are intended to damage St. Luke's as an institution. A false statement regarding the CEO necessarily indicates the institution is involved in criminal activity.

21. I am being targeted for harassment. The false accusations on www.peoplesrights.org clearly are made to intimidate me and seek to cause emotional distress to me and my family.

22. The false statements have caused me to be concerned about the impact the harassment will have on the institution that I lead and cause me concern regarding the safety of my colleagues and my family.

23. Because of the defamatory statements and actions by the Defendants in the lawsuit, I have taken steps to protect my family from harm. Those steps include, but are not limited to, increasing security measures for my household. I have spent in excess of \$3,000 on security for my home since Defendants began their campaign of harassment in March 2022. I incurred those costs because of the Defendants' actions. I am concerned that Defendants' false statements will incite their followers to some act of violence against me or my family. I also consulted with law enforcement about how best to protect my family and monitor the situation.

24. St. Luke's has had to take steps to protect its providers and other medical staff. For instance, all profiles of the pediatrics team (20 individuals) were removed from the St. Luke's website shortly after the lockdown, a measure I believe we have been forced to take in reaction to the armed protests in March, instigated and incited by Defendants.

25. There have also been significant disruptions to, and burden placed on, St. Luke's business due to Defendants' protests and false statements. In turn, St. Luke's has experienced significant negative impact. The protests diverted many staff and executives from their job responsibilities to dealing with the security threat, prevented patients from seeking or obtaining care, and intimidated and distracted the hospital providers and staff who should be able to focus on their purpose of providing the highest quality care to those who come to them. St. Luke's Boise had costs that were wasted because it had to divert its resources to dealing with the disruptions caused by the physical threat to its patients and staff and telephonic threats. The disruptions are not limited to the hours during which the hospital was on lock down. During the

several days in question, the hospital's operations were repeatedly disrupted. It costs a great deal of money to operate our hospital system. To provide a frame of reference, I understand that the estimated average hourly cost of operating our system is about \$320,000. Further, the disruptions imposed human costs. Many St. Luke's staff members reasonably feel their safety is threatened and question their willingness to continue serving in their roles.

26. Defendants' false statements have caused confusion to the public about St. Luke's mission and the care it provides the community. Due to Defendants' false statements, St. Luke's has had to expend resources on public relations support to mitigate damages relating to the misconceptions about St. Luke's that Defendants have caused. In addition to the financial impact to St. Luke's, Defendants' defamation may put people at risk. For example, parents may not seek needed care for their children if they somehow believe Defendants' lies that St. Luke's secretly vaccinates children and engages in child trafficking. Defendants' wrongful conduct and the false statements will have long-term effects on St. Luke's and its mission.

27. In the 32 years of my career in healthcare, I never imagined that a non-profit hospital could or would be attacked the way Defendants have done—using armed threats, intimidation, doxing, and a campaign of falsehoods to disrupt the hospital's ability to provide medical help to the community it serves. I respect the right of community members to peacefully demonstrate, but the events in March were not peaceful demonstrations. They were armed protests that put the safety of everyone in St. Luke's Boise at risk. I believe it is important that St. Luke's stands up to the bullying, intimidation, disruption, and self-serving and menacing actions of the Defendants, for the protection of St. Luke's employees and patients, and to ensure St. Luke's ability to serve the community. Inaction would signal that this type of behavior is acceptable in our community. It is not.

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/ Chris Roth

Chris Roth

CERTIFICATE OF SERVICE

I hereby certify that on this 6th 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:

DECLARATION OF CHRIS ROTH IN SUPPORT OF MOTIONS FOR LEAVE TO
AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES - 10

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

20181785_v2

EXHIBIT V

Erik F. Stidham (ISB #5483)
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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 DENNIS MESAROS
IN SUPPORT OF MOTIONS FOR
LEAVE TO AMEND COMPLAINT TO
ALLEGE PUNITIVE DAMAGES**

REDACTED

I, Dennis Mesaros, declare and state as follows:

1. I make this declaration based on my personal knowledge.
2. I am the Vice President, Population Health, for St. Luke's Health System, Ltd.

("SLHS"), and serve as the regional operational leader for St. Luke's Regional Medical Center

**DECLARATION OF DENNIS MESAROS IN SUPPORT OF MOTIONS FOR
LEAVE TO AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES - 1**

("SLRMC"), St. Luke's Elmore Medical Center, and St. Luke's McCall Medical Center. I refer to SLHS and SLHS collectively as "St. Luke's." As part of my job duties, I am accountable for the quality of care, patient outcomes, patient experience, stewardship, and the safety and wellbeing of staff, and patients. As the accountable leader, I am sometimes called upon to respond to emergency situations and events that impact hospital operations. I am a resident of Boise, Idaho.

3. On the morning of Saturday March 12, 2022, I received a call from Ms. Marle Hoff, the Chief Operational Officer of SLRMC and my direct report. During this phone conversation with Ms. Hoff, I was informed that, late on March 11, 2022, a [REDACTED] infant ("Infant") had been taken to St. Luke's Meridian Medical Center's hospital emergency department under the authority of the Department of Health and Welfare ("DHW") and Meridian police. I was informed that a mob led by Ammon Bundy arrived St. Luke's Meridian and, without any legal authority, demanded that the Infant be turned over to Bundy. I was informed that Bundy and his mob were trespassing and blocking the ambulance bay in Meridian and Bundy had been arrested by the police for trespass owing to his refusal to leave and move his mob from the ambulance bay. I was also informed that, because the Infant's condition [REDACTED], the Infant had been transferred to SLRMC to be admitted to the Children's Hospital. It was also relayed that our Security group had learned additional protests were planned for the SLRMC campus.

4. Upon hearing this update, it was determined the protests (which had resulted in arrests the night prior) had the potential to disrupt patient care and threaten the safety of our patients and staff. As a result, I went to the hospital to oversee incident command. I am

formally trained in emergency management through the Federal Emergency Management Agency.

5. St. Luke's did not make any decisions regarding whether the parents of the Infant could visit the Infant. DHW oversaw and made those decisions. DHW always makes those decisions in situations where a child is brought to our hospitals for medical care under the authority of DHW or law enforcement. Additionally, given the Infant was brought to the hospital by DHW, the Infant was listed as a Do Not Publish ("DNP") to ensure the privacy of the patient and family. The DNP status restricts information that is shared internally (information is shared only with caregivers) and externally. In this instance, DHW and law enforcement were consulted to coordinate all visits. Further, Meridian law enforcement had advised that precautions and safeguards to protect the Infant should be put in place because of concerns that the parents of the Infant or the mob being directed by Bundy and Diego Rodriguez might attempt to take the Infant back by force during visitation or at some other time. Law enforcement recommended a safety plan and visitation parameters be established and agreed to by the family in advance of visitation. The elements of the safety plan and parameters included (1) having the visit occur away from an inpatient unit, (2) requesting no firearms be carried into the facility, (3) respecting visitation policies (i.e., masking and limitations on number of visitors), and (4) having a clinical person from SLRMC present to provide care due to the fragile state of the Infant and to assist the mother of the Infant with breastfeeding and care of the Infant during the visit.

6. Throughout the day the mob outside grew in "volume." We became aware that the Infant's earlier care team was being doxed on Rodriguez's website and elsewhere, at the direction of Rodriguez and Bundy. We were also aware that Bundy and Rodriguez were continuing to direct their followers to go to SLRMC. Some of the members of the mob outside

the hospital were visibly armed. Evidence that the mob had been fed lies was indicated on signs that stated SLRMC had kidnapped the Infant and was participating in child trafficking and that SLRMC was preventing the Infant from feeding.

7. This mob activity was a threat to the caregivers as we all were aware of the fear/safety concerns that were being provoked by the mob and false statements from Rodriguez and Bundy. Direct impacts of the activity included the reluctance of emergency medical crews from transporting patients to SLRMC. I understand that on numerous occasions, ambulance teams voiced concerns of potential gun violence.

8. We engaged in efforts to keep the parents of the Infant updated on the Infant's health and care. Via audio calls, the parents were given direct contact with the clinician team who were treating the Infant. We were committed to providing the parents ongoing updates on the Infant's condition and to coordinating with the mother to obtain her breastmilk for the Infant.

9. At some point the parents became concerned that SLRMC was going to give the Infant a Covid vaccination without the parents' consent. We noted the false postings from Rodriguez that portrayed the existence of a conspiracy to vaccinate the Infant without parental consent and evidence indicating the Infant had been vaccinated. We repeatedly assured the parents that this vaccination conspiracy peddled by Rodriguez was false. We assured the parents that we would not vaccinate the Infant.

10. On March 13, 2022, protestors returned to SLRMC at the direction of Rodriguez and Bundy. As we were aware that followers were being directed again to SLRMC, the incident command team had assembled earlier in the morning to ensure caregivers and patients could access the facility, to mitigate and respond to threats from the mob, and to continue coordination of a parental visit with the Infant.

11. Because of the actions of Bundy, Rodriguez, and their followers, members of the pediatric care team were understandably concerned about their safety. In turn, we took steps to limit exposure of the pediatric care team. The steps taken included removal of ID badges, taking down pictures of team members from the walls, removing team members' names from documentation, and taking care when releasing the names of team members to the public.

12. An update from the Security team indicated an alarming trend of telephone calls coming into SLHS inquiring about the status as well as an increasing number of threats against SLHS caregivers and administrative team. We were aware that Rodriguez and Bundy were directing their followers to call and disrupt SLHS. This directive, combined with the false statements, not surprisingly resulted in a large number of serious threats being made. I have reviewed some examples of the phone threats made to St. Luke's employees. *See, e.g.,* Declaration of Marle Hoff in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages, at Exhibit A (filed concurrently herewith). Some examples of the types of threats received are referenced below. To avoid disclosure of the phone numbers of callers, I have not included the last digit for the numbers. The following are some examples:

- "I'll fucking kill you" (caller 2673493x)
- "If that baby is not returned to its mother there is going to be hell to pay" (caller 2673998x)
- "Groups are going to be coming . . . we're coming" (caller 26744320xx)
- "The governor of this state should be shot" (caller 208869213X)
- "Your hospital is disgusting" "kidnapping of a child your hospital is responsible for" (caller 310951071x)
- – "It's disgusting what this hospital is doing to this baby" "sex trafficking" "you are responsible for that" (caller 310951071x)
- "How about you give that baby an enema you baby killers? what is wrong with you morons? you are going to pay for this." (caller 72036196x)
- "If anything happens to your child your ass is dead" "you will be put in jail and executed" "this is fucking unbelievable" "if you send that child to child protective services your ass is dead" "I am so fucking pissed off at you people right now, you have no right to be alive." "Fuck you people" (caller anonymous)

13. These calls were in the thousands and interfered with patient care activity, including activities ensuring patients could access the facility for needed treatments (e.g., cancer care infusions) and people being able to visit patients at SLMRC. Further, the team members who had to receive this barrage of threats were placed under a tremendous amount of stress.

14. On March 13, 2022, the attending physician had another call with the parents. This call was not productive; the parents were not engaging with the attending physician in a productive way but instead were continually challenging on her credentials, treatment plans/recommendations and overall treatment of the Infant and were implying threats. Given the challenging and threatening nature of the call, the decision was made to make the Chief Medical Officer, Frank Johnson, M.D., the point of contact for the parents of the Infant in the hopes those communications would be more productive for St. Luke's and the parents.

15. By the end of the day on March 13, 2022, a private visit between the parents and the Infant was facilitated. The visit occurred in the surgical waiting room (off hours) to allow privacy between the parents and the Infant. Although the parents did not comply with some of the visitation requirements (i.e., masking), grace was provided, and the policy was not enforced. My understanding is that during that visit, the parents surreptitiously took photos of the Infant while he was resting and from unflattering angles. By the next day, the photos of the Infant were posted on Rodriguez's website with additional propaganda that mischaracterized the Infant's treatment and condition. On his website, Rodriguez falsely claimed that the photos were evidence of the alleged diminished health of the Infant since he had been admitted to SLRMC on March 12, 2022. In contrast to the false statements made by Rodriguez that the Infant was in

perfectly good health when he came to the hospital, the Infant's medical records indicate the Infant came to the hospital [REDACTED].

16. One of the frustrating aspects of this course of events was that St. Luke's could not put out any statements about the truth of the situation because they would have involved the protected, personal health information of the Infant. To the contrary, although the Infant had [REDACTED] causing or contributing to [REDACTED], within our care, the Infant was [REDACTED]. The actions of the parents, Bundy and Rodriguez continued to incite and solicit the crowd into violence and raise the fear level of the caregiver team and raise ongoing safety concerns of the SLRMC staff and patients under our care.

17. On March 14, 2022, as a Monday, healthcare activity was greater with elective care and treatments scheduled. The protests at the St. Luke's Boise campus continued with substantial impact on patients, visitors, and caregivers being interfered with as they attempted to access the hospital. At times there were hundreds of people gathered around the hospital, shouting at the employees and anyone else who tried to enter the building. Many protesters had firearms. The crowd was menacing, and I was worried for the safety of everyone in the hospital. Threats continued to flood the phone lines.

18. The parents continued to receive medical updates, and breastmilk continued to be provided for the Infant. We were aware of the court hearing scheduled for the following day, Tuesday March 15th at 1:00 p.m. and initiated planning, anticipating the Infant would be [REDACTED] for discharge, regarding how the Infant would be released to either the parents or to DHW. An update from the Threat Assessment team indicated a severe risk to SLHS if the Infant was not returned to the parents. We reached out to DHW for assistance in planning the logistics of the Infant's care in either event.

19. On March 15, 2022, the Infant's father entered the hospital and requested the Infant's medical records. St. Luke's regularly provides medical records upon written request, but such requests take some time to process (typically we provide medical records within 24 hours). The Infant's father refused to leave unless he received the medical records. St. Luke's did its best to respond promptly and provided records after hospital provider and staff names were redacted from the records for their safety given threats. After the names were redacted, the records were provided to the Infant's father, and he left the building.

20. The Threat Assessment team continued to monitor communications being directed by Rodriguez and other defendants. We learned that there were discussions that raised a credible threat that if the parents did not receive custody at the close of the court hearing, there would be an effort by Rodriguez, Bundy, and their followers to forcibly remove the Infant from the hospital to return to the parents. At this point, I asked all non-essential staff near the lobby to leave the hospital. The mob continued to grow in size and agitation. We continued to work with DHW on discharge planning. Within minutes of Rodriguez posting to his followers that DHW would maintain custody of the Infant, the mob grew at a quick pace. Many in the mob of protesters were making a show of the fact that they were armed. Given the risk, DHW was asked to take physical custody of the Infant. The Boise Police Department ("BPD") sent officers to assist in protecting the hospital.

21. Within moments of the end of the hearing, the mob approached and attempted to enter the hospital. Working with BPD, the mob was asked to move back from the hospital. As the mob became more aggressive, we had to enact a "lockdown." In a lockdown, all individuals (whether staff, patients, or visitors) are prevented from entering or leaving the facility. This means that an individual approaching SLRMC for emergency care would not be able to enter the

hospital. Patients missed appointments and procedures, and staff could not go home. Emergency vehicles continued to be diverted away from SLRMC. The largest hospital in the State of Idaho, which includes the only children's hospital within the state, was forced to shut down operations due to the safety threat posed by the mob. I have never seen or heard of a lockdown of a hospital in my 30-plus years of hospital administration.

22. As this was occurring, the Infant was discharged to DHW, and the agency took physical custody of the Infant. The situation remained tense.

23. Eventually, once the Infant was safely with DHW, BPD announced to the protesters that the Infant had left the hospital. After that, the mob did start to decrease in size, although some protesters continued for the next couple days.

24. The experience with the March protests has affected the hospital providers' and staff's morale. St. Luke's prides itself in serving the community and caring for the community's health. I never imagined that we would become the target of a smear campaign that not only spread misinformation about the hospital, confusing patients and the community, but also that the campaign would escalate to a life-threatening situation like it did. For myself, I no longer wear my St. Luke's name badge in grocery stores or other public places, nor do I tell strangers where I work in case they are followers of Ammon Bundy or Diego Rodriguez. My safety has been compromised by Bundy, Rodriguez, and the other defendants.

25. St. Luke's was adversely impacted by the disruptions caused by the trespass at the Meridian hospital on March 11, 2020, the actions of the mobs at the SLRMC, and the barrage of threatening phone calls. St. Luke's services and business operations were disrupted or made more challenging owing to the wrongful actions and false statements by the Defendants.

26. To give a sense of the scope of St. Luke's operations, each day that the hospital operates, there are thousands of patient encounters. Each day that the hospital operates, St. Luke's expends millions of dollars in costs to provide service. Each day that the hospital operates, especially on weekdays when more operations are scheduled, we must recover millions in revenue, sometimes more than \$8,000,000 in revenue just so that we can meet our obligations. It is a massive, daily operation that was disrupted and shutdown by the conduct of the Defendants to the detriment of the people we serve.

27. I understand the quantification of the damages is ongoing. While the calculation process is ongoing, the impact to the SLHS was very real. A non-exclusive list of the impacts and burdens includes the following:

- Appointment cancellations, delays in care, and disruptions to services. As a result of the March protests and threats of violence, St. Luke's patients were burdened as their access to the hospital was made more difficult and stressful for several days. Some providers and staff were sent home. Patients and visitors were denied access during the lockdown.
- Emergency Department lost volume and loss of patient access. Individuals were diverted from care at St. Luke's Emergency Department due to the lockdown and access issues caused by the protesters.
- Loss of public access to phone system and distress to St. Luke's employees who received the threat. Individuals from approximately 30 different states were called on by Bundy, Rodriguez, and others to flood the St. Luke's public phone system. As a result, St. Luke's was unable to take calls from the public, including potential and current

patients for hours at a time. As reflected above, St. Luke's employees were subjected to threats of violence, including death threats. (See paragraph 25).

- Increased costs of security measures and security infrastructure. The threat posed by the protestors and online activities of Bundy, Rodriguez, and the other defendants required St. Luke's to add security measures through the duration of the protests and on a continuing basis thereafter. Increased security during the time of the protests also diverted security resources from St. Luke's Meridian. The continuing threat to St. Luke's patients and staff posed by the ongoing, false child trafficking narrative has led to St. Luke's decision to make additional securities infrastructure investments.
- Impact to recruiting. The March protests were widely publicized by media. The information available to potential recruits for positions within the St. Luke's health system has had a negative impact on recruiting efforts. I personally experienced the impact of the March protests when I was recruiting a pathologist for a potential position at St. Luke's Boise. The pathologist mentioned Bundy and the protests and in no uncertain terms said he was not interested in working at St. Luke's in Boise because of the potential threat and disruption to his ability to practice medicine without facing unfounded backlash.
- Impact to St. Luke's reputation as a health care system. The publicized comments by Bundy, Rodriguez, and the other defendants are contrary to the public-health focused mission of St. Luke's, which is: "To improve the health of people in the communities we serve." The comments undermine the trust St. Luke's patients and potential patients have in St. Luke's and its providers. The March protests and the surrounding and ongoing

comments from Bundy, Rodriguez, and the other defendants have frustrated and continue to frustrate St. Luke's ability to serve the health needs of the community.

- Impact to patient relationships. Since the time of the March protests, we have removed provider information from our public-facing websites and have removed identifying provider information from the hallways of our facilities. These actions necessarily reduce the quality of the connections between healthcare providers and their patients, which has in turn impacted St. Luke's relationship with its patients at large.

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

Executed this 6th day of December, 2022.

/s/ Dennis Mesaros

DENNIS MESAROS

CERTIFICATE OF SERVICE

I hereby certify that on this 6th 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:

**DECLARATION OF DENNIS MESAROS IN SUPPORT OF MOTIONS FOR
LEAVE TO AMEND COMPLAINT TO ALLEGE PUNITIVE DAMAGES - 13**

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

20105229_v2

EXHIBIT W

https://www.idahopress.com/news/local/bundy-group-peoples-rights-training-to-defend-from-government-force/article_fdf76b0a-2e2a-53f0-89e9-8c877c647bab.html

Bundy group, People's Rights, training to defend from government 'force'

By RYAN SUPPE and TOMMY SIMMONS newsroom@idahopress.com
Dec 15, 2020



In this screenshot of a web-streamed meeting, activist Ammon Bundy speaks to members of People's Rights, a conservative group that opposes coronavirus mandates: an Emmett warehouse on Dec. 10.

YouTube screenshot

BOISE — On Thursday, dozens of people assembled in an Emmett warehouse to prepare to defend themselves from an armed conflict with the government, which they believe is imminent.

Ammon Bundy, a conservative activist known for leading armed standoffs with government agents, led the meeting of People's Rights, a group he founded earlier this year to organize against government coronavirus mandates.

This year, the group has protested — mostly peacefully although not always — at health districts; at the homes of public officials; at this year's special session of the Idaho Legislature; and at police agencies that have cited or arrested its members.



Throughout Thursday's meeting were ominous references, by Bundy and others, to an escalation of conflict and the need to prepare "before the world comes to an end." Ahead of the meeting, a text message from the People's Rights online network administrators suggested the group needed to prepare for "the force that is evident to come upon us."

The meeting followed the arrest two days prior of a People's Rights member, who was charged with disturbing the peace while protesting at the home of Diana Lachiondo, a member of Central District Health's board of health.

Weapons and ham radio training are among People's Rights' recent activities. On Thursday, Bundy encouraged members to train in small militia-style groups of two to 10 people.

Small groups are the "most effective" type of "warfare," he said.

Bundy, whose lectures are steeped in religious parable, implored People's Rights members only to use violence in defense, which is "righteous."

"It is never righteous to use it in offense," he said.

It's unclear what event or action would trigger armed defense by the group. In 2013, Bundy participated in an armed standoff — sparked by a conflict over public lands — with federal agents at his father's ranch in Nevada. In 2016, Bundy led another armed standoff with federal law enforcement at Oregon's Malheur National Wildlife Refuge, also sparked by a dispute over public lands. The 40-day standoff led to one death — LaVoy Finicum, a member of the occupation group, was shot by law enforcement during an arrest attempt.

Boise Police Department Deputy Chief Ron Winegar said on Monday that while the Boise Police Department doesn't monitor political groups, the department does have a liaison program that places officer liaisons with groups planning events in the city. He confirmed the department has a liaison with People's Rights.

Winegar said he didn't know specifically what the liaison officer had talked to People's Rights about, but in general, he said, liaisons explain the law to groups and how to abide by the law while still expressing their freedom of speech.

"What we do is we monitor public information and certainly information that comes to us," Winegar said. "If it relates to violence or advocating for violence against any specific individual or group or political entity that's very concerning for us. And so when we do come across that type of information or someone provides that to us then we certainly look to see if the violence aspect of that crosses the line into criminal activity. If it does, then we would take appropriate action."

Last week, the Boise Police Department issued two additional arrest warrants for protestors at Lachiondo's home. On Thursday, Bundy said protesting at the home of a public official is "very peaceful" and "very effective."

Exhibit W, Page 2

About halfway through Thursday's hourslong meeting, Bundy paused to allow people unwilling to or uncomfortable with "physically defending their neighbors" the opportunity to leave. He asked for a show of hands of attendees who have served in the military and been in combat.

"We are going to start to build a framework," Bundy said. "We're going to start building tools and organizing ourselves to be able to act."

Central District Health plans to meet again Tuesday, to consider further coronavirus safety mandates, after its meeting last week was foiled by protests.

THE ORDER

The Central District Health board on Tuesday will review a revised draft public health order released Dec. 5.

Find the agenda and a link to watch the 3:30 p.m. meeting at cdhd.idaho.gov, under the "Upcoming Events" section on the right side of the webpage.

The order would allow sports and visits to long-term care facilities in all four of the health district's counties: Ada, Boise, Elmore and Valley. Attendance at sporting events would be capped to 10 people, and masks and social distancing would be required.

As with the original draft, violations of the order would be punishable by a misdemeanor, which includes a fine, imprisonment or both; and visits to jails and prisons would be prohibited.

The order would enact a mask mandate in all four counties; currently only two of the district's counties, Ada and Valley, are under a mask mandate.

The draft order would also impact businesses in all four counties:

- Gyms, fitness and group exercises would be required to limit capacity to 50% and require 6 feet of social distancing.
- Dance floors and bar tops would be closed. Bars could only serve patrons seated at tables.
- When possible, businesses would need to implement delivery or curbside services.
- Restaurants would only be allowed to fill up to 20-30% capacity, depending on their size.

—*Thomas Plank, Idaho Press*

People's Rights wasn't the only group represented at last week's Central District Health protest, which had hundreds of attendees, prompted largely by a social media campaign ahead of the meeting by the Idaho Freedom Foundation, Idaho Liberty Dogs, Health Freedom Idaho and others. However, People's Rights was the only group to take credit for the protests at the homes of board members, an action other protesters condemned.

Winegar said the department is aware of another protest planned for Tuesday afternoon's Central District Health meeting. He said officers will be partnering with Idaho State Police troopers to police the scene and keep it safe. The department, he said, is apolitical — officers will be there simply to ensure the meeting can proceed in safety.

"We will take appropriate action if violence is committed," Winegar said.

EXHIBIT X

**People’s Rights Network –
Contempt of Protective Order - Summary of References to Individuals**

INDIVIDUAL	EXHIBIT CITATION	False Statement/Harassment
Aaron Dykstra	Exhibit F, Page 1	Falsely states “Hospital didn’t want to release baby because they are a business. (Of course not! “Check please!”) Dr. Dykstra threatened to call CPS if the Andersons left early.”
Aaron Dykstra	Exhibit F, Page 6	WANTED Aaron Dykstra, DNP, FNP-C, Pediatric Functional Practitioner... Child trafficking and abduction
Aaron Dykstra	Exhibit F, Page 9 - 10	Here are the criminals with a license to kidnap babies from their nursing mothers: Aaron Dykstra, Functional Medicine of Idaho
Aaron Dykstra	Exhibit F, Page 15	Doctor that Called in CPS.... Please light up his phone and fill his email with your thoughts... Dr. Aaron Dykstra is a pediatrician at Functional Medicine of Idaho. He initiated the horrific event that has led to the medical kidnapping of baby Cyrus. Call, leave messages, email, tell your friends and demand an explanation, immediately. This behavior is unacceptable! Phone: 1-208-385-7711, Email: Info@funmedidaho.com
Aaron Dykstra	Exhibit F, Page 16	PROTEST DAILY FOR BABY CYRUS... PROTEST DAILY! OUR PRESENCE AT DYKSTRA HOME AND FMI EAGLE, HIS PLACE OF EMPLOYMENT WORKED!!

**People’s Rights Network –
Contempt of Protective Order - Summary of References to Individuals**

INDIVIDUAL	EXHIBIT CITATION	False Statement/Harassment
Aaron Dykstra	Exhibit F, Page 17	<p>PROTEST DAILY FOR BABY CYRUS... PERPETRATOR – HI NEIGHBOR, Did you know that <i>our</i> neighbor...Aaron Dykstra, 1084 La Reata Way, Middleton, Idaho... recently decided that he had more authority over, and cared <i>more</i>, for young Cyrus Anderson than his own loving parents? Because they missed a <i>non-life-threatening</i> medical appointment, he ordered CPS to collude with local “Peace Officers” to abduct the child from his mother. <u>Neither father or mother has seen their child since.</u></p>
Dr. Erickson	Exhibit F, Page 9 - 10	<p>Here are the criminals with a license to kidnap babies from their nursing mothers: Natasha Erickson, St. Luke's Doctor (She was the first to call CPS simply because Marissa and Levi asked to leave St. Luke's after Cyrus first got his IV and was rehydrated. She threatened to call CPS if they decided to leave early, so Levi and Marissa stayed. She called CPS anyway . . . This was the initial trigger that got everything started.)</p>
Judge Fortier	Exhibit F, Page 8	<p>Be a Keyboard Warrior - ... send emails to Health and Wellness and demand that Baby Cyrus to home...lfortier@adaweb.net</p>

**People’s Rights Network –
Contempt of Protective Order - Summary of References to Individuals**

INDIVIDUAL	EXHIBIT CITATION	False Statement/Harassment
Judge Fortier	Exhibit F, Page 9 - 10	Here are the criminals with a license to kidnap babies from their nursing mothers: Judge Laurie Fortier (She is the unjust judge who is beyond corrupt and disgusting-who is responsible for destroying the lives of thousands of Idahoans and is directly responsible for the kidnapping untold numbers of children from the homes of good families. The depth of her wickedness and corruption will be exposed).
Judge Fortier	Exhibit F, Page 22 – 27 Exhibit F, Page 41 - 46	Come no more upon me, a warning letter from Ammon Bundy - To: ..., Chris Roth; ..., Erik Stidham; It took about 6 days to get baby Cyrus back to his parents. The people at the Idaho Department of Health and Welfare (CPS) and Judge Laurie Fortier did not like the public scrutiny they were receiving and gave baby Cyrus back after about a week of hundreds of people protesting at St Luke's Hospital, the CPS office and the Judge's home.
Jeff Fuller	Exhibit F, Page 9 - 10	Here are the criminals with a license to kidnap babies from their nursing mothers: Meridian Police Detective Fuller Badge# 3138 (He is the detective in charge of the case. He has the greater sin (John 19:11).
Jeff Fuller	Exhibit F, Page 16	PROTEST DAILY FOR BABY CYRUS... FULLER RESIDENCE 9606 Cherry Lane Nampa, 1:00AM - 12PM /3-8PM

**People’s Rights Network –
Contempt of Protective Order - Summary of References to Individuals**

INDIVIDUAL	EXHIBIT CITATION	False Statement/Harassment
Jeff Fuller	Exhibit F, Page 17	<p>PROTEST DAILY FOR BABY CYRUS... PERPETRATOR – HI NEIGHBOR, Did you know that <i>our</i> neighbor... Jeffrey Fuller, 9606 Cherry Ln., Nampa, Idaho... recently helped in the abduction of a young child, Cyrus Anderson, from the loving arms of his young mother? She was promised she would be able to remain with her son, but this was a complete lie, and once out of public eye, he took her child from her arms against her will. <u>Neither father or mother has seen their child since.</u></p>
Steve Hanson	Exhibit F, Page 9 - 10	<p>Here are the criminals with a license to kidnap babies from their nursing mothers: Meridian Police Detective Hanson Badge# 3534 (This is evil and wicked animal who ripped Baby Cyrus out of Marissa's arms. He is the actual KIDNAPPER.)</p>
Steve Hanson	Exhibit F, Page 16	<p>PROTEST DAILY FOR BABY CYRUS... Steve HANSEN RESIDENCE 6091 E. Path Dr. Nampa, 1 0AM - 12PM / 3 -8PM</p>
Steve Hanson	Exhibit F, Page 17	<p>PROTEST DAILY FOR BABY CYRUS... PERPETRATOR – HI NEIGHBOR, Did you know that <i>our</i> neighbor... Steve Hanson 6091 E Path Drive, Nampa, Idaho... recently helped in the abduction of a young child, Cyrus Anderson, from the loving arms of his young mother? She was promised she would be able to remain with her son, but this was a complete lie, and once out of public eye, he took her child from her arms against her will. <u>Neither father or mother has seen their child since.</u></p>

**People’s Rights Network –
Contempt of Protective Order - Summary of References to Individuals**

INDIVIDUAL	EXHIBIT CITATION	False Statement/Harassment
Sean King	Exhibit F, Page 20	PLEASE EXPOSE "OFFICER" SEAN KING, IDAHO'S FINEST GROPER Sean King, without probable cause or necessity, groped Marris Anderson . . . This was a case of sexual harassment and abuse.
Sean King	Exhibit F, Page 20	Please call Meridian Idaho Police Dept (208) 888-6678 to express your disgust... After becoming outraged by the above story in the newsroom, please express your disgust that we have to be exposed to officers like Sean King and be at his mercy on or near Meridian. (208) 888-6678
Chris McCurdy / Holland & Hart	Exhibit F, Page 28	CTA- Ways to assist our neighbor, Ammon Bundy . . . - <ul style="list-style-type: none"> • 3. The link above provides an update. Update 1 . . . We are asking everyone to file a grievance with the Idaho State Bar against the two attorneys that were present, Erik Stidham and Christopher McCurdy. This seems unethical at the very least. This grievance form (in the link below) needs to be filled out, one form for each attorney, and returned to the Idaho State Bar in PDF format. You can mail it to Idaho State Bar, PO Box 895, Boise, ID 83701 or email the PDF form to Katherine Williams at kwilliams@isb.idaho.gov.

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INDIVIDUAL	EXHIBIT CITATION	False Statement/Harassment
Chris McCurdy / Holland & Hart	Exhibit F, Page 32	<p>CALL TO ACTION - 5 Minutes STAND UP FOR AMMON Kangaroo Courts is Vicious and ruthless. Read Details below. . .</p> <ul style="list-style-type: none"> • We are asking everyone to file a grievance with the Idaho State Bar against the two attorneys that were present, Erik Stidham and Christopher Mccurdy. This seems unethical at the very least. This grievance form (in the link below) needs to be filled out, one form for each attorney, and returned to the Idaho State Bar in PDF format. You can mail it to Idaho State Bar, PO Box 895, Boise, ID 83701 or email the PDF form to Katherine Williams at kwilliams@isb.idaho.gov.
Chris McCurdy / Holland & Hart	Exhibit F, Page 39	<p>UPDATE: THEY TRIED TO PUT ME JAIL BUT I CAME HOME ONE MORE TIME</p> <ul style="list-style-type: none"> • St. Luke's had a lawyer from Holland & Hart who then began to manipulate the entire proceeding. It was amazing to witness. St Luke's hospital is the largest "private" employer in the state of Idaho and Holland & Hart is one of the largest law firms in the western United States. They are both tied closely to Governor Little and Scott Bedke. I would have never believed the power they hold over Idaho courts unless I had

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		<p>witnessed what I did yesterday in that courtroom.</p> <ul style="list-style-type: none"> St. Luke's executives went back on the agreement because either they communicated with the judge while she was out (which is illegal by the way) or they saw that the judges had extreme contempt towards me and wanted to grasp the opportunity to go for blood. Mr. Topmiller said to me, "The judge was going to do whatever St. Luke's wanted." Ultimately, St. Luke's and Holland & Hart wanted me in jail, / must go to jail. I do not believe St. Luke's and Holland & Hart accepted my token of peace because they continue to seek for blood.
Chris Roth	Exhibit F, Page 4	Chris Roth, President/CEO of St Lukes – WANTED... Chris Roth is WANTED! He is WANTED by the people to do what is right!
Chris Roth	Exhibit F, Page 22 – 27 Exhibit F, Page 41 - 46	<p>Come no more upon me, a warning letter from Ammon Bundy - To: ..., Chris Roth; ..., Erik Stidham;</p> <ul style="list-style-type: none"> Now in less than a week. I will be forced to defend myself again in trial, facing a team of government attorneys, for peacefully standing outside St Luke's Hospital demanding that they give

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		<p>baby Cyrus back to his loving parents. . By the time I get out. St. Luke's executives and Holland & Hart partners with help from a few Ada County Judges will do their best to strip my family from anything we have.</p> <ul style="list-style-type: none"> • So, rather than taking action co ensure that the situation with baby Cyrus does not happen again, instead, St Luke's CEO, Chris Roth, has authorized hundreds of thousands of dollars of donations given to St. Luke's Hospital to pay a law firm to financially destroy baby Cyrus' family and those who stood with them. • St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. • I am certain if I am thrown in jail, by the time I get out, St. Luke's Executives and Holland & Hart Partners with help from a few Ada County Judges, will do their best to take everything they can from me and strip my family from anything we have left. • I therefore warn; ..., Chris Roth, ..., Erik Stidham, ..., in the name of Jesus Christ, that you come no more upon me or my family. I pray that I

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		<p>will be even more patience than I have been and hope that you will repent of your violations against the people of Idaho and myself.</p>
Chris Roth	Exhibit F, Page 28	<p>CTA- 5. Additionally, you can write to Chris Roth, CEO of St. Luke's Hospital, however, the only email we could find to the foundation is: foundation@slhs.org</p>
Chris Roth	Exhibit F, Page 29 - 31	<p>UPDATE: I MADE A PEACE OFFERING, LETS SEE IF THEY WILL TAKE IT.</p> <ul style="list-style-type: none"> • St. Luke's CEO, Chris Roth has authorized undefined amounts of funds to the Holland & Hart law firm to overwhelm the court with legal filings, motions and injunctions, seeking to ruin what finances and reputation I have left, (Diego too).
Chris Roth	Exhibit F, Page 32	<p>CALL TO ACTION - 5 Minutes STAND UP FOR AMMON Kangaroo Courts is Vicious and ruthless. Read Details below. Click Read</p> <ul style="list-style-type: none"> • 5. Additionally, you can write to Chris Roth, CEO of St. Luke's Hospital, however, the only email we could find to the foundation is: foundation@slhs.org
Kelly Shiplock	Exhibit F, Page 8 Exhibit F, Page 18	<p>Be a Keyboard Warrior - ... send emails to Health and Wellness and demand that Baby Cyrus to home... Kelly.shiplock@dhw.idaho.gov</p>

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Erik Stidham / Holland & Hart	Exhibit F, Page 22 – 27 Exhibit F, Page 41 - 46	<p>Come no more upon me, a warning letter from Ammon Bundy - To: ..., Chris Roth; ..., Erik Stidham;</p> <ul style="list-style-type: none"> • Now in less than a week. I will be forced to defend myself again in trial, facing a team of government attorneys, for peacefully standing outside St Luke's Hospital demanding that they give baby Cyrus back to his loving parents. If convicted, I will be fined thousands of dollars and will most likely spend months, if not a year in jail, away from my little family who need me. By the time I get out. St. Luke's executives and Holland & Hart partners with help from a few Ada County Judges will do their best to strip my family from anything we have. • I was informed by two very creditable, independent sources (one a high-ranking Ada County Official and the other an attorney who works with St. Luke's hospital) that St. Luke's CEO gave Holland & Hart a blank check to financially destroy Diego and I for speaking out against them in the role they played in taking baby Cyrus. • Holland & Hart receiving open payments from St.

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		<p>Luke's Hospital to destroy lives by abusing the court is a prime example of Judicial Terrorism (II).</p> <ul style="list-style-type: none"> • I am certain if I am thrown in jail, by the time I get out, St. Luke's Executives and Holland & Hart Partners with help from a few Ada County Judges, will do their best to take everything they can from me and strip my family from anything we have left. <p>I therefore warn; ..., Chris Roth, ..., Erik Stidham, ..., in the name of Jesus Christ, that you come no more upon me or my family. I pray that I will be even more patience than I have been and hope that you wil repent of your violations against the people of Idaho and myself.</p>
Erik Stidham / Holland & Hart	Exhibit F, Page 28	<p>CTA- Two Holland and Hart attorneys (representing the hospital in the civil lawsuit against Ammon) were present and advising/whispering to the prosecutor from behind. We are asking everyone to file a grievance with the Idaho State Bar against the two attorneys that were present, Erik Stidham and Christopher Mccurdy. This seems unethical at the very least. This grievance form (in the link below) needs to be filled out, one form for each attorney, and returned to the Idaho State Bar in PDF format. You can mail it to Idaho State Bar, PO Box 895, Boise, ID 83701 or email the</p>

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		PDF form to Katherine Williams at kwilliams@isb.idaho.gov .
Erik Stidham / Holland & Hart	Exhibit F, Page 29 - 31	UPDATE: I MADE A PEACE OFFERING, LETS SEE IF THEY WILL TAKE IT. The action from Holland & Hart, led by Eric Stidham is an extreme abuse of the Idaho courts and I am surprised that Judge Lynn Norton has allowed it to go on for this long. The Holland & Hart law firm has a lot of pull and I am certain Judge Norton is intimidated by them and the power they wield in Idaho.
Erik Stidham / Holland & Hart	Exhibit F, Page 32	CALL TO ACTION - 5 Minutes STAND UP FOR AMMON Kangaroo Courts is Vicious and ruthless. Read Details below. Click Read . . . We are asking everyone to file a grievance with the Idaho State Bar against the two attorneys that were present, Erik Stidham and Christopher McCurdy. This seems unethical at the very least. This grievance form (in the link below) needs to be filled out, one form for each attorney, and returned to the Idaho State Bar in PDF format. You can mail it to Idaho State Bar, PO Box 895, Boise, ID 83701 or email the PDF form to Katherine Williams at kwilliams@isb.idaho.gov .