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**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

**ANSWER TO FOURTH AMENDED
COMPLAINT AND DEMAND FOR JURY
TRIAL**

Diego Rodriguez , for his Answer to the FOURTH AMENDED COMPLAINT AND DEMAND
FOR JURY TRIAL, states:

1. The complete tenor, purpose, and intent of this lawsuit/complaint is flawed, full of lies and deception, based on malice and ill intent, and is shocking to the consciences of decent human beings everywhere.
2. On March 11th, 2022, my Grandson, Cyrus Anderson, known and referred to as “Baby Cyrus” was wrongfully kidnapped by Meridian Police officers who broke no less than 8

laws in the process of kidnapping Baby Cyrus. This information has already been widely disseminated and demonstrated to the public and pending litigation will demonstrate it even further.

3. After Baby Cyrus was illegally kidnapped, he was taken to St. Luke's Hospital and kept in their custody UNLAWFULLY for days, while they profited off of his presence in their hospital.
4. Myself and many others were shocked and appalled to learn that St. Luke's Hospital and the State of Idaho receive compensation for such illegal kidnappings and have been doing so since 1997 when the ASFA law was passed.
5. We went on to protest legally and peacefully in front of St. Luke's hospital and I also personally published in every medium possible the facts we learned about the entire ordeal which included but is not limited to the fact that: St. Luke's Hospital profits off of medical kidnapping; doctors and staff at St. Luke's hospital including the plaintiffs named in this case act knowingly as kidnappers by using CPS as a weapon to steal babies and profit off of them, they do so knowingly and intentionally particularly when parents do not submit to their authority in medical decisions for their children (a tactic they call going "AMA – against medical advice), and they are specifically hostile towards families who choose not to use vaccines for their children; that St. Luke's hospital earned millions of dollars from COVID monies; that St. Luke's hospital has killed babies in the past through incompetence; that relationships, history, and anecdotes all demonstrate that the Idaho Department of Health and Welfare along with many other bad actors in what could only be referred to as the "Idaho Swamp" including police (particularly the Meridian Police Department), judges (particularly Judge Laurie Fortier), the C.A.R.E.S. staff and

many others are all participants in this system of profiting from child kidnapping that could only be described as “government subsidized child trafficking.”

6. Everything I stated and published is either completely true or is something I believe to be completely true. In America, we have the right to Freedom of Speech and no one can compel me to not speak the truth about any subject—particularly when the welfare and safety of my own grandson is involved.
7. This lawsuit is nothing more than what has been colloquially referred to as a “SLAPP suit”—a baseless lawsuit designed to silence political opposition. As described and defined by Middle Tennessee State University, *“A SLAPP suit, or strategic lawsuit against public participation, is a civil claim filed against an individual or an organization, arising out of that party’s speech or communication to government about an issue of public concern. At the heart of the SLAPP suit is the petition clause of the First Amendment. ‘SLAPP’ was coined to recognize lawsuits filed to silence criticism A SLAPP suit may look like a civil lawsuit for defamation, nuisance, interference with contract, interference with economic advantage, or invasion of privacy, but its purpose is different. About this purpose, Judge J. Nicholas Colabella wrote in Gordon v. Marrone (N.Y. 1992), “Short of a gun to the head, a greater threat to First Amendment expression can scarcely be imagined.”* Professors George W. Pring and Penelope Canan coined the term SLAPP suit in the 1980s after noting a surge in lawsuits filed to silence public criticism by citizens. SLAPP suits arise when citizens erect signs on their own property, speak at public meetings, report violations of environmental laws, testify before Congress or state legislatures, or protest publicly, among many other similar acts, thereby prompting a party who claims to be aggrieved by such acts — often developers,

merchants, and even public officials — to file suit. SLAPP suits can interfere with First Amendment rights. The petition clause of the First Amendment guarantees, in part, “the right of the people. . .to petition the government for a redress of grievances.” The abridgment of this right distinguishes a SLAPP suit from other cases based on similar allegations.

8. This lawsuit is a perfect textbook case of a SLAPP suit, and it is shocking to the conscience of all with human decency that the court system would be used to silence the voice of a grandfather who is criticizing a system that illegally kidnapped his grandson!
9. Additionally, this case if it is allowed to stand is an affront to 1st Amendment rights. I have the right to speak whatever I choose to speak—particularly when what I am speaking is completely true or I believe it to be true.

10. I plead a defense of petition clause immunity and ask the court to dismiss this case at once.

11. Additionally, in response to the baseless FOURTH AMENDED COMPLAINT from the Plaintiffs, I issue the following:

12. PARAGRAPH 1 – How sick and twisted could someone possibly be to even imagine that I was engaging in a “grift” as they call it—that I was trying to gain money and publicity from the kidnapping of my grandson. This level of depravity is rare, and one can only assume that the plaintiffs or their counsel are acting in perfect alignment with the textbook psychological definition of “projection,” which means that they accuse you of doing what they would do. Normal, decent and honest citizens with integrity would never think to use the most horrifying experience in their entire life—the kidnapping of a precious baby, in this case my own grandson—for profit! How sick, twisted, and

disgusting do you have to be to even consider such a thing? The only intent I had was to get my grandson back! It's pretty simple. You kidnap my grandson and I am going to do everything possible to get him back. And yes, that will include publishing TRUE FACTS about the people who were responsible for his kidnapping, or who had Baby Cyrus in their possession.

13. PARAGRAPH 2 – There was no “smear campaign.” There was the publication and pronouncement of facts. Everything that was published has been demonstrated to be true, and even the plaintiffs have been unable to demonstrate that a single publication or pronouncement that I have ever made was false—even though I have given them the chance to do so. If there is any smear campaign, it is on behalf of the plaintiffs and their counsel. Again, they are using classic “projection”—accusing me of doing what they are doing. Additionally, I never once incited anyone to violence nor would I do so. I am a Christian minister, and I don't believe in violence except in the case of self-defense. I never encouraged any acts of violence against anyone and the fact that the plaintiffs have been unable to demonstrate a single instance where I did shows again how baseless and immoral this lawsuit is in the first place.

14. PARAGRAPH 3 – I never mischaracterized the Idaho Department of Health and Welfare's “decision to intervene.” On the contrary, everything I have published and everything which remains available online for the world to see demonstrates that Baby Cyrus's kidnapping was not only illegal but demonstrably horrific and terrifying to the public conscience. They used the false premise of “imminent danger” to justify taking Baby Cyrus by force when the proof has already been published that all 3 parties involved in his kidnapping: the IDHW, St. Luke's Hospital, and the Meridian Police

Department all knew Baby Cyrus was not in “imminent danger.” Video evidence along with medical records which declare this to be so have already been published and reviewed thousands of times by the public—the evidence is plain.

15. PARAGRAPH 4 – Of course I claimed and stated that St. Luke’s Parties were participants since they were! They received and kept Baby Cyrus in their custody. They financially profited from Baby Cyrus. We don’t know how much yet, but through printed communication we have already received, we know that St. Luke’s hospital received no less than \$34,000 for having Baby Cyrus illegally in their custody after he was forcefully, violently, and illegally removed from his parents. The kidnapping, of course, was all filmed, and it has been viewed more than 12 million times by a horrified public all over the world.

16. PARAGRAPH 5 – Ammon Bundy and I didn’t “coordinate attacks” against anyone or anything. But even if we did “coordinate” our message, so what? Ammon Bundy is my friend and he is a close friend of our family, and he likewise loves Baby Cyrus. I would do for him the same as he did for our family if the situation were reversed. And furthermore, it is not illegal to “coordinate” messages and publications. So each of these baseless assertions amounts to nothing more than whining and complaining about the fact that you are being exposed. Furthermore, their baseless and unscrupulous attempt to rope in any of several organizations that Ammon or I are associated with is truly vile. We had one goal—to get Baby Cyrus back and nothing else. Neither Ammon nor I received a single solitary cent of profit in the course of fighting for Baby Cyrus. On the contrary, we both suffered greatly as a result of this process. My entire family suffered financially. When your child is kidnapped, do you think you can go to work the next day and act like

nothing has happened? Families financial situations are ruined as a result of these types of kidnapping cases. My son-in-law could not work. I could not work. Nobody in my family could work. We were emotionally devastated and dedicated every waking hour of every day to do whatever was necessary to get Baby Cyrus back. The websites mentioned by the plaintiffs do not earn money, on the contrary, they cost me money. I have never made a red cent off of that website. And no other entity mentioned used this situation for financial gain. There was a GiveSendGo campaign started for Baby Cyrus's parents to help raise money for legal expenses and their own personal financial support during this time, but that is an obvious response to a kidnapping incident and the monies raised went to Baby Cyrus's parents and not to any defendant named in this case. Shame on the Plaintiffs and their counsel for making such an evil and baseless accusation. In doing so, they are only showing the wickedness of their own hearts and demonstrating to the world that that is what they would do in such a situation because their hearts are evil.

17. PARAGRAPH 6 – the St. Luke's parties evidently and obviously do not bring this lawsuit to protect anything else other than their own exposure. This is an immoral and unconscionable SLAPP suit that should be dismissed.

18. PARAGRAPH 16 – how dare you claim that our church is not a real church but only “purports to be a church.” Freedom Tabernacle has operated as a Christian church since 2011, a full 9 years before I ever even met Ammon Bundy. We have Christian services, bible studies, baptisms, marriages, and engage in a whole host of other Christian ministries. We follow the Biblical example of a house church (1 Corinthians 16:19, Philemon 1:2, Romans 16:5) and therefore don't waste God's resources on commercial rent and the like. Just because you don't like the members of the church doesn't give you

the right to claim that the church is not real. You should be ashamed of yourselves.

Furthermore, you contradicted yourself by stating that Freedom Tabernacle only

“purports to be a church” but then go on to claim that I am “financially motivated to grow Freedom Tabernacle,” which infers that you recognize it as an *actual* church.

Additionally, you claim that I used an “enhanced profile and manufactured conspiracy relating to the Infant to sell three-day “training” courses through Power Marketing for which he charges \$15,000 per student.” This only demonstrates your incompetence, foolishness, and ignorance. I have never used anything relating to Baby Cyrus to sell anything, EVER! What you are evidently referring to is a broadcast on Rick Green’s podcast where we discussed the Baby Cyrus case before going on to promote a 3-day Entrepreneurial Boot Camp for young people to learn how to become entrepreneurs.

What you failed to pay attention to was the fact that this 3-day course, was given to the 20 students who would attend it for FREE! Again, you have shown that you are so completely possessed with wickedness and evil, that your confirmation bias does not allow you to see any truth, facts, or reality, even when it is clearly described for you. Go back and watch the video again. This is just more evidence that the plaintiffs and/or their counsel are unethical in their malicious intent to try and deny me my 1st amendment right to free speech and to financially destroy me using this very court as a weapon, that they are unable to tell the truth, or at least state facts accurately, in their official court filings.

19. PARAGRAPH 17 – again, the plaintiffs or their counsel are simply unable to get facts right and likewise are attempting to just throw enough mud at the wall in the vain hope that some of it will stick. The corporate entities mentioned have nothing to do with the Baby Cyrus case, but are all separate entities. And even if they weren’t, that would have

no relevance to the case, particularly and specifically since no defendant named in this case has ever gained a single penny off of Baby Cyrus's kidnapping. On the contrary, we all suffered greatly, both emotionally and financially.

20. PARAGRAPH 18 – FreedomMan.org is my personal blog. There is no “Freedom Man Press, LLC” and the plaintiffs know that. And we do not advocate for the harassment of political opponents through “doxing” as this paragraph claims. But even if I did, that would not be illegal. So again, plaintiffs or their counsel are showing their deep seated desire to bring as much nonsense to the case as possible to frustrate the process and to bury me and the defense in meaningless discussions and debates about irrelevant subjects. This just amounts to more whining and complaining as if the plaintiff is a child on the recess playground using the court system to gripe about others who did or said things they don't like. The court should not allow itself to be abused in this fashion.
21. PARAGRAPH 21 – I do not believe the court has personal jurisdiction over me based on Idaho Code § 5-514 since I have not done any of the acts enumerated in this statute.
22. PARAGRAPH 22 – The venue is not proper according to the Idaho Code §§ 5-401 and 5-404 as no real property is under consideration, and I was not a legal resident of Idaho at the time of Baby Cyrus's kidnapping.
23. PARAGRAPH 24 – Idaho's statute is much more specific than just “concerns about a child's safety.” The statute specifically states, that a mandatory reporter must report if a child under 18 “has been abused, abandoned or neglected or who observes the child being subjected to conditions or circumstances that would reasonably result in abuse, abandonment or neglect...” If there is no reason to believe that parents are abusing or causing a child to be abused, abandoned, or neglected, then there is no requirement to

make a referral to IDHW. A parent refusing medical advice does not qualify as “abuse.” So the entire foundation of any CPS referral for Baby Cyrus is false unless anyone can provide evidence that Marissa and Levi (Baby Cyrus’s parents), were abusing Baby Cyrus or were subjecting him to conditions or circumstances that would reasonably result in abuse. Nobody has provided a shred of evidence to this end. Therefore, the entire case was baseless from the start.

24. PARAGRAPH 25 – As already mentioned and already proved repeatedly in public in multiple venues and which can clearly be seen with the evidence provided on this page (<https://www.freedomman.org/cyrus/archive/zero-evidence-for-imminent-danger/> and <https://www.freedomman.org/cyrus/archive/they-lied-to-you-baby-cyrus-was-healthy-baby-when-kidnapped/>), Baby Cyrus was never in “imminent danger” and the police who took him knew he was not in imminent danger. The Idaho Department of Health and Welfare knew he was not in imminent danger, and St. Luke’s Hospital knew he was not in imminent danger. The IDHW and the Meridian Police department both knew because they had already prepared to take Baby Cyrus to a foster family within minutes of him being kidnapped but only decided not to do so because protestors had gathered in front of the hospital. This was published in the medical report and the entire world has seen it. If Baby Cyrus was about to die being in “imminent danger” then why would they take him to a foster family, to complete strangers who are not doctors, to be put in their custody? Obviously, he was not in “imminent danger” and they knew it. St. Luke’s hospital likewise knew because the doctor who reviewed Baby Cyrus when he was brought in clearly stated in her report that Baby Cyrus was a perfectly “healthy baby” and that there were “no acute life threats” noted. Very specifically, the St. Luke’s doctor stated that Baby

Cyrus's life was not in danger at all. To keep Baby Cyrus after making this official diagnosis is both evil and diabolical.

25. PARAGRAPH 27 – Baby Cyrus was determined by St. Luke's hospital itself to not be in imminent danger. So the entire case is a farce.

26. PARAGRAPH 30 – It is a complete lie to state that Baby Cyrus would not breastfeed. On the contrary, nursing was at the time his only source of nutrition. To take him away forcefully from his only source of nutrition was, in and of itself, the greatest form of child endangerment imaginable.

27. PARAGRAPH 32 – In this paragraph the plaintiffs are tacitly admitting that Dr. Natasha Erickson used CPS as a threat in order to force Levi and Marissa to obey her. CPS is supposed to be used to protect children not used as a weapon to control parents.

28. PARAGRAPH 33 – Numerous doctors have already stated and will provide affidavits if necessary to describe how the nasal feeding tube given to Baby Cyrus was totally unnecessary. Not only was it unnecessary, but after returning home from St. Luke's custody, Baby Cyrus had a C-DIFF infection which is a terrible infection that is known to come from hospitals and specifically from nasal feeding tubes. Nurse Tracy Jungmann even jammed the tube back into Baby Cyrus's nose after it had fallen out, and had been dangling about for hours, without sanitizing it, sterilizing it, or replacing it. Baby Cyrus did not have a C-DIFF infection before being kidnapped and this infection has taken a serious toll on Baby Cyrus. The only known place where Baby Cyrus could have contracted this infection is at St. Luke's hospital.

29. PARAGRAPH 35 – This is an outright lie and it is shocking that you would include such a lie. It either demonstrates your complete lack of respect and disregard for the court

system, or your utter incompetence since you are claiming that “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.” However, we have the medical records that clearly state that Dr. Natasha Erickson is the one who made the CPS referral. Why do you lie so blatantly when your own records state the opposite?

30. PARAGRAPH 36 – This is another outright lie. Nobody tried to arrange a visit to the Infant’s home on March 5th or 6th. And there are no records demonstrating otherwise. Specifically, there were no voicemails or text messages left for Levi or Marissa to return.
31. PARAGRAPH 40 – How could the Idaho Department of Health and Welfare make the diagnosis of Baby Cyrus being in a “life threatening and/or emergency situation” when no single solitary person at the Idaho Department of Health and Welfare had seen Baby Cyrus personally? How can you make a diagnosis without seeing someone?
32. PARAGRAPHS 44 & 45 – The lies are endless! The police came to a house where I had an office for my business. I did not live in that house, nor did Levi and Marissa. Nobody lived in that house—it was used as an office. The day police came, I answered the door and there were 3 other young men helping me pack since we were tearing the entire office down and were preparing to move it all out of state. So there are 3 witnesses to attest to the fact that nobody “refused to cooperate, provide information, or let the officers see the infant.”
33. PARAGRAPH 47 – More lies and/or incompetence demonstrating the inability of the plaintiffs or their counsel to report any factual data accurately. Here it states that “When the police left the house to get a warrant, the Infant and the Infant’s parents moved to another location.” You people are so ignorant and incompetent and so willing to LIE that

you never even check your data to ensure your facts are right. The house they came to was 1876 E Adelaide in Meridian, Idaho, and Levi and Marissa have never lived at that address. Furthermore, they were not present at the time that the police came, so this claim is completely false. If the plaintiffs and/or their counsel can't be trusted to get basic facts right, then how can this baseless case be considered anything more than a frivolous lawsuit with fake allegations that can't be trusted?

34. PARAGRAPH 49 – Levi and Marissa never “refused to cooperate.” On the contrary, Marissa kindly and gently cooperated with police officers who promised her she would never be separated from Baby Cyrus and that she could ride with him to the hospital. Millions of people have seen the belligerent thug, Sargent Christopher McGilvery lie multiple times to Marissa’s face and tell her she would not be separated from Baby Cyrus. The truth is that Meridian Police refused to cooperate with Levi and Marissa who are the legal parents of Baby Cyrus and who have never done a thing to put him in harm. By kidnapping Baby Cyrus, the police were endangering Baby Cyrus since he has cyclical vomiting syndrome and his only source of nutrition at the time was his mother’s breast milk. The police knew this as Marissa told them, yet they took him anyway. This is pre-meditated child endangerment! Additionally, the police abused Levi, Marissa, and Baby Cyrus’s aunt by physically harming them, slamming Levi’s face against the truck, handcuffing him without cause, ripping Miranda (Baby Cyrus’s aunt) through the window and falsely arresting her without cause, and then arresting Marissa without cause and putting her in handcuffs after suffering the trauma of having her only child ripped from her arms by thugs with guns, and then being subject to physical humiliation when a police officer, Sean King (who had previously resigned his position at the Caldwell

police department during an investigation for sexual misconduct), groped Marissa and put his hands up her blouse and down her pants and around her waist. All of this can be seen from the bodycam footage which has been posted for all the world to see. And millions of people have seen it and have been rightfully appalled at the misconduct of these tyrannical police officers.

35. PARAGRAPH 51 – I don't care if St. Luke's had any authority or role in the taking of Baby Cyrus. The point is that St. Luke's received Baby Cyrus after he was kidnapped and kept him in their custody, earning over \$34,000 from him, even after their own doctor diagnosed him as being a "healthy baby" and not having any "acute life threats"—meaning that Baby Cyrus was never in imminent danger.
36. PARAGRAPH 53 – This is simply not true. Baby Cyrus has Cyclical Vomiting Syndrome which is a genetic disorder that causes him to go into long fits of vomiting. St Luke's doctors were totally unable to diagnose this problem and totally incompetent in their handling of the situation. And Baby Cyrus's health did not "dramatically worsen" under the parent's care. The truth is he dramatically worsened under St. Luke's care and even contracted a C-DIFF infection.
37. PARAGRAPH 54 – Baby Cyrus's health did not improve. He simply gained water weight from the nasal tube and the I.V. But that does not equate to "health."
38. PARAGRAPH 55 – How remarkable that the plaintiffs include this statement when it was Dr. Natasha Erickson from the get-go who could care less to listen to any of Baby Cyrus's medical history from the parents when they first came to St. Luke's. Marissa attempted desperately to explain Baby Cyrus's history, her experiences with Baby Cyrus, and specific accounts and anecdotes regarding his vomiting episodes, but Dr. Natasha

Erickson wouldn't listen, didn't care, and would not even let her finish as she simply determined to do what she was going to do and order up all the tests she wanted and to follow her allopathic protocols, whether they worked or not.

39. PARAGRAPH 57 – I never once stated that St. Luke's vaccinated Baby Cyrus. So here they go lying again. How many lies are they going to tell before the court realizes that this is a baseless and frivolous case, based on lies and rightfully throws the case out? However, they certainly did "harm Baby Cyrus in irreparable ways." In fact, Baby Cyrus has suffered since he was returned with what can only be described as PTSD. How sick and disgusting is a hospital that won't even allow a child's parents to stay with him? If they truly cared for Baby Cyrus, they would have allowed Levi and Marissa to stay with him permanently. And if they cared about righteousness and morality, they never would have kept Baby Cyrus in the first place.
40. PARAGRAPH 58 – the assessment that Baby Cyrus's condition improved significantly is doubtful at best, completely erroneous at worst. In any event, it is still subjective as we have other medical experts who would beg to differ. Having St. Luke's make conclusions about their quality of care is like asking the government to review itself to see if they acted tyrannically or not. The conclusion will always be the same, "we audited ourselves and we determined that we have done nothing wrong." Sorry, but that is simply not acceptable or believable. Baby Cyrus's C-DIFF infection alone is sufficient evidence that he did not improve while being held illegally as a medical prisoner at St. Luke's hospital.

41. PARAGRAPH 61 – Baby Cyrus did not have a severe, life threatening malnutrition or dehydration, and even if he did, it was not and would not have been caused by his parents and therefore it was illegal to forcefully remove him from his parent’s custody.
42. PARAGRAPH 62 – what “other defendants” are you referring to? You previously stated that People’s Rights (which is not a legal entity and does not exist legally) is indistinguishable from Ammon Bundy and that Freedom Man Press (which likewise does not exist legally) and Freedom Man PAC are indistinguishable from Diego Rodriguez. So which one is it—are Ammon Bundy and Diego Rodriguez the only defendants since they are indistinguishable from the entities named as co-defendants? Or are there “other defendants” as you have stated in this paragraph?
43. PARAGRAPH 63 – Here you go again making demonstrably and empirically false claims with no evidence whatsoever. And not only do they make no sense, but they are shockingly ridiculous. Ammon Bundy does not make any money off of his “personal brand” nor do I. My own work and business are not connected in any way to any political activism and all efforts that I have made in regards to Freedom Man PAC, Freedom Man Press (my own personal blog), or the Baby Cyrus case have cost me money and not earned me a dime. A simple browsing of Freedom Man PACs donation records with the Secretary of State will show that monies donated to the PAC for political marketing campaigns were donated by myself. So I have paid out of pocket for all political activity, and I likewise self-funded any and all costs associated with the Baby Cyrus kidnapping.
44. PARAGRAPH 64 – You just can’t stop telling lies and making yourself a psychology textbook example of “projection” where you accuse others of doing what you would do.

First of all, the only thing we intended to do was EXPOSE the wickedness of all bad actors in Baby Cyrus's kidnapping story so that we could get Baby Cyrus returned home safely before he was killed by St. Luke's hospital (which was a real and genuine threat since they have a history of killing children through incompetence—a history which has been documented from real stories already published through news websites and even a personal story from a personal friend whose 10 month old son was killed by St. Luke's hospital's incompetence). In the process of doing so, we discovered the government subsidized child trafficking scheme which has been going on since 1997, and I felt duty bound by God to expose this and publish it as far and wide as possible. And I will continue to do so, since it is 100% accurate and true. It is a fact that the federal government financial incentivizes local states to kidnap children without just cause, and it is a fact that nearly all the agencies involved and untold numbers of bureaucracies financially profit off of this child trafficking including the Idaho Department of Health and Welfare and St. Luke's hospital. These are simple facts that cannot be disputed.

45. PARAGRAPH 65 – As previously stated the explanation, exposition, and publication of “state-sponsored child kidnapping and trafficking” that included the plaintiffs is 100% accurate. There is no debate about whether or not what I have published is true. The only issue is whether or not the plaintiffs like the fact that I am publishing it. They obviously do not, and that is why they have initiated this SLAPP suit.

46. PARAGRAPH 66 – Defamation occurs when someone makes a **false statement** of fact to a third party and causes another harm as a result. In order for me to have defamed any of the plaintiffs, I would have had to make a knowingly false statement with malice for the purpose of intentionally harming the plaintiffs. True statements, or statements of

opinion (things that I believe to be true), are not defamatory and cannot be litigated against. This entire case is therefore frivolous because everything I have stated is either 100% true and accurate or it is an opinion that I believe to be true. Furthermore Idaho State Statute 18-4801. States clearly, *“LIBEL DEFINED. A libel is a malicious defamation, expressed either by writing, printing, or by signs or pictures, or the like, tending to blacken the memory of one who is dead, or to impeach the honesty, integrity, virtue or reputation, or publish the natural or alleged defects, of one who is alive, and thereby to expose him to public hatred, contempt or ridicule.”* In my case, there was no “malicious defamation” at any point of time. I simply published things that are factually true and/or things that I believe to be factually true (my opinions). Additionally, St. Luke’s hospital and its employees are pseudo public figures seeing as though a very large portion of their revenue comes from government payments. Also, Idaho State Statute 18-4804 clearly states that malice is only presumed if *“An injurious publication is presumed to have been malicious if no justifiable motive for making it is shown.”* Well, it is very obvious that there are at least two very justifiable motives for exposing state subsidized child trafficking in Idaho (and nationwide). First, it was to see to it that Baby Cyrus was returned to his parent’s custody before further harm or death come to him. And second it was to expose the wickedness of the state subsidized child trafficking “ring” which I now believe to be a personal call from God—a duty far superseding any force or compulsion the government would try to tyrannize me with.

47. PARAGRAPH 67 – I never told anyone to “dox” anyone at any time. Furthermore, even if I did, “doxing” is not illegal nor is it slanderous or defamatory. In fact, it is a

Constitutionally protected right to have free speech and to assemble (in the case of protests).

48. PARAGRAPH 68 – As has already been described and explained, there was no defamation nor any evidence thereof. On the contrary, everything I have published is 100% accurate and true, or it is my opinion that I believe to be 100% accurate and true. I have personally given the plaintiffs and their counsel the opportunity to prove that any statement I have ever made or published was false, and they have failed to produce a single shred of evidence demonstrating any false statements on my behalf. This lawsuit is therefore frivolous and unconscionable and should be dismissed at once, lest the plaintiffs and their counsel learn to believe that they can manipulate the court system and use it as a weapon for their own pleasure regardless of how many Constitutional rights, civil rights, and other rights they destroy in the process.

49. PARAGRAPH 69 – There were no “false claims,” and since the plaintiffs have failed to produce a single shred of evidence that a false claim was made, particularly and specifically when the vast majority of all claims I have made are easily substantiated with publicly available data, then all complaints to the contrary are null and void. Plaintiffs must stop making false assertions immediately.

50. PARAGRAPH 70 – I am not responsible for the fallout which comes after truthful information is published about someone or some entity. I understand that if I willfully spread a false statement with the intention of harming another, that I am responsible for the consequences as that is true defamation. However, if I publish true information about evil activities on the behalf of another party, the consequences of that publication rests on the shoulders of those who committed the evil deeds. If St. Luke’s loses business or

prestige because the public learns that they profit off of the illegal, immoral, and unconscionable government subsidized child trafficking system that kidnaps approximately 4 children per day in Idaho—then those consequences belong on St. Luke’s itself. If they don’t want to face those consequences, instead of suing private individuals for exposing them, **they should consider the option of simply not participating in government subsidized child trafficking any longer!**

51. PARAGRAPH 71 – This is an absolutely ridiculous statement. What I knew and believed to be true at the time, and which has only been confirmed and validated much more profoundly since that time is that there is no justice for families who have been victimized by the government subsidized child trafficking system. Not only are parents forced to jump through endless hoops, logistical obstacles, outrageous legal expenses, total disruption and destruction of their livelihood, and more—but many children are completely lost (yes, they actually disappear forever) by IDHW and Foster Care in general, and many others end up seriously abused or dead. Baby Cyrus’s condition as a baby who at the time of his kidnapping could only feed off of his mother’s breastmilk was particularly dangerous since he could easily have died from lack of nutrition or care in St. Luke’s custody and the hospital would have just blamed it on the parents—a technique that they have used for years in many other cases and which they used quite profitably during the COVID scam. Therefore, time was of the essence as Baby Cyrus’s life was literally at risk. So no, there was no legal process or option to “address the custody and welfare of the infant,” especially and particularly since the entire kidnapping was predicated on a false premise of “imminent danger” which has already been proven to be false.

52. PARAGRAPH 72 – This is a useless attempt to create a straw-man argument that would only work against an ignorant judge or jury and such arguments are only used by legal teams who have no respect for the intelligence of said judge(s) or juri(es). What we actually knew and know is that St. Luke’s was receiving compensation for maintaining Baby Cyrus in their unlawful custody. We knew and know that the Idaho Department of Health and Welfare is financially incentivized to kidnap as many children as possible being paid millions of dollars annually by the Federal Government to do so. We knew and know that Baby Cyrus was illegally kidnapped by Meridian Police who broke at least 8 laws when they kidnapped him and based the entire kidnapping off of the false lie of “imminent danger” which has already proven to be false (the 8 Idaho laws that were broken can be seen here: <https://www.freedomman.org/cyrus/laws-that-were-broken/>). We knew and know that Baby Cyrus was in physical danger and his life was threatened by being away from his mother’s love, care, nurture, and most importantly—her breastmilk, which was the only source of nutrition that Baby Cyrus had received up to the time he was kidnapped, and the only source of nutrition that he demonstrated he could maintain. What we knew and know is that St. Luke’s hospital has already killed other babies through incompetence as demonstrated by this article published by the Idaho Statesman <https://www.idahostatesman.com/news/local/article41570394.html> and also by the personal testimony of Ed Danti, a family friend, who had his 10 month old child killed through medical incompetence from the St. Luke’s staff (his testimony can be seen here <https://stlukesexposed.com/truth-about-st-lukes/how-st-lukes-killed-a-10-month-old-baby/>). What we knew and know is that this government subsidized child trafficking system is so deep rooted, pervasive, and profitable, and that the bad actors involved have

so much to lose by being exposed, that most previous attempts by whistleblowers, investigative journalists, and others end up in their own “mysterious deaths.” This includes well known and prominent Georgia Senator who was murdered in her own home after publishing the scathing report, “The Corrupt Business of Child Protective Services” and who simply published and declared many of the same things that I have published and declared. So yes, the issue is serious and yes, I knew and know that everything I said and published was true and that St. Luke’s would not want me to publish it. This very lawsuit, as frivolous and unconscionable as it is, simply serves to ratify, verify, and confirm what the public was already thinking and believing—that St. Luke’s hospital is in fact guilty of the very things we have said they are guilty of (namely being willful participants in a government subsidized child trafficking system), and that they should not be trusted.

53. PARAGRAPH 73 – We never once engaged in any “wrongful acts.” On the contrary, St. Luke’s and the other plaintiffs engaged in many unlawful acts. Primarily, “kidnapping,” which is defined by Idaho State Statute § 18-4501 as “*KIDNAPING DEFINED. Every person who willfully... Leads, takes, entices away or detains a child under the age of sixteen (16) years, with intent to keep or conceal it from its custodial parent, guardian or other person having lawful care or control thereof, or with intent to steal any article upon the person of the child...*” By this legal definition, St. Luke’s and all other parties involved in Baby Cyrus’s kidnapping committed the illegal acts of legally defined “kidnapping” since they “*detained a child under the age of 16 years with the intent to keep...it from its custodial parent...[or] to obtain money, property or reward or any other thing of value for the return or disposition of such person is guilty of kidnaping*

[sic].” Since Baby Cyrus was illegally taken from his parent’s custody, and St. Luke’s Hospital was fully aware that his forceful kidnapping was illegal since it was their own doctor who pronounced that Baby Cyrus was not in “imminent danger” and that he was a “healthy baby” who had “no acute life threats,” and since St. Luke’s did not allow Baby Cyrus’s parents to be with him continuously, but rather kept him in their own custody racking up a bill and earning compensation from the government for at least \$34,000 (and likely much more), then this is the exact definition of kidnapping according to Idaho law, and St. Luke’s is guilty of it. They are the ones who committed “wrongful acts.”

54. PARAGRAPH 74 – This false claim has already been refuted above, but for sake of clarity, the only goal I had in publishing the truth about the plaintiffs was to 1) see to Baby Cyrus’s safe return as quickly as possible and 2) to ensure that the public was aware of the evil of government subsidized child trafficking that we uncovered (but were previously unaware of).

55. PARAGRAPH 75 – Again, everything I stated in this regard was factually accurate. Baby Cyrus was reviewed by the doctor onsite at St. Luke’s hospital when he was kidnapped and the doctor said that Baby Cyrus was a “healthy baby” and that “no acute life threats” were noted. Likewise, the parents only missed that one single medical appointment (which is not a justifiable reason for medical kidnap anyway), and we have the medical report which plainly declares that Dr. Natasha Erickson is the one who made a referral to CPS. So this paragraph is just “lie after lie after lie” demonstrating again the frivolous nature of this lawsuit.

56. PARAGRAPH 76 – This is the third time in this complaint that the plaintiffs have alleged that Dr. Natasha Erickson never contacted DHW regarding the infant. However, the

medical records show this to be false as anyone can see in the screenshot below:

Anderson, Cyrus James
MRN: 4289116, DOB: 5/1/2021, Sex: M
Acct #: 455708612
Adm: 3/12/2022, Adm: 3/12/2022, D/C: 3/15/2022

03/12/2022 - ED to Hosp-Admission (Discharged) in Boise Pediatrics (continued)

All Encounter Notes (group 1 of 3) (continued)

Progress Notes by Brianne E. Breese, LMSW at 3/12/2022 1730

Social Work Brief Note:

Situation: Cyrus Anderson is a 10 m.o. male who was admitted for failure to thrive. Social work consult from Natasha D. Erickson, MD for failure to thrive, ward of the state.

	03/12/22 1751
Referral Data	
Referral Source	Provider
Referral Name	Natasha D. Erickson, MD
Reason for Consult	Other (Comment) (failure to thrive, ward of the state)

Additionally, Dr. Erickson threatened to call CPS for Levi and Marissa wanting to leave the hospital without her consent (a threat called “AMA – against medical advice”) which has already been admitted by the plaintiffs in paragraph 32 of the complaint. And the day after Dr. Natasha Erickson made this threat, Marissa was visited in the hospital by a social worker from CPS.

57. PARAGRAPH 90 – I was not a paid marketing consultant for the Bundy Campaign. On the contrary, I did not earn a single dime of profit for any support I gave the Bundy for Governor campaign. It is against my personal belief system to profit off of political campaigns. You can feel free to ask any other elected official in Idaho’s current government including but not limited to Congressman Russ Fulcher, Attorney General Raul Labrador, State Representative Jason Monks, former Secretary of State Lawrence Denney—all of whom I supported and helped their campaigns—how much money I charged them for my “marketing support” or help. I cannot and will not profit off of

political activism as it is against my personal convictions to do so. I believe in having a righteous government system and such a system can only be maintained if financial incentives are not held by the individuals involved in the process. Therefore, I support the individual candidates I believe in, and I refuse to earn any profit from the process.

58. PARAGRAPH 93 –

- a. *“St Luke’s parties were participating in a conspiracy to kidnap, traffic, sexually abuse, and kill children.”* This statement is mostly true, though it conflates, confuses, and mixes many different elements of the truth and what has been published. It is true that St. Luke’s hospital does participate in government subsidized child trafficking, and they likewise profit off of it. However, I have never stated that St. Luke’s sexually abuses any children, though I have stated (because it is true), that many children who are taken by the government subsidized child trafficking system and placed into foster care do end up being sexually abused, and the Foster Care system nationwide admits this to be true. Additionally, I have claimed that children are killed while in St. Luke’s care, a fact that has already been substantiated in this response above.
- b. *“St. Luke’s parties were running a child trafficking ring in order to profit from tax dollars.”* No, St. Luke’s is not **running** a child trafficking ring, rather, they are **participating** in the government subsidized child trafficking ring that is run in Idaho by the Idaho Department of Health and Welfare.
- c. *“St. Luke’s parties were abusing and harming the Infant in irreparable ways.”* They did harm Baby Cyrus in irreparable ways. That is my subjective opinion, and I stand by it to this day. Additionally, the family and I are in agreement in

our belief that Baby Cyrus's C-DIFF infection was contracted at St. Luke's hospital as he did not have the infection previous to his kidnapping, and there is no other likely place for him to have contracted this infection.

- d. *"St. Luke's parties harmed and killed babies all the time."* St. Luke's has harmed and killed babies. I have already given two specific examples above and this does not include the number of children who were killed on ventilators during the COVID scams, through vaccine injuries that were forced on children through intimidation and fear, or any other illegitimate means to which the hospital knows it should not be doing. John Hopkins University published a study declaring death from doctors in allopathic hospitals (including St. Luke's) to be the 3rd leading cause of death in America, and being statistically responsible for 250,000 to 400,000 deaths every year (<https://www.cnbc.com/2018/02/22/medical-errors-third-leading-cause-of-death-in-america.html>). Only God knows how many of those deaths are minors at St. Luke's hospital but the evidence is clear that St. Luke's hospital does kill children, whether on accident or on purpose is not relevant to this case since Baby Cyrus was held in St. Luke's possession against the family's will.
- e. *"St. Luke's parties kidnapped the infant and other children."* No, St. Luke's was a willful participant in Baby Cyrus's kidnapping seeing as though they were the ones who received Baby Cyrus and kept them in their custody after he was forcefully and illegally kidnapped by Meridian police officers.
- f. *"St. Luke's parties were 'moronic imbeciles' who neglected the Infant."* I wholeheartedly believe this to this day. St. Luke's did not demonstrate a shred of

competence, medically or ethically, in their treatment of Baby Cyrus after he was kidnapped. Baby Cyrus has Cyclical Vomiting Syndrome, and they didn't even properly clean off his face when he vomited causing burn marks to appear on his face as has been shown to the public in pictures taken of baby Cyrus after his parent's first visit with him. Only incompetent and moronic imbeciles would leave a baby ALONE who has Cyclical Vomiting Syndrome and allow him to wallow in his own vomit. That is exactly how St. Luke's treated Baby Cyrus.

- g. *"St. Luke's parties stole the Infant."* Technically, it was Meridian Police who "stole" baby Cyrus, but if someone robbed a bank you only knowingly received the stolen money after another robbed the bank, aren't you still guilty of being an accomplice in the crime? Of course you are! Likewise, St. Luke's is guilty of being the knowing accomplice to Baby Cyrus's kidnapping.
- h. *"St. Luke's changed the infant into someone who was unrecognizable, lethargic, and unresponsive."* This is 100% factually accurate, and these are the very words of Baby Cyrus's own mother. And how would St. Luke's know otherwise? Did they raise him for 10 months prior to his kidnap? Do they have a point of reference to know how Baby Cyrus acted before his kidnap? Only the family, particularly Baby Cyrus's parents, would be qualified to make such a conclusion, not St. Luke's hospital or its staff. And this is the quote from Baby Cyrus's own mother which is one I stand by to this day.
- i. *"St. Luke's failed to keep the infant clean."* This is a fact that is substantiated by both medical records and pictures which have already been published.

- j. *“St. Luke’s caused the Infant ‘suspicious’ brusing.”* This is also true and the pictures of his brusies have already been published.
- k. *“St. Luke’s lied about the Infant’s treatment.”* We definitely still believe this to be true as the doctors were not forthcoming with their treatment, and we didn’t get the unredacted medical records back until January of 2023, nearly 9 months later. That is a significant amount of time to pass which would enable many changes to be made in the medical records and history. And the way that the staff handled the records that Levi (Baby Cyrus’s father) received early on in the process gave the family reason to believe that the records were tampered with since they would not simply print out the records and hand it to Levi—rather, they made him wait and wait until their lawyer had to call and threaten legal action against St. Luke’s for not providing the records.
- l. *“St. Luke’s parties vaccinated the Infant against the family’s wishes.”* I never said that. Though I did question whether they vaccinated Baby Cyrus as he had 4 pricks in his body that are consistent with needle pricks, and were not on Baby Cyrus’s body before he was kidnapped.
- m. *“St. Luke’s parties were ‘medically negligent.’”* I wholeheartedly believe this to be true. On many occasions this was demonstrated to our family. Some examples are (but not limited to): Dr. Natasha Erickson refusing to listen to the parents regarding the medical history of Baby Cyrus, Dr. Natasha Erickson refusing to let Baby Cyrus have an enema when he clearly needed one, St. Luke’s allowing Baby Cyrus to wallow in his own vomit, Nurse Tracy Jungmann forcing an exposed nasal tube back into Baby Cyrus’s nose and stomach without sanitizing it

or replacing it, and Baby Cyrus more-than-likely contracting a C-DIFF infection from St. Luke's hospital.

- n. *"St. Luke's was 'world famous' for 'mistreating people,' 'killing people,' and 'stealing babies from their parents.'"* St. Luke's has certainly earned a reputation for mistreating people as can easily be seen by how they treated their own employees who refused to get the COVID vaccine. Also, anecdotal stories regarding horrible treatment from St. Luke's can easily be acquired by simply asking people to tell you their stories in online forums, social media, or the like. St. Luke's has a horrible reputation which was only exacerbated by their tyrannical actions taken during COVID which certainly included killing many people on ventilators when the public knew that the ventilator protocols they were using would definitely kill the people who were on them. And as has previously been established, while St Luke's hospital does not personally engage in the kidnap of children, they do participate in the process making them an accessory to the crime of kidnap.
- o. *"St. Luke's forced the Infant to take 'toxic poison' which was then allowed to stay in the infant's body for days."* This is in reference to the barium contrast that St. Luke's made Baby Cyrus take which the CDC has already recognized as being a toxic substance (<https://www.cdc.gov/mmwr/preview/mmwrhtml/mm5243a5.htm>) and which caused Baby Cyrus harm and discomfort as noted by Baby Cyrus's parents.

- p. *“St. Luke’s parties changed and falsified information in the medical records to protect themselves.”* I still believe this to be true for the reasons stated above in sub-paragraph K.
- q. *“Mr. Roth was guilty of criminal accessory of child abduction and deprivation of rights under color of law.”* I do not remember saying this, nor do I believe that I said it. However, I do agree that St. Luke’s hospital is a criminal accessory to kidnapping as defined by Idaho State Statue § 18-4501 and explained in section 54 above in this response.
- r. *“Mr. Roth personally profited from the pandemic.”* I believe this to be true by simply comparing the income of Mr. Roth before the pandemic to his income after St. Luke’s had received “COVID monies” from the federal government (and comparing said income with other executive staff members before Mr. Roth), one can conclude easily that Mr. Roth did, in fact, profit and benefit personally from the pandemic.
- s. *“Dr. Erickson was responsible for the Infant’s kidnapping.”* Dr. Erickson was the one who first initiated contact with CPS as already noted in section 57 above. For that reason, one can conclude that she bears a measure of responsibility for the entire scenario since she used her position as a doctor and someone who CPS responds to as a weapon to get her way, in evident total disregard for the actual safety and wellbeing of Baby Cyrus.
- t. *“Dr. Erickson participated in kidnapping ‘hundreds of children’ with the help of a judge.”* I definitely believe this to be true, though it could be “thousands” and not “hundreds.” If this case is not rightfully dismissed as being a frivolous

lawsuit, then discovery on this case will demonstrate just how many children have been referred to CPS by Dr. Natasha Erickson and just how much money St. Luke's hospital has received for having these children in their custody after they were kidnapped. And not just Dr. Natasha Erickson, but ALL of St. Luke's doctors and staff—we will find out how the staff of an organization who receives compensation for having kidnapped babies in its custody regularly and inappropriately uses this power to be financially rewarded. This type of setup, by the way, in any other industry would be considered a “conflict of interest” and would not be allowed. And in some industries, this type of conflict of interest where “authorities” are financially incentivized to make false or otherwise unethical claims or to give advice that they receive compensation for, is a punishable criminal offense.

- u. *“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.’”* This is demonstrably true as I have already shown above that other infants in St. Luke's custody have, in fact, lost their lives due to St. Luke's decisions and incompetence.
- v. *“The hospital made the Infant ‘more sickly.’”* This is also true and has already been demonstrated by pictures of Baby Cyrus after he was returned to his parents, and by the testimony of his parents who know better than anybody about the condition of their own child.
- w. *“Followers should put ‘physical pressure’ on those ‘that are causing the problem.’”* I never said this.

- x. *“Followers should disrupt St. Luke’s operations by protesting, calling in, donating money, making noise, and giving the hospital ‘hell.’”* There is not a single one of those things that are illegal or malicious. What is malicious is kidnapping a baby from his parents and endangering that child by keeping him away from his only source of nutrition (his mother’s breastmilk), and doing so because you are financially compensated by the government. That is evil, wicked, and illegal.
- y. *“God should crush the necks of those that are evil.”* I certainly do not remember saying this, nor is it in line with something that I would typically say since it is not an actual Bible scripture or a biblical quotation, which I would generally use. However, I am happy to claim it since I do agree that “God should crush the necks of those that are evil.” If someone does not want to face God’s wrath, they simply should not be evil. And if someone wants forgiveness, they can simply repent of their sins and wicked deeds. And in the case of St. Luke’s and the bad actors who were responsible for Baby Cyrus’s kidnapping, even my family is prepared to forgive all of those involved in his vicious, vile, violent, and unconscionable kidnapping.

59. PARAGRAPH 94 – If there was a disruption to St Luke’s operations that is St. Luke’s fault for participating in child trafficking. They bear the sole responsibility for the consequences of their actions.

60. PARAGRAPH 96 – There was not a single defamatory remark made at my press conferences in front of the hospital, and the plaintiffs have failed to provide any evidence of one. Again, this only demonstrates the frivolous nature of this unconscionable lawsuit.

61. PARAGRAPH 97 – I am not aware of anybody harassing patients or staff, and I certainly never incited anybody to do so. In fact, I would be completely opposed to such harassment if it ever occurred. But again, St. Luke’s is responsible for the consequences of their own actions, and let’s consider the “anxiety and fear” that they have caused over the years for all of the families they have threatened with CPS, or who have had their children kidnapped by CPS because of St. Luke’s inappropriate referrals, or of all of the employees of St. Luke’s who were fired and lost their livelihoods for not taking the COVID vaccine, or of all the families whose loved ones were killed by ventilators that St. Luke’s put them on, or of the total fear and anxiety of the confused minors whose genitals are mutilated by St. Luke’s hospital in disgusting sex change operations that are performed there (being one of only 13 hospitals in the country that we know about who performs such disgusting genital mutilation processes).

62. PARAGRAPH 98 – This is a completely erroneous allegation. I, nor Ammon, nor anybody can “go so far as to cause St. Luke’s to go into lockdown.” That is a decision that St. Luke’s itself would have to make and it is one that we know they made in order to garner public support in their favor—since we had learned from many whistleblowers on the inside of St. Luke’s and from the general sentiment of the public at large, that St. Luke’s had already lost respect and support both in public and internally with their own employees. St. Luke’s therefore had to create a “false flag” in order to turn public support back in their favor and therefore they created this false idea that there was some sort of threat that caused the hospital to go into lockdown. When this “lockdown” took place, we understood immediately that St. Luke’s was trying to create this false narrative in order to garner public support, so we had some people go around at that very moment

to film the protestors and to capture the exact scene outside of St. Luke's hospital at the moment they claimed they were under threat. This video can be seen as video #4 on this page <https://www.freedomman.org/cyrus/videos/>, and it clearly shows that St. Luke's is simply lying. The video shows mothers with strollers, grandparents, and genuinely peaceful protestors with signs on public sidewalks, who neither posed a threat, nor set foot on St. Luke's private property. St. Luke's has simply demonstrated their own wickedness once again!

63. PARAGRAPH 100 – it would be impossible to ascertain the level of financial ruin that parents and families experience after having their children illegally kidnapped. And most American citizens with decency automatically recognize this level of devastation and want to help with financial support. To this end, a GiveSendGo campaign was setup to help Marissa and Levi, and people voluntarily and graciously donated to their cause.
64. PARAGRAPH 102 – there was not a single defamatory remark ever made and the plaintiffs have still failed to produce any evidence of a single defamatory remark.
65. PARAGRAPH 103 – Solicitations for donations were made on the premise of people wanting to help with legal expenses and the family's expenses and never did I claim that the donations were going to pay St. Luke's medical bills! On the contrary, we would never ask people to donate money to pay off an entity who was an accessory to Baby Cyrus's kidnap in the first place! However, I do believe wholeheartedly, and there is sufficient evidence to build the case that allopathic hospitals like St. Luke's structure all of their protocols specifically to maximize their own profitability and not to ensure their patients' health.

66. PARAGRAPH 104 – This paragraph is a tacit admission on behalf of St. Luke’s that they do, in fact, receive compensation from the Federal Government for having Baby Cyrus in their custody. Once in their custody, they knew they could perform any treatment, test, or “service” on him that they chose, and that it would all be paid for by the government. They knew this “free money” was available to them, and they admit it right here in paragraph 104!

67. PARAGRAPH 105 – These statements are in direct contradiction with the testimony of the parents themselves. Levi and Marissa were not made aware that their costs were being covered by government assistance and would not have wanted such assistance if they were made aware of it. It is evident that the only one who wanted this government assistance was St. Luke’s so they could use Baby Cyrus like a debit card, simply scanning his barcode (they literally put a barcode on his wrist), and ordering up every test, service, or “treatment” available so that they could financially profit off of Baby Cyrus with “free money” from the government.

68. PARAGRAPH 106 – Levi and Marissa are an honest, hard working family and did not want any assistance from the government so it is irrelevant that a patient financial advocate tried to get them to sign up for Medicaid. It only demonstrates that St. Luke’s true concern was making money off of Baby Cyrus.

69. PARAGRAPH 107 – Marissa and Levi never applied for Medicaid meaning that St. Luke’s or some agency connected to St. Luke’s made this application without parental consent and did so in order to financially profit off of Baby Cyrus.

70. PARAGRAPH 108 – The kidnapping of Baby Cyrus did absolutely create huge financial liabilities for the Anderson family. This is including but not limited to: loss of income

from inability to work, legal expenses, logistical expenses, new medical expenses (not from St. Luke's but from other providers who had to fix St. Luke's errors) and more.

71. PARAGRAPH 114 – I will never cease to publish and proclaim the reality and the wickedness of government subsidized child trafficking. It is real. It is going on every day in America. It happens nearly 4 times per day in Idaho. St. Luke's is profiting off of it as is the Idaho Department of health and Welfare. And it is my Constitutional right to be able to publish these facts to the world and I will do so, whether I am dead or alive, I will ensure that the publications go on.
72. PARAGRAPH 115 – The People Against Child Trafficking is also not a legal entity. It was simply the name we gave to a conference/seminar/meeting that we had to expose everything we had learned in the process of Baby Cyrus's kidnapping.
73. PARAGRAPH 118 – Every statement (“a” through “d”) is accurate and I stand by them to this day.
74. PARAGRAPH 120 – As has already been demonstrated multiple times, no “defamatory speech” was used, and the plaintiffs have failed to provide a single shred of evidence to the contrary.
75. PARAGRAPH 126 – This is true and has already been explained repeatedly in this response.
76. PARAGRAPH 127 – Not only is it true that St. Luke's has profited off of the false kidnapping of Baby Cyrus, but they have admitted to it in their very complaint (by stating that they were paid by Medicaid for Cyrus), and new records demonstrate that they were compensated at least \$34,000 for having Baby Cyrus in their custody.

77. PARAGRAPH 128 – This must be in reference to the StLukesExposed.com website which I have created where I do state that St. Luke’s is corrupt and wicked because it is both demonstrably true and also my opinion, which I wholeheartedly believe and can support with evidence.
78. PARAGRAPH 138 – First of all there, is no legally defined concept of “hate speech” in the State of Idaho. Nevertheless, my statements regarding homosexuals or members of the so called “LGBTQ+” community are not based in hate or malice, rather they are factual statements based on the Bible. It is apparent that counsel for the plaintiffs is personally offended by such speech, most likely because he is member of that community.
79. PARAGRAPH 139 – The evidence shows that the government subsidized child trafficking ring, while historically have focused on preying on the poor and “minorities,” have made a significant shift toward preying on people of faith—particularly and specifically on people of faith who reject government propaganda and dogma and who choose to homeschool their children, reject vaccinations, and reject homosexuality. It is also a statistical fact that there is a disproportionate number of atheists, homosexuals, transvestites, and other communities of people who are hostile to Christianity who work at the Idaho Department of Health and Welfare and who have unchecked power over the lives of Christian people, up to and including the ability to illegally and immorally kidnap their children.
80. PARAGRAPH 141 (RESPONSE TO COUNT I) – The plaintiffs have failed to provide a shred of evidence that any statement or verbal pronouncement that I have made regarding

them was false. Therefore this entire lawsuit is a sham, and it is frivolous and unconscionable.

- a. This is true and I already responded to it above. Furthermore, plaintiffs have failed to provide any evidence that these statements were false or that I knew they were false and knowingly stated them in order to harm them.
- b. This is true and I already responded to it above.
- c. This is true and I already responded to it above.
- d. *“Defendants falsely and publicly accused Plaintiffs of kidnapping children.”* As clarified above, I have accurately and publicly accused Plaintiffs of participating in child kidnap as defined by Idaho State Statute.
- e. There were no threats to Plaintiffs that I caused. If someone else threatened or harassed St. Luke’s, then you can sue them for harassment.
- f. I was not involved in the publication of these fliers, but I do support it.
- g. Everything stated on the Freedom Man Press website is accurate. Furthermore, plaintiffs have failed to provide any evidence that these statements were false or that I knew they were false and knowingly stated them in order to harm them.
- h. It is true that Dr. Natasha Erickson reacted negatively to Marissa and Levi choosing not to vaccinate Baby Cyrus, and likewise, it is also true that the day after she threatened to call CPS for not obeying her, a social worker from CPS did visit Marissa in the hospital to interview her.
- i. I do believe and am still of the opinion that Dr. Erickson is incompetent at her profession for the reasons already stated above in this response.
- j. I have already provided proof that St. Luke’s does kill babies.

- k. This is a statement from Ammon, not me, but I believe that Ammon is correct in his assertion.
- l. These statements are conflated and confused. But, it is true that Nurse Jungmann does receive compensation from St Luke's hospital, who likewise receives compensation from child kidnapping as has already been demonstrated. It is also true that at the so-called CARES unit where Nurse Jungmann works, these nurses commonly inspect the genitals of little children who are complete strangers.
- m. Nurse Jungmann never once reviewed, viewed, or diagnosed Baby Cyrus in person. Yet, she gave the diagnosis of "imminent danger" to the Meridian Police which was the claim necessary to give the police cover in order to kidnap Baby Cyrus. This diagnosis was demonstrably false, and it is definitely inappropriate and what I could consider "medical malpractice" to make a life-altering medical diagnosis over the phone, through a third party, without ever having looked at a patient in person.
- n. St. Luke's was involved in the kidnapping of Baby Cyrus for profit and that has already been demonstrated with evidence in the public domain and by St. Luke's own admission in this very complaint.
- o. I do believe St. Luke's, along with all other allopathic hospitals in the country, are connected to what can only be described as a "medical mafia." It consists of Big Pharma companies like Pfizer and others, and it is responsible for being the 3rd highest cause of deaths in America.
- p. This was stated by Ammon, not me, but I do believe Ammon was correct in his assertion.

- q. This allegedly was stated by Ammon, not me, but I don't believe he actually made this statement.
- r. This was stated by Ammon, not me, but I do believe Ammon was correct in his assertion.
- s. This was stated by Ammon, not me, but I do believe Ammon was correct in his assertion.
- t. This was stated by Ammon, not me, but I do believe Ammon was correct in his assertion.
- u. This is true and I already responded to it above. Furthermore, plaintiffs have failed to provide any evidence that these statements were false or that I knew they were false and knowingly stated them in order to harm them.

81. PARAGRAPH 142 – These statements were all true or I believe them to be true, as explained above.

82. PARAGRAPH 143 – Both at the time that I made these statements and still to this day, I know these statements to be true, and I can substantiate them all with evidence, which have already been published in the public domain and can be seen at the website FreedomMan.org/cyrus.

83. PARAGRAPH 145 – I made all of the published statements with the intent to expose the truth.

84. PARAGRAPH 146 – Not only is this not true as an accusation, but it's also not true as a matter of fact since no defendant in this case has earned a single penny of financial gain from this process; rather, on the contrary, we have all suffered financially as a result.

85. PARAGRAPH 147 – The statements are all factually accurate so they are not defamatory at all, neither *per se* nor *per quod*.
86. PARAGRAPH 149 – I cannot be held responsible for what others may or may not do in response to the publication of factually accurate information.
87. PARAGRAPH 150 – I have never used any hate speech, which is a term that does not exist or have any legal definition, but if any member of the so-called “LGBTQ+” community is offended by me mentioning Biblical truths in regards to their sin, the proper response is not to whine, complain, moan, or sue, but rather to repent and serve Jesus Christ.
88. PARAGRAPH 152 – Plaintiffs are knowingly, intentionally, willfully, and maliciously making false allegations against me. I have not made a single false statement about them, I have proven it by publishing the evidence to substantiate my claims, and have given them the opportunity to share their evidence and earn a public apology and retraction(s) from me; yet they have failed to provide a single solitary shred of evidence—only demonstrating again that this case is entirely frivolous and not based on any factual evidence whatsoever. The case should be dismissed immediately.
89. PARAGRAPH 154 – I have published no false information whatsoever.
90. PARAGRAPH 155 – No statements that I’ve made were false, nor did I ever knowingly state any false information.
91. PARAGRAPH 156 – Any exposure of truth that shed light on any of the plaintiffs in this case did not put them in a “false light” but in “true light.” I can’t help it if evil people and evil entities don’t like it when light is shined on their darkness. **John 3:19** “*And this*

is the condemnation, that light is come into the world, and men loved darkness rather than light, because their deeds were evil.”

92. PARAGRAPH 157 – At the time I made the statements I have made I knew them to be true and accurate and still know them to be true and accurate.

93. PARAGRAPH 160 – Not a single act that I partook in was done with any malice nor was any of it false. However, because plaintiffs knowingly are lying about all of their allegations against me, they are weaponizing this very court to use as a tool to destroy me financially, and have even said so in private to others who have relayed the information to at least one Ada County Commissioner who has shared their statements with a member of my family, then this case should be rightfully noted as frivolous, heinous, unconscionable and shocking to the public conscience and to all humans with decency.

94. PARAGRAPH 162 – I have not acted in any extreme or outrageous conduct. How on earth could fighting through peaceful means to restore your grandson to his family after he was illegally kidnapped by force by people who were financially incentivized to kidnap him be considered “extreme or outrageous.” On the contrary, what is extreme and outrageous is for an entity or system to be financially incentivized to steal and kidnap children through violent methods, and to willfully participate in such a system while destroying the lives of innocent people. That is extreme and outrageous conduct and that goes way beyond the bounds of any decency in any civilized society. Kidnapping babies and getting paid for participating in such kidnapping is disgusting and outrageous. But peacefully protesting and publishing factual information is not extreme nor outrageous at all. In fact, it is common sense and reasonable. Furthermore, attempting to use the American justice system as a weapon to silence those who have exposed your wickedness

is so far beyond the pale, so outrageous and so extreme, that the public have already deemed it and judged it to be evil, wicked, and diabolical. Once again, the plaintiffs and their counsel are demonstrating textbook “projection,” where they are accusing me of doing exactly what they are doing.

95. PARAGRAPH 173 – The plaintiffs and their counsel simply can’t stop lying. There wasn’t any revenue generated for any defendant in this case, period.

96. PARAGRAPH 174 – I was never asked to leave St. Luke’s property at any point in time. Furthermore any and all protesting was done on public sidewalks and not on St. Luke’s property. Had I mistakenly been on St. Luke’s property and had they asked me to leave their property, I would have done so. They are simply intentionally distorting facts to create a false narrative.

97. PARAGRAPH 175 – I never once blocked access to the hospital or disrupted hospital operations with my physical presence outside of the hospital. This is a bald-faced lie and the plaintiffs know it, but evidently don’t have enough respect for the judge, the future jury, or the American justice system to tell the truth.

98. PARAGRAPH 185 – Any time spent near St. Luke’s property was for the proper purpose of protesting against the illegal kidnapping of my grandson.

99. PARAGRAPH 188 – Again, I was never asked to leave St. Luke’s property at any point in time. Furthermore, any and all protesting was done on public sidewalks and not on St. Luke’s property. Had I mistakenly been on St. Luke’s property and had they asked me to leave their property, I would have done so. They are simply intentionally distorting facts to create a false narrative.

100. PARAGRAPH 189 – Again, I never once blocked access to the hospital or disrupted hospital operations with my physical presence outside of the hospital. They are repeating the same lie as in paragraph 175.
101. PARAGRAPH 190 – My presence outside of St. Luke’s hospital did not interfere with St. Luke’s ability to provide any service to any other client. That is a complete lie.
102. PARAGRAPH 191 – This paragraph shows the corrupt and twisted nature of the plaintiffs complaint and false allegations. They are now asking for damages from “each defendant” even though they have previously claimed that the defendants are indistinguishable from Ammon and I. In my case, they are claiming Freedom Man PAC (which was a registered Political Action Committee in Idaho), Freedom Man Press, LLC (which does not exist as a legal entity and to which the plaintiffs admit does not exist), and Diego Rodriguez (the individual being myself) should each pay an amount no less than \$250,000. This is such an obvious “scam tactic” which is designed to triple the financial attack against me by forcing my actions to be placed on other entities which either don’t exist or were not involved. This is such a blatant abuse of the court system that it goes beyond the bounds of decency in a civilized society. If the court system was honest, true, and legitimate, this case would only have two defendants: Ammon Bundy and Diego Rodriguez. Previous to now, I assumed the addition of the additional entities, particularly two of them which don’t even exist (Peoples Rights Network and Freedom Man Press, LLC do not exist as legal entities) was simply another demonstration of incompetence on behalf of the plaintiff’s counsel. Now I see that it was part of the plan to triple the requested reward by forcing Ammon and I to pay triple for entities that don’t exist or were not a part of the lawsuit.

103. PARAGRAPH 193 – I have never once engaged in political activism for financial gain and would never do so as it is contrary to my personal beliefs and convictions. So this is another outright lie.
104. PARAGRAPH 195 – I have never once used the story of Baby Cyrus to advertise for Power Marketing. That is a bald-faced lie, and there is not a shred of evidence that I have ever done so. The plaintiffs and their counsel have told so many outright lies that it is completely outrageous and no rational nor decent human being could imagine doing so.
105. PARAGRAPH 196 – This assertion again shows the incompetence of plaintiff’s counsel in claiming that “FMP” which is “Freedom Man Press” “owns and operates FreedomMan.org.” First of all, in paragraph 18, the plaintiffs already admit that they have searched for “Freedom Man Press, LLC” and have determined that it does not exist as it is “not registered as an LLC in Idaho or registered to do business in Idaho.” That is because the entity “Freedom Man Press, LLC” does not exist and I have already testified, under oath, to this fact in a deposition with the plaintiff’s counsel present and asking the questions. Furthermore, I have never earned a dime directly or indirectly for the existence of FreedomMan.org, which is my personal blog that I personally control and own, and I never will use it as a vehicle to generate revenue as I see it as a personal mission and call from God to use this website/platform as a tool to proclaim truth and expose corruption. Once again, the plaintiffs are making false allegations without any evidence or knowledge of the facts.
106. PARAGRAPHS 201 & 202 – The plaintiff again is engaging in more “throwing mud at the wall in the hope that some of it will stick.” There is nothing in Idaho Code § 48-603C that even remotely pertains to this case. The statute plainly states, “48-603C.

UNCONSCIONABLE METHODS, ACTS OR PRACTICES. (1) Any unconscionable method, act or practice in the conduct of any trade or commerce violates the provisions of this chapter whether it occurs before, during, or after the conduct of the trade or commerce. (2) In determining whether a method, act or practice is unconscionable, the following circumstances shall be taken into consideration by the court: (a) Whether the alleged violator knowingly or with reason to know, took advantage of a consumer reasonably unable to protect his interest because of physical infirmity, ignorance, illiteracy, inability to understand the language of the agreement or similar factor; (b) Whether, at the time the consumer transaction was entered into, the alleged violator knew or had reason to know that the price grossly exceeded the price at which similar goods or services were readily available in similar transactions by similar persons, although price alone is insufficient to prove an unconscionable method, act or practice; (c) Whether the alleged violator knowingly or with reason to know, induced the consumer to enter into a transaction that was excessively one-sided in favor of the alleged violator; (d) Whether the sales conduct or pattern of sales conduct would outrage or offend the public conscience, as determined by the court.” Nothing in this law pertains to the Baby Cyrus case or any of the facts alleged in this case as we have not sold any product or service to any citizen of Idaho. As has already been demonstrated, the only unconscionable acts that have taken place in the context of this case are the acts performed by the plaintiffs in participating in the kidnap of my grandson and subsequently filing this frivolous lawsuit which is a textbook example of a “SLAPP” suit against those of us who they harmed.

107. PARAGRAPH 203 – Again, there is not a single shred of evidence that actions or proclamations that I have made are misleading false or deceptive. On the contrary, this entire lawsuit is misleading, false, and deceptive—while all the statements I have made are factually accurate, true, and provable with evidence already published and available in the public domain.
108. PARAGRAPH 204 – Our conduct and pattern of conduct are not outrageous and offensive to the public conscience, on the contrary, **kidnapping children and being paid to participate in it is outrageous and offensive to the public conscience.**
109. PARAGRAPH 208 – The plaintiffs are falsely asserting that donations were solicited on behalf of Baby Cyrus’s parents so they could pay medical bills owed to SLHS and SLRMC. This is a flat out lie, and we never solicited donations for this purpose as I have already stated above in this response. Nevertheless, this paragraph 208, again demonstrates that St. Luke’s hospital admits to receiving compensation from “government programs” for whatever they claimed to have done to Baby Cyrus.
110. PARAGRAPH 209 – This is another outright lie. I never used any unfair, false, deceptive, misleading, or unconscionable acts and practices. On the contrary, people of good conscience and faith all around the world willfully and happily made donations on their own free accord because they saw the acts of St. Luke’s hospital, the Idaho Department of Health and Welfare, the Meridian Police department and all other bad actors pertaining to Baby Cyrus’s kidnapping as being unconscionable acts and practices!
111. PARAGRAPH 210 – As already noted, we never falsely represented the amount of liability incurred relating to medical expenses associated with treating Baby Cyrus. The plaintiffs are again just engaging in willful and malicious lying. And I can assure you

that the Anderson family would never have given any money to St. Luke's hospital after they participated in his kidnap. You don't reward accomplices to kidnapping with compensation!

112. PARAGRAPH 215 – Again, it was St. Luke's hospital and the plaintiffs who engaged in unconscionable acts and methods, not me.
113. PARAGRAPH 216 – Nothing I ever stated was misleading, false, or deceptive, but it was all true or something I believed and still believe to be true.
114. PARAGRAPH 217 – No, kidnapping children for profit is outrageous and offensive to the public conscience.
115. PARAGRAPH 218 – How do you “donate wrongfully?” Decent and godly people all around the country donated on their own freewill and free accord after watching video evidence and reading and seeing evidence with their own eyes how Baby Cyrus was illegally, immorally, and unconscionably kidnapped. Not a single donor has complained about their donation being used to help the Anderson family. On the contrary, everyone is grateful and thankful to have been a part of restoring Baby Cyrus to his family.
116. PARAGRAPH 220 – The only ones who have misled the public are the bad actors who were responsible for the kidnapping of Baby Cyrus. And this includes all of the false allegations made by the plaintiffs in this very lawsuit.
117. PARAGRAPHS 222 – 227 – Not a single word that I have spoken relating to the Baby Cyrus case or story was false, misleading, or deceptive. This lawsuit is frivolous as has been demonstrated in this response on multiple occasions. Not a single allegation has been substantiated with evidence, and the plaintiffs have rejected my public offer to retract any false claims I have made and offer retractions to each plaintiff individually if

they could simply demonstrate or produce any evidence that any claim I have made was false and that I knowingly proclaimed and spread false information. Their failure to provide any evidence only demonstrates that they know the entire case is a fraud, and they are hoping that they can mislead the public with this frivolous SLAPP suit and intimidate any other whistleblowers from exposing their wickedness, corruption, and unconscionable acts of evil.

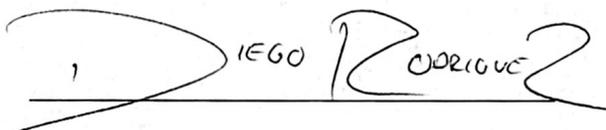
CERTIFICATION UNDER PENALTY OF PERJURY

I certify under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

Date: MARCH 15, 2023

DIEGO RODRIGUEZ

Typed/printed



Signature

CERTIFICATE OF SERVICE

I certify I served a copy to: (name all parties or their attorneys in the case, other than yourself)

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974

By Mail

By fax

By Email/iCourt/eServe:
efstidham@hollandhart.com

Date: MARCH 15, 2023



Signature

DIEGO RODRIGUEZ
Typed/printed Name of Party Signing