

Diego Rodriguez  
1317 Edgewater Drive #5077  
Orlando, FL 32804  
(208) 891-7728

**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

**FIRST SET OF INTERROGATORIES  
TO PLAINTIFFS**

Defendant Diego Rodriguez, hereby requests Plaintiffs, 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, answer all interrogatories and produce all documents for inspection and/or copying  
in accordance with the Instructions and Definitions set forth below within thirty (30) days from

the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below to my address at 1317 Edgewater Dr #5077, Orlando, FL 32804. Digital material may be sent via email to [freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com). As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

### **III. GENERAL INSTRUCTIONS**

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each

individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. DEFINITIONS**

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean any of the Plaintiffs named in this lawsuit (St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman,), and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network. This is simply because the lawsuit names these as defendants even though “Peoples Rights Network” and “Freedom Man Press LLC” don’t exist.

g. “Complaint” refers to the Fourth Amended Complaint filed by Plaintiffs on March 3, 2023, Ada County Case No. CV01-22-06789.

h. “Answer” refers to any answer to any Complaint/Answer filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

l. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any

medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide

the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and
- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification. o.

"Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.

p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.

q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.

s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.

t. "Infant's Parents" shall mean the natural parents of the Infant.

u. "PCP" shall mean the Infant's primary care provider whose services are or were



provided at Functional Medicine of Idaho.

v. “Immediate Families” shall include the person’s spouse, children, children’s spouses, and grandchildren.

w. “DHW” shall mean the Idaho Department of Health and Welfare.

## **V. INTERROGATORIES**

INTERROGATORY NO. 1: Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

INTERROGATORY NO. 2: Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Defendant’s discovery requests.

INTERROGATORY NO. 3: Please Identify each Person You have interviewed or had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

INTERROGATORY NO. 4: Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

INTERROGATORY NO. 5: If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;

(c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;

(d) The dates any written reports were prepared concerning the subject matter of this action; and

(e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

INTERROGATORY NO. 6: Please Identify all photographs, video tapes, recordings, contracts, agreements, notes, executed documents, drafts, emails, correspondence, files, records, memoranda, analyses, or other documents or communications known to You, Your attorney, or other representative, that tend in any way to support, evidence, corroborate, or contradict the allegations in this lawsuit.

INTERROGATORY NO. 7: Please provide the total figures and documentation demonstrating the amount of monies, compensation, or payments St. Luke's Hospital has received for having Baby Cyrus in their custody. You must include all monies received from the Idaho Department of Health and Welfare, Medicaid, Medicare, and any or all payments or monies received from any government agency or otherwise which were received by St. Luke's as a result of having Baby Cyrus in their custody.

INTERROGATORY NO. 8: Please provide the total figures and documentation demonstrating how much money St. Luke's hospital receives on an annual basis, for the last 5 years (2018, 2019, 2020, 2021, 2022, and 2023 up to the current date) from the Idaho Department of Health and Welfare. Please separate on a line item how much of that money is received for payments or compensation which arise as a result of having children from CPS

(meaning that they are wards of the state through the Idaho Department of Welfare) in St. Luke's custody or possession.

INTERROGATORY NO. 9: Please provide copies of the application forms filled out to get Medicare, Medicaid, or any other government assistance for payments for Baby Cyrus. Please identify the people involved in filling out those forms and making those applications without the parent's permission or approval.

INTERROGATORY NO. 10: Please provide detailed information regarding how many children have been referred to CPS by Dr. Natasha Erickson over the last 10 years. It is understood that the identification of children, parents, and/or patients may be restricted by HIPPA laws or otherwise, but please provide the detailed information in terms of why CPS referrals were made and how many referrals have been made.

INTERROGATORY NO. 11: Please provide detailed financial records regarding how much money, payments, or compensation St. Luke's Hospital has received as a result of having the children who were referred to CPS by Dr. Natasha Erickson in St. Luke's custody.

INTERROGATORY NO. 12: Please provide copies of Dr. Natasha Erickson's tax returns for the last 5 years.

INTERROGATORY NO. 13: Please provide copies of Chris Roth's tax returns for the last 5 years.

INTERROGATORY NO. 14: Please provide copies of Nurse Tracy Jungmann's tax returns for the last 5 years.

INTERROGATORY NO. 15: Please provide a description of what a typical physical examination by Nurse Tracy Jungmann is like when she examines children at the CARES center

who have been referred by CPS or who are later referred to CPS and how many children who are in CPS custody or end up in CPS custody are examined by Nurse Tracy Jungmann each month, for the last 5 years.

INTERROGATORY NO. 16: Please provide the amount of money/compensation Dr. Natasha Erickson has received directly or indirectly from the Idaho Department of Health and Welfare each year.

INTERROGATORY NO. 17: Please provide the amount of money/compensation Nurse Tracy Jungmann has received directly or indirectly from the Idaho Department of Health and Welfare each year.

INTERROGATORY NO. 18: Please provide copies of all internal email communications which mention Baby Cyrus, the family, or the Baby Cyrus case, or that mention Diego Rodriguez, Freedom Man Press, Freedom Man PAC, Ammon Bundy, or People's Rights.

INTERROGATORY NO. 19: Please Identify any records, communications, correspondence, or other documents which were used, produced, or disseminated relating to the Baby Cyrus case that were used or disseminated internally within St. Luke's Hospital, and any external documents or communications with any other agency, including but not limited to: Office of the Governor of Idaho, any politician in Idaho, Idaho Attorney General's office, Meridian Police Department, Federal Bureau of Investigation, or any other.

INTERROGATORY NO. 18: Please provide copies of any and all meeting notes from staff meetings or any other conversations regarding Baby Cyrus or the Baby Cyrus case.

INTERROGATORY NO. 19: Please provide security footage from the Ambulance Bay during the dates and times noted where St. Luke's alleges to have needed to lockdown the hospital because of an alleged imminent danger from protestors.

INTERROGATORY NO. 20: Please provide the number/quantity of people who died at St. Luke's hospitals while put on ventilators between March 2020 through March 2023.

INTERROGATORY NO. 21: Please provide the total number of people who died at St. Luke's during the COVID pandemic from March 2020 through March 2023.

INTERROGATORY NO. 22: Please provide the amount of money/compensation that St. Luke's has received from the CARES act and all other government payments for any COVID related program, system, subsidy, or any other payment which was received related to the COVID pandemic.

INTERROGATORY NO. 23: Please provide a detailed comparison between Chris Roth's annual compensation compared to previous annual compensation for previous CEOs for the last 10 years from 2012 through 2022.

INTERROGATORY NO. 24: Please provide the number of patients or people who died at St. Luke's Hospital while being administered Remdesivir during the COVID pandemic.

INTERROGATORY NO. 25: Please provide the amount of compensation that St. Luke's has received for administering/using Remdesivir for their clients/patients, including compensation from private insurance, government subsidies, Medicare and/or Medicaid payments, and any other payments received as a result of administering Remdesivir.

INTERROGATORY NO. 26: Please provide the number of minors who have died at St. Luke's hospital annually for the last 10 years.

INTERROGATORY NO. 27: Please provide details of any and all complaints issued against St. Luke's hospitals for medical malpractice, medical negligence, or any other lawsuits, complaints, referrals, or likewise demonstrating incompetence, errors, or problems with St. Luke's doctors, nurses, or staffs.

INTERROGATORY NO. 28: Please provide the number of employees St. Luke's has terminated for not being vaccinated.

INTERROGATORY NO. 28: Please provide any internal communications, emails, meetings notes, or records of conversations concerning the COVID vaccine, how it was to be used, what St. Luke's knew about its use, the testing data, legal ramifications, and more that was used in order to create St. Luke's policies and protocols for the use of the vaccine with the public (the administration of the vaccine to citizens) and the mandates given to St. Luke's employees.

## **VI. REQUESTS FOR PRODUCTION**

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, or discussed in Your responses to the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

REQUEST FOR PRODUCTION NO. 2: Please produce each and every document that You referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith.

REQUEST FOR PRODUCTION NO. 3: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 5: Please produce all documents, including, but not limited to emails and text messages or other ESI, which relate to the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 6: Please produce all correspondence and communications relating to Defendants, this lawsuit, or any facts relating to the allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 7: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents provided by You to any expert retained by You to form any opinions related to the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 10: Please produce all documents considered or relied upon by any expert retained by You to form any opinions related to the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 11: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 13: Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

REQUEST FOR PRODUCTION NO. 14: Please produce all documents, specifically including text messages, emails, recorded interviews, or other communications, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 15: Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

REQUEST FOR PRODUCTION NO. 16: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint or Answer.

REQUEST FOR PRODUCTION NO. 17: Please set forth in detail any written or recorded statement(s) taken by You, Your attorneys, or Your representatives, from any Person concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 18: Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

REQUEST FOR PRODUCTION NO. 19: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.



REQUEST FOR PRODUCTION NO. 20: Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: “Baby Cyrus” or “Cyrus” or “St. Luke’s” or “Erickson” or “Roth” or “Jungman,” “Diego Rodriguez,” “Ammon Bundy,” “Bundy,” or “Freedom Man,” including any misspellings of the same.

REQUEST FOR PRODUCTION NO. 24: Please produce all documents or communications You or any of Your agents received from the Meridian Police Department, Idaho Department of Health and Welfare, or the Federal Bureau of Investigation, relating to the Baby Cyrus case.

REQUEST FOR PRODUCTION NO. 29: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to Persons between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications exchanged with the Governor of Idaho, the Governor’s office, the offices of any sitting politician, statesman, Senator, House Representative, Police Agency or their officers, the Idaho Department of Health and Welfare or their staff, and the Federal Bureau of Investigation.

REQUEST FOR PRODUCTION NO. 30: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that relate to the issues described in the Complaint.

REQUEST FOR PRODUCTION NO. 32: To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: March 17<sup>th</sup>, 2023

Date: 3/17/2023

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

Date: 3/17/2023

 DIEGO RODRIGUEZ

Signature

Typed/printed Name of Party Signing