

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF ERIK STIDHAM IN
SUPPORT OF PLAINTIFFS' MOTION
TO COMPEL COMPLIANCE WITH
SUBPOENAS AS TO POWER
MARKETING CONSULTANTS LLC,
POWER MARKETING AGENCY, LLC,
AND FREEDOM TABERNACLE,
INCORPORATED**

I, Erik F. Stidham, declare and state as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. Attached hereto as **Exhibit A** are true and correct copies of emails I sent to Defendant Diego Rodriguez seeking to confer with him regarding the subpoenas that were served on Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated (collectively, the “Rodriguez Third-Party Entities”). To date, Rodriguez has not responded.

3. Attached hereto as **Exhibit B** is a true and correct copy of the Notice of Intent to Serve Subpoena Duces Tecum to Power Marketing Agency, LLC, that was served December 27, 2022.

4. Attached hereto as **Exhibit C** is a true and correct copy of the subpoena to Power Marketing Agency, LLC.

5. Attached hereto as **Exhibit D** are true and correct copies of a Declaration and Affidavit of Non-Service outlining the attempts that were made to serve Power Marketing Agency, LLC and showing that it was served via Certified Mail.

6. Attached hereto as **Exhibit E** is a true and correct copy of a screenshot of the Idaho Secretary of State website showing the address for Power Marketing Agency, LLC. That address is a virtual address.

7. Attached hereto as **Exhibit F** are true and correct copies of Idaho Secretary of State filings that were filed January 6, 2022, on behalf of Power Marketing Consultants LLC and

Freedom Tabernacle, Incorporated, showing the address for their registered agents as 1876 E. Adelaide, Meridian, ID 83642.

8. Power Marketing Agency, LLC never responded to the subpoena, it never contacted Plaintiffs' counsel regarding the subpoena, and it never filed any motions seeking to quash or modify the subpoena. Accordingly, Plaintiffs' counsel prepared for the deposition, hired a videographer and a court reporter, and appeared at the deposition on the scheduled date and time. Power Marketing Agency, LLC did not appear for its deposition or comply with the subpoena. Attached hereto as **Exhibit G** is a true and correct copy of the deposition transcript relating to the deposition of Power Marketing Agency, LLC.

9. Attached hereto as **Exhibit H** is a true and correct copy of the Notice of Intent to Serve Subpoena Duces Tecum to Power Marketing Consultants LLC, that was served December 27, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of the subpoena to Power Marketing Consultants LLC.

11. Attached hereto as **Exhibit J** are true and correct copies of a Declaration and Amended Affidavit of Non-Service outlining the attempts that were made to serve Power Marketing Consultants LLC and showing that it was served via Certified Mail.

12. Attached hereto as **Exhibit K** is a true and correct copy of a screenshot of the Idaho Secretary of State website showing the address for Power Marketing Consultants LLC.

13. Power Marketing Consultants LLC never responded to the subpoena, it never contacted Plaintiffs' counsel regarding the subpoena, and it never filed any motions seeking to quash or modify the subpoena. Accordingly, Plaintiffs' counsel prepared for the deposition,

hired a videographer and a court reporter, and appeared at the deposition on the scheduled date and time. Power Marketing Consultants LLC did not appear for its deposition or comply with the subpoena. Attached hereto as **Exhibit L** is a true and correct copy of the deposition transcript relating to the deposition of Power Marketing Consultants LLC.

14. Attached hereto as **Exhibit M** is a true and correct copy of the Notice of Intent to Serve Subpoena Duces Tecum to Freedom Tabernacle, Incorporated, that was served December 27, 2022.

15. Attached hereto as **Exhibit N** is a true and correct copy of the subpoena to Freedom Tabernacle, Incorporated.

16. Attached hereto as **Exhibit O** are true and correct copies of a Declaration and Affidavit of Non-Service outlining the attempts that were made to serve Freedom Tabernacle, Incorporated and showing that it was served via Certified Mail.

17. Attached hereto as **Exhibit P** is a true and correct copy of a screenshot of the Idaho Secretary of State website showing the address for Freedom Tabernacle, Incorporated.

18. Freedom Tabernacle, Incorporated never responded to the subpoena, it never contacted Plaintiffs' counsel regarding the subpoena, and it never filed any motions seeking to quash or modify the subpoena. Accordingly, Plaintiffs' counsel prepared for the deposition, hired a videographer and a court reporter, and appeared at the deposition on the scheduled date and time. Freedom Tabernacle, Incorporated did not appear for its deposition or comply with the subpoena. Attached hereto as **Exhibit Q** is a true and correct copy of the deposition transcript relating to the deposition of Freedom Tabernacle, Incorporated.

19. Attached hereto as **Exhibit R** is a true and correct copy of a screenshot taken of the People’s Rights Network website showing that Freedom Tabernacle, Incorporated, processes payments on behalf of People’s Rights Network.

20. Attached hereto as **Exhibit S** is a true and correct copy of a screenshot taken of Diego Rodriguez’s personal website, <https://diegorodriguez.org/>, where he promotes himself as the president of the Power Marketing entities.

21. Attached hereto as **Exhibit T** is a true and correct copy of a screenshot of an iCourt filing receipt showing that Diego Rodriguez accessed the notices of intent to serve subpoenas on the Rodriguez Third-Party Entities on December 27, 2022 (for Freedom Tabernacle, Incorporated), and December 28, 2022 (for Power Marketing Agency, LLC, and Power Marketing Consultants LLC).

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

DATED: March 30, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

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

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Dr.
Meridian, ID 83642

- U.S. Certified Mail

Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Certified Mail

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Drive
Meridian, Idaho 83642-9219

- U.S. Certified Mail

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21046243_v1

Exhibit A

March 8, 2023

VIA EMAIL – FREEDOMMANPRESS@PROTONMAIL.COM

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

Re: St. Luke's Health System, Ltd., et al. v. Ammon Bundy, et al. - Case No. CV01-22-06789

Dear Mr. Rodriguez:

We write this email in an attempt to meet and confer pursuant to Idaho Rule of Civil Procedure 37(a)(1) regarding Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated's failure to comply with court-issued subpoenas. You are the agent for these entities, and you control these entities so we hope you will engage with us and stop with the gamesmanship and costly delays. The allegations in this lawsuit make clear the relevance of these entities to my clients' theory of the case.

Attached are subpoenas directed to Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated ("Your Entities"). Because Your Entities do not have current physical addresses on file with the Idaho Secretary of State, we served the subpoenas via Certified Mail on January 4, 2023, and provided you notice through iCourt. As you know, the subpoenas commanded Your Entities to appear at Holland & Hart's Boise office for videotaped depositions on February 3, 2023 (for the Power Marketing entities) and February 6, 2023 (for Freedom Tabernacle), and to produce or permit the inspection of certain documents specified in the subpoenas. None of Your Entities contacted Plaintiffs' counsel regarding the subpoenas or sought a protective order, so we proceeded to acquire needed services for, prepare for, and attend the depositions. Your Entities never appeared.

Further, we intend to ask the Court for our attorney fees and costs for Your Entities' failure to comply with the subpoenas. But in an effort to avoid additional motions, we seek to confer on the issue and set dates to depose Your Entities. Please contact me if you and/or Your Entities are willing to confer on this issue. I ask yet again that you cease with the hiding and, instead, act like a person of integrity and fulfill your obligations under the rules of civil procedure. I must note the hypocrisy. NP Jungman and Dr. Erickson had the courage to care for your grandson while they were being falsely attacked and now have the courage to confront your bullying and false statements in a court of law. In contrast, you falsely targeted people and incited violence for self-promotion and now, rather than confront the litigation like a man of integrity, you run away.

You are also on notice of your duty to maintain relevant correspondence and financial information relating to these entities. If you have spoliated any evidence regarding these entities, we will seek sanctions.

We are noticing a hearing on this dispute for April 18, 2023. If Your Entities are not willing to meet and confer, we will be forced to proceed with a hearing on the matter and will seek additional sanctions and costs.

Very truly yours,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:njh

Enclsoures

21055844_v1

From: Erik Stidham
Sent: Monday, March 20, 2023 12:10 PM
To: Freedom Man Press
Subject: Power Marketing and Freedom Tabernacle

Mr. Rodriguez,

I have not received any response from you regarding my March 8, 2023, meet and confer letter concerning your entities' (Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated) failure to comply with subpoenas. While my client is not waiving any request for fees, I write to ask again for a response?

Sincerely,
Erik

Regards,



**Holland
& Hart**

Erik Stidham

He / Him / His [\(What's this?\)](#)

Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

efstidham@hollandhart.com | **T:** (208) 383-3934 | **M:** (208) 283-8278

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

Exhibit B

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
POWER MARKETING AGENCY, LLC**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

attached hereto as “Exhibit A” on **Power Marketing Agency, LLC**. Plaintiffs intend to serve the Subpoena duces tecum on January 3, 2023 or as soon thereafter as service may be effectuated.

DATED: December 27, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585463_v1

EXHIBIT A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
POWER MARKETING AGENCY, LLC**

STATE OF IDAHO TO: Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ____, 2022.

HOLLAND & HART LLP

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

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of December, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

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

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

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

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

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

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

Diego Rodriguez	<input type="checkbox"/> U.S. Mail
-----------------	------------------------------------

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

20585401_v1

EXHIBIT A

EXHIBIT A

Power Marketing Agency, LLC

DEFINITIONS AND INSTRUCTIONS

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

A. “You,” “your,” or “yours,” shall mean Power Marketing Agency, LLC, 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. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “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.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “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, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

TOPICS AND DOCUMENTS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.

6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit C

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
POWER MARKETING AGENCY, LLC**

STATE OF IDAHO TO: Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: January 3, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People’s Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People’s Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

Tucker & Associates Court Reporting

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

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585401_v1

EXHIBIT A

Power Marketing Agency, LLC

DEFINITIONS AND INSTRUCTIONS

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

A. “You,” “your,” or “yours,” shall mean Power Marketing Agency, LLC, 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. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “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.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “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, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

TOPICS AND DOCUMENTS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.

6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit D

**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., et al. Plaintiff(s): **AFFIDAVIT OF NON-SERVICE**
vs.
Ammon Bundy, et al. Defendant(s): Case Number: CV01-22-06789

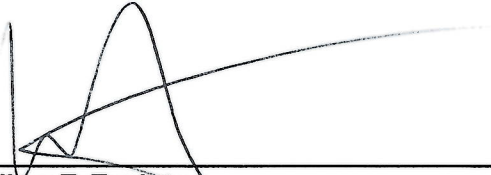
For:
Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

STATE OF IDAHO
COUNTY OF ADA

Received by Tri-County Process Serving LLC on January 3, 2023 to be served on **POWER MARKETING AGENCY LLC**, Attn: Miranda Chavoya, 9169 W. State St., Ste. 3177, Boise, ID 83714.

I hereby certify and return that today, February 3, 2023, I discontinued attempting service of the **Subpoena Duces Tecum**, and after due search and diligent inquiry I was unable to serve said person due to the reasons stated below.


Rush service was attempted upon Miranda Chavoya, Registered Agent for Power Marketing Agency, LLC, at the address provided of 9169 W. State St., Ste. 3177, Boise, ID 83714 on 01/03/2023 at 3:19pm. This a virtual office. The front desk clerk indicated that Miranda is not at this place and only comes in to pick up mail. Service was additionally attempted at 1876 E. Adelaide Dr., Meridian, ID 83642 on 01/04/2023 at 10:58am. The server did not receive a response at the door. Service was again attempted at 1876 E. Adelaide Dr., Meridian, ID 83642 on 01/05/2023 at 10:46am. The current occupant stated this is the Brown residence since last April, and Miranda is unknown to them. Cancel service attempts per Claudia Carvalho on 01/26/2023 at 12:02pm.



William T. Teninty

TRI-COUNTY PROCESS SERVING LLC
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132

Subscribed and sworn before me today, Monday,
February 6, 2023



Notary Public for the State of Idaho

Our Reference Number: 200109 Client Reference:
Erik F. Stidham



**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., et al.

Plaintiff(s):

Declaration

vs.

Ammon Bundy, et al.

Defendant(s):

Case Number: CV01-22-06789

For:

Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

Received by Tri-County Process Serving LLC on January 3, 2023 to be served on **Miranda Chavoya**, 9169 W. State St. Ste 3177, Boise, ID 83714.


I hereby certify and return that today, January 4, 2023, I discontinued attempting service of the **Subpoena Duces Tecum**, and after due search and diligent inquiry I was unable to serve said person due to the reasons stated below.

On 1/4/23 I mailed, via Certified Mail, a copy of the Subpoena Ducus Tecum of Power Marketing Agency, LLC to Miranda Chavoya at 9169 W. State St. Ste 3177, Boise, ID 83714.

TRI-COUNTY PROCESS SERVING LLC

P.O. Box 1224
Boise, ID, 83701
(208) 344-4132

Our Reference Number: 200113
Client Reference: Erik F. Stidham



Carmen Casiano

CERTIFIED MAIL RECEIPT

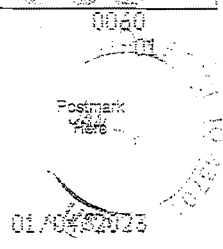
Domestic Mail Only

For delivery information, visit our website at www.usps.com

Garden City, ID 83714

7022 2410 0002 8096 2171

Certified Mail Fee	\$4.00
Extra Services & Fees (check box, add fee as appropriate)	\$3.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$2.80
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.44
Total Postage and Fees	\$8.69

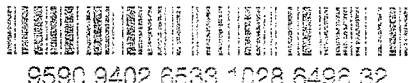


Sent To: **Miranda Chavoya**
 Street, Apt. No., or P.O. Box No.: **9169 W State St, Ste. 3177**
 City, State, ZIP+4®: **Boise ID 83714 #20013**

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Miranda Chavoya
9169 W State St, Ste. 3177
Boise, ID 83714



9590 9402 6533 1028 6498 32

2. Article Number (transfer from service label)

7022 2410 0002 8096 2171

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee

B. Received by (Printed Name) **James** C. Date of Delivery

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

DECLARATON OF SERVICE

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

Exhibit E



- Home
- Search
- Forms
- Lists
- Help

Business Search

Power Marketing Agency, LLC

Advanced ▾

Results: 1

Form Info	Status	Filing Date	Agent
Power Marketing Agency, LLC (4508401) <small>Limited Liability Company (D)</small>	Active-Existing	11/30/2021	Miranda Chavoya

Power Marketing Agency, LLC (4508401)

Limited Liability Company (D)



<i>Filing Type</i>	Limited Liability Company (D)
<i>Status</i>	Active-Existing
<i>Formed In</i>	IDAHO
<i>Term of Duration</i>	Perpetual
<i>Principal Address</i>	SUITE 3177 9169 W STATE ST BOISE, ID 83714
<i>Mailing Address</i>	9169 W STATE ST PMB 3177 BOISE, ID 83714-1733
<i>Initial Filing Date</i>	11/30/2021
<i>AR Due Date</i>	11/30/2023
<i>Registered Agent</i>	Noncommercial 0236337 Miranda Chavoya 9169 W STATE ST SUITE 3177 BOISE, ID 83714



View History

Exhibit F



0004557012



STATE OF IDAHO
 Office of the secretary of state, Lawrence Denney
ANNUAL REPORT
 Idaho Secretary of State
 PO Box 83720
 Boise, ID 83720-0080
 (208) 334-2301
 Filing Fee: \$0.00

For Office Use Only
-FILED-
 File #: 0004557012
 Date Filed: 1/6/2022 1:35:22 PM

Entity Name and Mailing Address:

Entity Name: POWER MARKETING CONSULTANTS LLC

The file number of this entity on the records of the Idaho Secretary of State is: 0000370757

Address: DIEGO RODRIGUEZ
 1876 E ADELAIDE DR
 MERIDIAN, ID 83642-9219

Entity Details:

Entity Status: Active-Existing

This entity is organized under the laws of: IDAHO

If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: W120780

The registered agent on record is:

Registered Agent: DIEGO RODRIGUEZ
 Registered Agent
 Physical Address
 1876 E ADELAIDE
 MERIDIAN, ID 83642
 Mailing Address
 1876 E ADELAIDE DR
 DIEGO RODRIGUEZ
 MERIDIAN, ID 83642-9219

Agent or Address Change

Select if you are appointing a new agent.

Limited Liability Company Managers and Members

Name	Title	Business Address
Diego Rodriguez	Manager	1876 E ADELAIDE MERIDIAN, ID 83642

The annual report must be signed by an authorized signer of the entity.

Job Title: President

Diego Rodriguez 01/06/2022
 Sign Here Date

B0674-1859 01/06/2022 1:35 PM Received by ID Secretary of State Lawrence Denney



0004560851



STATE OF IDAHO
 Office of the secretary of state, Lawrence Denney
ANNUAL REPORT
 Idaho Secretary of State
 PO Box 83720
 Boise, ID 83720-0080
 (208) 334-2301
 Filing Fee: \$0.00

For Office Use Only
-FILED-
 File #: 0004560851
 Date Filed: 1/10/2022 5:47:30 PM

Entity Name and Mailing Address:

Entity Name: FREEDOM TABERNACLE, INCORPORATED

The file number of this entity on the records of the Idaho Secretary of State is: 0000573716

Address: 1876 E ADELAIDE DR
 MERIDIAN, ID 83642-9219

Entity Details:

Entity Status: Active-Good Standing

This entity is organized under the laws of: IDAHO

If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: C189972

The registered agent on record is:

Registered Agent: DIEGO RODRIGUEZ
 Registered Agent
 Physical Address
 1876 E ADELAIDE
 MERIDIAN, ID 83642
 Mailing Address
 1876 E ADELAIDE DR
 DIEGO RODRIGUEZ
 MERIDIAN, ID 83642-9219

Agent or Address Change

Select if you are appointing a new agent.

Corporate Officers and Directors:

Name	Title	Business Address
Diego Rodriguez	President	1876 E ADELAIDE MERIDIAN, ID 83642

The annual report must be signed by an authorized signer of the entity.

Job Title: President

Diego Rodriguez _____ 01/10/2022
 Sign Here Date

B0675-2179 01/10/2022 5:47 PM Received by ID Secretary of State Lawrence Denney

Exhibit G

ST. LUKE'S

vs

AMMON BUNDY

POWER MARKETING AGENCY 30(B)(6)

February 03, 2023



TUCKER&ASSOCIATES

PO Box 44385, Boise, ID 83711

208.345.3704

www.etucker.net

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

-----x Case No. CV01-22-06789
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.

VIDEOTAPED STATEMENT OF NONAPPEARANCE OF POWER MARKETING AGENCY, LLC

February 3, 2023

VOLUME 1
Pages 1 - 7

Reported by:
Brooke R. Bohr
IDAHO CSR No. 753
Federal Certified Realtime Reporter
NCRA Registered Professional Reporter

E X H I B I T S

Page:
1
2
3 1 Notice of Taking Deposition 5
4 2 Photograph 5
5
6

* * * * *

A P P E A R A N C E S

FOR PLAINTIFFS

Erik F. Stidham, Esq.
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: Efstidham@hollandhart.com

ALSO PRESENT: David Cromwell, Videographer

* * * * *

1 BOISE, IDAHO
2 February 3, 2023, 9:38 a.m.
3
4 THE VIDEOGRAPHER: We are now on the record.
5 My name is David Cromwell, representing
6 Tucker & Associates. The date today is
7 February 3rd, 2023, and the time is approximately
8 9:38 a.m.
9 This deposition is being held at
10 Holland & Hart, located at 800 West Main Street,
11 Suite 1750, Boise, Idaho 83702.
12 The caption of this case is
13 St. Luke's Health System v. Ammon Bundy, Case No.
14 CV01-22-06789. The case is filed in the Fourth
15 Judicial District, State of Idaho, County of Ada.
16 The name of the witness is Power Marketing Agency,
17 LLC.
18 The attorneys in the room will identify
19 themselves and the parties they represent.
20 MR. STIDHAM: Erik Stidham of Holland & Hart
21 on behalf of the plaintiffs.
22 THE VIDEOGRAPHER: We can proceed.
23 MR. STIDHAM: So this is Erik Stidham
24 going on the record in order to make a record
25 that Power Marketing, which to our understanding

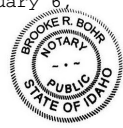
Page 5

1 is wholly owned and was founded by Mr. Diego
 2 Rodriguez, has failed to appear at the
 3 duly appointed time for their deposition.
 4 Mr. Rodriguez, even though he is a party in the
 5 case, has been refusing to communicate.
 6 This is an essential deposition
 7 to the case. Mr. Rodriguez's refusal to
 8 communicate has caused the plaintiffs to incur
 9 costs relating to setting up the court reporter
 10 and the videographer for this. We've incurred
 11 costs related to preparing for this deposition.
 12 And it is extremely frustrating that
 13 Mr. Rodriguez and Power Marketing refuse to
 14 show up. Although, he continues to post
 15 defamatory lies on the internet. We would
 16 encourage Mr. Rodriguez to stop being so
 17 cowardly and start showing up for depositions
 18 and participating in this litigation.
 19 I would like to mark as Exhibit 1 to
 20 this deposition the Notice of Deposition relating
 21 to Power Marketing Agency.
 22 That's all. Off the record.
 23 (Exhibit 1 and 2 marked.)
 24 THE VIDEOGRAPHER: The time is 9:40 a.m.
 25 Off the record.

Page 6

1 (End of Statement.)
 2 * * * * *
 3
 4
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 7

1 R E P O R T E R ' S C E R T I F I C A T E
 2
 3
 4 I, Brooke R. Bohr, a Notary Public in
 5 and for the State of Idaho, do hereby certify:
 6 That on February 3, 2023, I took in
 7 shorthand the said statement of nonappearance and
 8 thereafter it was reduced to typewriting under my
 9 direction, and that the foregoing transcript
 10 contains a full, true, and verbatim record of said
 11 statement.
 12 I further certify that I have no
 13 interest in the event of the action.
 14 WITNESS my hand and seal February 6
 15 2023.
 16 
 17 
 18
 19 NOTARY PUBLIC in and for the State of Idaho;
 20 residing at Boise, Idaho.
 21
 22 My commission expires October 23, 2025
 23 CSR No. 753
 24
 25

Exhibits	Agency 4:16 5:21	David 4:5	Holland 4:10,20	O	S
EXH 1 Power Marketing Agency 020323 5:19,23	Ammon 4:13	defamatory 5:15	I	order 4:24	setting 5:9
EXH 2 Power Marketing Agency 020323	appointed 5:3	deposition 4:9 5:3,6,11,20	Idaho 4:1,11,15	owned 5:1	show 5:14
1	approximatel y 4:7	depositions 5:17	identify 4:18	P	showing 5:17
1 5:19,23	Associates 4:6	Diego 5:1	incur 5:8	participating 5:18	St 4:13
1750 4:11	attorneys 4:18	District 4:15	incurred 5:10	parties 4:19	start 5:17
2	B	duly 5:3	internet 5:15	party 5:4	State 4:15
2 5:23	behalf 4:21	E	J	plaintiffs 4:21 5:8	Statement 6:1
2023 4:2,7	Boise 4:1,11	encourage 5:16	Judicial 4:15	post 5:14	Stidham 4:20,23
3	Bundy 4:13	end 6:1	L	Power 4:16,25 5:13,21	stop 5:16
3 4:2	C	Erik 4:20,23	lies 5:15	preparing 5:11	Street 4:10
3rd 4:7	caption 4:12	essential 5:6	litigation 5:18	proceed 4:22	Suite 4:11
8	case 4:12,13,14 5:5,7	exhibit 5:19,23	LLC 4:17	R	System 4:13
800 4:10	caused 5:8	extremely 5:12	located 4:10	record 4:4,24 5:22,25	T
83702 4:11	communicate 5:5,8	F	Luke's 4:13	refusal 5:7	time 4:7 5:3,24
9	continues 5:14	failed 5:2	M	refuse 5:13	today 4:6
9:38 4:2,8	costs 5:9,11	February 4:2,7	Main 4:10	refusing 5:5	Tucker 4:6
9:40 5:24	County 4:15	filed 4:14	make 4:24	related 5:11	U
A	court 5:9	founded 5:1	mark 5:19	relating 5:9,20	understandin g 4:25
a.m. 4:2,8 5:24	court 5:9	Fourth 4:14	marked 5:23	reporter 5:9	W
Ada 4:15	cowardly 5:17	frustrating 5:12	Marketing 4:16,25 5:13,21	represent 4:19	West 4:10
A	D	H	N	representing 4:5	wholly 5:1
a.m. 4:2,8 5:24	date 4:6	Hart 4:10,20	Notice 5:20	Rodriguez 5:2,4,13,16	
Ada 4:15		Health 4:13		Rodriguez's 5:7	
		held 4:9		room 4:18	

Exhibit H

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
POWER MARKETING CONSULTANTS
LLC**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

attached hereto as “Exhibit A” on **Power Marketing Consultants LLC**. Plaintiffs intend to serve the Subpoena duces tecum on January 3, 2023, or as soon thereafter as service may be effectuated.

DATED: December 27, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

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

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

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

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

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

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

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585991_v1

EXHIBIT A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
POWER MARKETING CONSULTANTS
LLC**

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Dr.
Meridian, ID 83642

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 1:30 p.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 1:30 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ____, 2022.

HOLLAND & HART LLP

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

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of December, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

Diego Rodriguez

U.S. Mail

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/

Erik F. Stidham
OF HOLLAND & HART LLP

20586009_v1

EXHIBIT A

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

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

A. “You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, 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. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “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.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “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, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

20587607_v1

Exhibit I

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

<p>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,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p style="text-align: center;">SUBPOENA DUCES TECUM OF POWER MARKETING CONSULTANTS LLC</p>
---	---

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Dr.
Meridian, ID 83642

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 1:30 p.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 1:30 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: January 3, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

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

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

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

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

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

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

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

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

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20586009_v1

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

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

A. “You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, 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. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “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.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “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, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

20587607_v1

Exhibit J

**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., et al.

Plaintiff(s):

**AMENDED AFFIDAVIT OF
NON-SERVICE**

vs.

Ammon Bundy, et al.

Defendant(s):

Case Number: CV01-22-06789

For:

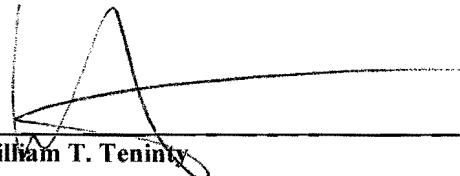
Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

STATE OF IDAHO)
 :ss
COUNTY OF ADA)

Received by Tri-County Process Serving LLC on January 3, 2023 to be served on **POWER MARKETING CONSULTANTS LLC,**

I hereby certify and return that today, February 3, 2023, I discontinued attempting service of the **Subpoena Duces Tecum,** and after due search and diligent inquiry I was unable to serve said person due to the reasons stated below.


Rush service was attempted upon Diego Rodriguez, Registered Agent for Power Marketing Consultants, LLC, at the address provided of 9169 W. State St., Ste. 3177, Boise, ID 83714 on 01/03/2023 at 3:19pm. This a virtual office. The front desk clerk indicated that Diego is not at this place. Service was additionally attempted at 1876 E. Adelaide Dr., Meridian, ID 83642 on 01/04/2023 at 10:58am. The server did not receive a response at the door. Service was again attempted at 1876 E. Adelaide Dr., Meridian, ID 83642 on 01/05/2023 at 10:46am. The current occupant stated this is the Brown residence since last April, and Diego is unknown to them. Cancel service attempts per Claudia Carvalho on 01/26/2023 at 12:02pm.



William T. Teninty

TRI-COUNTY PROCESS SERVING LLC
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132

Subscribed and sworn before me today, Thursday,
February 16, 2023



Notary Public for the State of Idaho

Our Reference Number: 200108 Client Reference:
Erik F. Stidham

JENNA BALVIN
COMMISSION #20202414
NOTARY PUBLIC
STATE OF IDAHO
MY COMMISSION EXPIRES 08/26/2026

**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., et al.

Plaintiff(s):

Declaration

vs.

Ammon Bundy, et al.

Defendant(s):

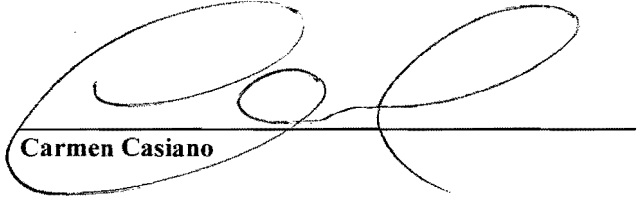
Case Number: CV01-22-06789

For:
Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

Received by Tri-County Process Serving LLC on January 3, 2023 to be served on **POWER MARKETING CONSULTANTS LLC**, Attn: Miranda Chavoya, 9169 W. State St., Ste. 3177, Boise, ID 83714.

On 1/4/23 I mailed, via Certified Mail, a copy of the Subpoena Ducus Tecum of Power Marketing Agency, LLC to Power Marketing Consultants LLC Attn: Miranda Chavoya at 9169 W. State St., Ste. 3177, Boise, ID 83714.

TRI-COUNTY PROCESS SERVING LLC
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132


Carmen Casiano

Our Reference Number: 200112 Client Reference: Erik
F. Stidham

7022 2410 0002 8096 2102

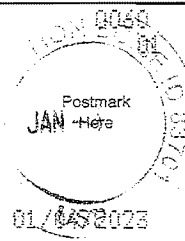
CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee	\$4.00
Extra Services & Fees (check box, add fees as appropriate)	\$7.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.68
Total Postage and Fees	\$8.93



Send to
Power Marketing Consultants LLC
 Street and Apt. No., or PO Box No.
9169 W. State St., Ste. 3177
 City, State, ZIP+4®
Boise ID 83714 #200112

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Power Marketing Consultants LLC
Attn: Miranda Chavoya
9169 W. State St., Ste. 3177
Boise, ID 83714

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Agent
 Addressee

B. Received by (Printed Name)
Jamie B.

C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No



2. Article Number (Transfer from service label)
7022 2410 0002 8096 2102

3. Service Type
 Adult Signature
 Adult Signature Restricted Delivery
 Certified Mail®
 Certified Mail Restricted Delivery
 Collect on Delivery
 Collect on Delivery Restricted Delivery
 Priority Mail Express®
 Registered Mail™
 Registered Mail Restricted Delivery
 Signature Confirmation™
 Signature Confirmation Restricted Delivery

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

DECLARATON OF SERVICE

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

Exhibit K

Search | Idaho Secretary of State x +

sosbiz.idaho.gov/search/business

IDAHO Secretary of State's Office

Business Notary Liens Trademark Franchise Authority

Home

Search

Forms

Lists

Help

Business Search

Power Marketing Consultants, LLC

Advanced

Results: 1

Form Info	Status	Filing Date	Agent
POWER MARKETING CONSULTANTS LLC (370757) <i>Limited Liability Company (D)</i>	Active-Existing	01/09/2013	DIEGO RODRIGUEZ

Request Certificate

Filing Type: Limited Liability Company (D)

Status: Active-Existing

Formed In: IDAHO

Term of Duration: Perpetual

Principal Address: 1883 N WILDWOOD ST
BOISE, ID 83713

Mailing Address: DIEGO RODRIGUEZ
1876 E ADELAIDE DR
MERIDIAN, ID 83642-9219

Initial Filing Date: 01/09/2013

AR Due Date: 01/31/2023

Registered Agent: Noncommercial
0081186
DIEGO RODRIGUEZ
1876 E ADELAIDE
MERIDIAN, ID 83642

View History

© 2023 ID Secretary of State

Exhibit L

ST. LUKE'S

vs

AMMON BUNDY

POWER MARKETING CONSULTANTS 30(B)(6)

February 03, 2023



TUCKER&ASSOCIATES

PO Box 44385, Boise, ID 83711

208.345.3704

www.etucker.net

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

-----x Case No. CV01-22-06789

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. :

-----x

VIDEOTAPED STATEMENT OF NONAPPEARANCE OF POWER MARKETING CONSULTANTS LLC

February 3, 2023

VOLUME 1
Pages 1 - 6

Reported by:
Brooke R. Bohr
IDAHO CSR No. 753
Federal Certified Realtime Reporter
NCRA Registered Professional Reporter

E X H I B I T S

Page:
1
2
3 1 Notice of Taking Deposition 4
4 2 Photograph 4
5
6

* * * * *

A P P E A R A N C E S

FOR PLAINTIFFS

Erik F. Stidham, Esq.
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: Efstidham@hollandhart.com

ALSO PRESENT: David Cromwell, Videographer

* * * * *

1 BOISE, IDAHO
2 February 3, 2023, 1:39 p.m.

3
4 THE VIDEOGRAPHER: We are now on the record.
5 My name is David Cromwell, representing
6 Tucker & Associates. The date today is
7 February 3rd, 2023, and the time is approximately
8 1:39 p.m.

9 This deposition is being held at
10 Holland & Hart, located at 800 West Main Street,
11 Suite 1750, Boise, Idaho 83702.

12 The caption of this case is St.
13 Luke's Health System v. Ammon Bundy, Case No.
14 CV01-22-06789. The case is filed in the Fourth
15 Judicial District, State of Idaho, County of Ada.
16 The name of the witness is Power Marketing
17 Consultants LLC.

18 The attorneys in the room will identify
19 themselves and the parties they represent.
20 MR. STIDHAM: Erik Stidham of Holland & Hart
21 on behalf of the plaintiffs.

22 THE VIDEOGRAPHER: We can now proceed.

23
24 STATEMENT OF NONAPPEARANCE
25 MR. STIDHAM: Power marketing consultants

1 has failed to appear. It is now the time for the
2 deposition and subpoena duces tecum that has been
3 properly noticed.

4 I would also note that Mr. Diego
5 Rodriguez, who is a defendant in this case, is
6 identified as a registered agent for Marketing
7 Consultants. And Mr. Rodriguez is also, as I
8 mentioned, a defendant in this case, and the
9 founder and, based on the information we have,
10 president or CEO of Power Marketing.

11 The failure to appear has caused us
12 to incur attorneys' fees related to the
13 preparation of this litigation. It has also
14 caused the plaintiffs to incur costs relating to
15 court reporter and videographer services.

16 I have marked as Exhibit 1 to this
17 deposition the subpoena duces tecum to Power
18 Marketing Consultants LLC.

19 We can now go off the record.

20 (Exhibits 1 and 2 marked.)

21 THE VIDEOGRAPHER: The time is 1:41 p.m.
22 Off the record.

23 (End of Statement.)

24 * * * * *

25

1 R E P O R T E R ' S C E R T I F I C A T E

2

3

4 I, Brooke R. Bohr, a Notary Public in
5 and for the State of Idaho, do hereby certify:

6 That on February 3, 2023, I took in
7 shorthand the said statement of nonappearance and
8 thereafter it was reduced to typewriting under my
9 direction, and that the foregoing transcript
10 contains a full, true, and verbatim record of said
11 statement.

12 I further certify that I have no
13 interest in the event of the action.

14 WITNESS my hand and seal February 6,
15 2023.

16

17

18

19



20 NOTARY PUBLIC in and for the State of Idaho;
21 residing at Boise, Idaho.

22

23

24

25

My commission expires October 23, 2025
CSR No. 753

Exhibits	Ammon	defendant	I	P	Street
EXH 1 Power Marketing Co nsultants 020 323	4:13 approximatel y	5:5,8 deposition	Idaho	p.m.	4:10
EXH 2 People ' s Rights Con sultants 0202 23	4:7 Associates	4:9 5:2,17 Diego	4:1,11,15 identified	4:2,8 5:21 parties	5:2,17 Suite
1	4:6 attorneys	5:4 District	5:6 identify	4:19 plaintiffs	4:11 System
1	4:18 attorneys'	4:15 duces	4:18 incur	4:21 5:14 Power	4:13 T
1750	5:12 based	5:2,17 end	5:12,14 information	4:16,25 5:10,17 preparation	tecum
1:39	B	5:23 Erik	J	5:13 president	5:2,17
1:41	5:9 behalf	4:20 Exhibit	Judicial	5:10 proceed	time
2	4:21 Boise	5:16 exhibits	L	4:22 properly	4:7 5:1,21
2	4:1,11 Bundy	5:20 failed	litigation	5:3 record	today
2023	C	5:1 failure	LLC	4:4 5:19,22 registered	4:6
3	4:12 caption	5:11 February	located	5:6 related	Tucker
3	4:12,13,14 5:5,8 case	4:2,7 fees	Luke's	5:12 reporter	4:6
3rd	5:11,14 caused	5:12 filed	M	5:15 represent	4:6
8	5:10 CEO	4:14 founder	Main	4:19 representing	West
800	4:17,25 5:7,18 consultants	5:9 Fourth	marked	4:5 Rodriguez	4:10
83702	5:14 costs	4:14 H	marketing	5:7 room	4:6
A	4:15 County	5:8 mentioned	mentioned	4:18 S	4:6
Ada	5:15 court	4:10,20 Hart	N	5:15 services	4:6
agent	4:5 Cromwell	4:13 Health	NONAPPEAR ANCE	4:12 St	4:6
D	4:14 CV01-22-06789	4:9 held	note	4:15 State	4:6
date	4:14 D	4:10,20 Holland	noticed	4:24 5:23 Statement	4:6
David	4:5 date	4:5 held	5:3 noticed	4:20,25 Stidham	4:6

Exhibit M

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
FREEDOM TABERNACLE,
INCORPORATED**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO FREEDOM
TABERNACLE, INCORPORATED - 1**

attached hereto as “Exhibit A” on **Freedom Tabernacle, Incorporated**. Plaintiffs intend to serve the Subpoena duces tecum on January 3, 2023 or as soon thereafter as service may be effectuated.

DATED: December 27, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585449_v1

EXHIBIT A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
FREEDOM TABERNACLE,
INCORPORATED**

STATE OF IDAHO TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Drive
Meridian, Idaho 83642-9219

**SUBPOENA DUCES TECUM OF FREEDOM TABERNACLE,
INCORPORATED - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 6, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 6, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

[SEE ATTACHMENT A]

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ___, 2022.

HOLLAND & HART LLP

Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of December, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People’s Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People’s Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

Diego Rodriguez

- U.S. Mail

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

Erik F. Stidham
OF HOLLAND & HART LLP

20585328_v1

EXHIBIT A

EXHIBIT A

Freedom Tabernacle Incorporated

DEFINITIONS AND INSTRUCTIONS

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

A. “You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, 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. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “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.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “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, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

20587606_v1

Exhibit N

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
FREEDOM TABERNACLE,
INCORPORATED**

STATE OF IDAHO TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Drive
Meridian, Idaho 83642-9219

**SUBPOENA DUCES TECUM OF FREEDOM TABERNACLE,
INCORPORATED - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 6, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 6, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

[SEE ATTACHMENT A]

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: January 3, 2023

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People’s Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People’s Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

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

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585328_v1

EXHIBIT A

Freedom Tabernacle Incorporated

DEFINITIONS AND INSTRUCTIONS

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

A. “You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, 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. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “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.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “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, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

20587606_v1

Exhibit O

**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., et al.

Plaintiff(s):

AFFIDAVIT OF NON-SERVICE

vs.

Case Number: CV01-22-06789

Ammon Bundy, et al.

Defendant(s):

For:

Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

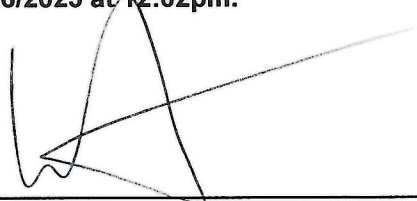
STATE OF IDAHO

COUNTY OF ADA

Received by Tri-County Process Serving LLC on January 3, 2023 to be served on **FREEDOM TABERNACLE, INCORPORATED**, Attn: Diego Rodriguez, Registered Agent, 1876 E. Adalaide Dr., Meridian, ID 83642.

I hereby certify and return that today, February 3, 2023, I discontinued attempting service of the **Subpoena Duces Tecum**, and after due search and diligent inquiry I was unable to serve said person due to the reasons stated below.

Rush service was attempted upon Diego Rodriguez, Registered Agent for Freedom Tabernacle, Incorporated, at the address provided of 9169 W. State St., Ste. 3177, Boise, ID 83714 on 01/03/2023 at 3:19pm. This a virtual office. The front desk clerk indicated that Diego is not at this place. Service was additionally attempted at 1876 E. Adelaide Dr., Meridian, ID 83642 on 01/04/2023 at 10:58am. The server did not receive a response at the door. Service was again attempted at 1876 E. Adelaide Dr., Meridian, ID 83642 on 01/05/2023 at 10:46am. The current occupant stated this is the Brown residence since last April, and Diego is unknown to them. Cancel service attempts per Claudia Carvalho on 01/26/2023 at 12:02pm.

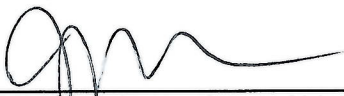


William T. Teninty

TRI-COUNTY PROCESS SERVING LLC

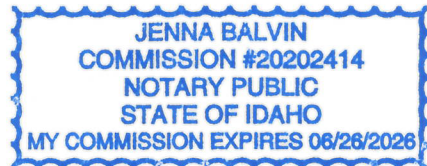
P.O. Box 1224
Boise, ID, 83701
(208) 344-4132

Subscribed and sworn before me today, Friday,
February 3, 2023



Notary Public for the State of Idaho

Our Reference Number: 200107 Client Reference:
Erik F. Stidham



**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., et al.

Plaintiff(s):

Declaration

vs.

Ammon Bundy, et al.

Defendant(s):

Case Number: CV01-22-06789

For:

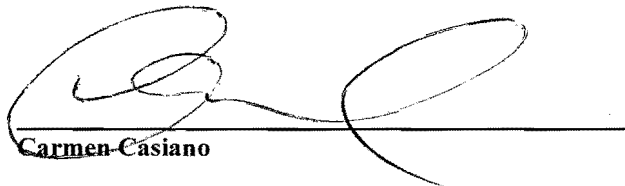
Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

Received by Tri-County Process Serving LLC on January 3, 2023 to be served on **FREEDOM TABERNACLE, INCORPORATED**, Attn: Diego Rodriguez, Registered Agent, 1876 E. Adalaide Dr., Meridian, ID 83642.

On 1/4/23 I mailed, via Certified Mail, a copy of the Subpoena Ducus Tecum of Freedom Tabernacle, Incorporated to Freedom Tabernacle, Incorporated, Attn: Diego Rodriguez at 1876 E. Adelaide Dr., Meridian, ID 83642.

TRI-COUNTY PROCESS SERVING LLC

P.O. Box 1224
Boise, ID, 83701
(208) 344-4132



Carmen Casiano

Our Reference Number: 200110 Client Reference: Erik
F. Stidham

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at www.usps.com

REGISTRATION NO. 83684
OFFICIAL USE

Certified Mail Fee \$4.00

\$ 3.25

Extra Services & Fees (check box, add fee as appropriate)

Return Receipt (hardcopy) \$ 0.00

Return Receipt (electronic) \$ 0.00

Certified Mail Restricted Delivery \$ 0.00

Adult Signature Required \$ 0.00

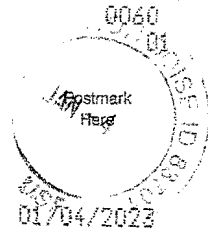
Adult Signature Restricted Delivery \$ 0.00

Postage \$0.84

\$

Total Postage and Fees \$5.09

\$



Sent To
Freedom Tobacco Incorporated
Street and Apt. No., or PO Box No.
1876 E Adelaide Dr.
City, State, ZIP+4®
Meridian ID 83642 #200110

PS Form 3800, April 2013 PSN 7530-02-000-9047 See Reverse for Instructions

7032 2410 0002 8096 2133
EFT2 9608 2000
01/04/2023

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

DECLARATON OF SERVICE

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

Exhibit P



Home

Search

Forms

Lists

Help

Business Search

Freedom Tabernacle, Incorporated



Advanced

Results: 1

Form Info	Status	Filing Date	Agent
FREEDOM TABERNALE, INCORPORATED (573716) <i>Non-Profit Corporation (D)</i>	Active-Good Standing	02/04/2011	DIEGO RODRIGUEZ

FREEDOM TABERNALE, INCORPORATED (573716)

Non-Profit Corporation (D)



Request Certificate

<i>Filing Type</i>	Non-Profit Corporation (D)
<i>Status</i>	Active-Good Standing
<i>Formed In</i>	IDAHO
<i>Term of Duration</i>	Perpetual
<i>Principal Address</i>	N/A
<i>Mailing Address</i>	1876 E ADELAIDE DR MERIDIAN, ID 83642-9219
<i>Initial Filing Date</i>	02/04/2011
<i>AR Due Date</i>	02/28/2023
<i>Registered Agent</i>	Noncommercial 0051196 DIEGO RODRIGUEZ 1876 E ADELAIDE MERIDIAN, ID 83642



View History

Exhibit Q

ST. LUKE'S

vs

AMMON BUNDY

FREEDOM TABERNACLE

February 06, 2023



TUCKER&ASSOCIATES

PO Box 44385, Boise, ID 83711

208.345.3704

www.etucker.net

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

-----x Case No. CV01-22-06789
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.

VIDEOTAPED STATEMENT OF NONAPPEARANCE OF
FREEDOM TABERNACLE, INCORPORATED

February 6, 2023

VOLUME 1
Pages 1 - 6

Reported by:
Brooke R. Bohr
IDAHO CSR No. 753
Federal Certified Realtime Reporter
NCRA Registered Professional Reporter

E X H I B I T S

Page:
1
2
3 1 Notice of Taking Deposition 5
4 2 Photograph 5
5
6

* * * * *

A P P E A R A N C E S

FOR PLAINTIFFS

Erik F. Stidham, Esq.
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: Efstidham@hollandhart.com

ALSO PRESENT: David Cromwell, Videographer

* * * * *

1 BOISE, IDAHO
2 February 6, 2023, 9:51 a.m.

3
4 THE VIDEOGRAPHER: We are now on the record.
5 My name is David Cromwell, representing
6 Tucker & Associates. The date today is
7 February 6, 2023, and the time is approximately
8 9:51 a.m.

9 This deposition is being held at
10 Holland & Hart, located at 800 West Main Street,
11 Suite 1750, Boise, Idaho 83702.

12 The caption of this case is
13 St. Luke's Health System v. Ammon Bundy,
14 Case No. CV01-22-06789. The case is filed in
15 the Fourth Judicial District, State of Idaho,
16 County of Ada. The name of the witness is
17 Freedom Tabernacle, Incorporated.

18 The attorneys in the room will
19 identify themselves and the parties they
20 represent.

21 MR. STIDHAM: Erik Stidham of Holland & Hart
22 here on behalf of the plaintiffs.

23 THE VIDEOGRAPHER: We can now proceed.
24
25

1 STATEMENT OF NONAPPEARANCE
2 MR. STIDHAM: This is Erik Stidham appearing
3 on the record.

4 No one has showed up on behalf of
5 the deponent, Freedom Tabernacle. Now is the
6 time that was properly noticed, not only for
7 the deposition, but also for the production of
8 documents through a subpoena duces tecum.

9 I'll note for the record that
10 Mr. Diego Rodriguez is the founder and owner
11 of Freedom Tabernacle, Incorporated. This
12 reflects yet another instance of Mr. Rodriguez
13 avoiding his obligations pursuant to the Rules of
14 Civil Procedure.

15 I'd like to mark as Exhibit 1 to this
16 deposition the notice and attached subpoena duces
17 tecum relating to this deposition.

18 That's all. We can go off the record.

19 THE VIDEOGRAPHER: The time is 9:53 a.m.
20 Off the record.

21 (Exhibits 1 and 2 marked.)

22 (End of Statement.)

23 * * * * *

24
25

1 R E P O R T E R ' S C E R T I F I C A T E

2
3

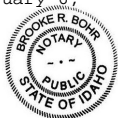
4 I, Brooke R. Bohr, a Notary Public in
5 and for the State of Idaho, do hereby certify:

6 That on February 6, 2023, I took in
7 shorthand the said statement of nonappearance and
8 thereafter it was reduced to typewriting under my
9 direction, and that the foregoing transcript
10 contains a full, true, and verbatim record of said
11 statement.

12 I further certify that I have no
13 interest in the event of the action.

14 WITNESS my hand and seal February 6,
15 2023.

16 



17
18
19

20 NOTARY PUBLIC in and for the State of Idaho;
21 residing at Boise, Idaho.

22 My commission expires October 23, 2025
23 CSR No. 753

24
25

Exhibits	appearing	documents	J	properly	today
EXH 1 Freedom Tabernacle 020623	5:2 approximatel y	5:8 duces 5:8,16	Judicial	5:6 pursuant 5:13	4:6 Tucker 4:6
EXH 2 Freedom Tabernacle 020623	4:7 Associates 4:6	E	L	R	W
1	attached	end	located	record	West
1	5:16 attorneys	5:22 Erik	4:10 Luke's	4:4 5:3,9,18,20 reflects	4:10
5:15,21	4:18 avoiding	4:21 5:2 Exhibit	4:13	5:12 relating	
1750	5:13 B	5:15 exhibits 5:21	M	5:17 represent	
4:11	behalf	F	Main	4:20 representing	
2	4:22 5:4 Boise	February	4:10 mark	4:5 Rodriguez	
2	4:1,11 Bundy	4:2,7 filed	5:15 marked	5:10,12 room	
5:21	4:13 C	4:14 founder	N	4:18 Rules	
2023		5:10 Fourth	NONAPPEAR ANCE	5:13 S	
4:2,7	caption	4:15 Freedom	5:1 note	5:4 showed	
6	4:12 case	4:17 5:5,11 H	5:9 notice	4:13 St	
4:2,7	4:12,14 Civil	4:10,21 Hart	5:16 noticed	4:15 State	
8	5:14 County	4:13 Health	O	4:15 Statement	
800	4:16 Cromwell	4:9 held	5:13 obligations	5:1,22 Stidham	
4:10	4:5 CV01-22- 06789	4:10,21 Holland	5:10 owner	4:21 5:2 Street	
4:11	4:14 D	I	P	4:10 subpoena	
9		4:1,11,15 Idaho	4:19 parties	5:8,16 Suite	
9:51	4:6 date	4:19 identify	4:22 plaintiffs	4:11 System	
4:2,8	4:5 David	4:17 5:11 Incorporated	5:14 Procedure	4:13 T	
9:53	5:5 deponent	5:12 instance	4:23 proceed	4:17 5:5,11 Tabernacle	
A	4:9 5:7,16,17 deposition		4:23 production	5:8,17 tecum	
4:2,8 5:19	5:10 Diego		5:7	4:7 5:6,19 time	
4:16	4:13 District				
Ammon					
4:13					

Exhibit R

Help Out?



Bottom Line: A nation-wide communication network for defending rights is expensive.

No Billionaires Here

Unlike a lot of *other* efforts out there, backed by "Daddy Warbucks", People's Rights stands on its own. But, fortunately, nothing is free, including freedom from oppression by those that wish to do harm. It takes time and effort to defend your rights, or the rights of your neighbors, and occasionally it even takes more than that. This effort is no different. The bare facts: Servers cost money. Development costs money. Sending out mass texts and emails to thousands of recipients on a daily basis costs money. At the moment, that's just the way the world operates, and that's not all bad. To this point we've been able to carry the load, but it's starting to sting a little, and we could use some help.

People's Rights is Now Organized in...

41 STATES

458 AREAS

65,057 PEOPLE

HELP OUT

Honest Transparency

The People's Rights network consists of individuals that simply want to be left alone, to live their lives as they see fit. Our intent is pure, and we desire to be as open and clear as possible about our motives, desires and the operating expenses of the network. For this reason, *almost real-time** statistics are being provided below to frankly show users what the message volume and associated costs are.

Sent	Texts	Emails	Secure
Total	1,888,544	2,163,357	714,387
Last 7 Days	4,988	9,194	2,139
Last 30 Days	24,105	33,141	14,548

Expenses	Last 7 Days	Last 30 Days
Texts	\$90.11	\$520.48
Development	\$0.00	\$0.00
Emails	\$31.75	\$31.75
Hosting	\$0.00	\$68.24
Transaction Fees	\$2.40	\$26.85

Expenses	Last 7 Days	Last 30 Days
Total	\$124.26	\$647.32
Help Received	Last 7 Days	Last 30 Days
Total	\$146.00	\$514.00
Help Needed	Total	
Balance Needed	\$0.00	

GIVE A GIFT

* Important Note: Some of the numbers displayed above are updated nightly, and are quite *conservative*, as they do **not** include *operational* messages, such as those sent out by the system when an individual first joins the network, access codes sent for login authentication, or other system notifications that are not considered a person-to-person interaction.

Recent Help

Below are recent gifts from individuals just like you that are helping to offset the costs involved. If you *are* one of these individuals, *thank you for helping to support the network* and keep this tool available to all that use it across the country in defense of rights! :-)

When	Frequency	Amount
Jan 10, 2023	Monthly	\$2.00
Jan 10, 2023	Monthly	\$5.00
Jan 9, 2023	Monthly	\$10.00
Jan 8, 2023	Monthly	\$3.00
Jan 8, 2023	Monthly	\$5.00
Jan 8, 2023	Monthly	\$5.00
Jan 8, 2023	Monthly	\$1.00
Jan 8, 2023	Monthly	\$2.00
Jan 8, 2023	Monthly	\$10.00
Jan 7, 2023	Monthly	\$2.00

HELP NOW

Are You Willing?

If you're interested in helping us keep the network alive, and the communication flowing for organized areas around the country, please consider making a monthly gift, or even a one-time gift, toward the operating expenses. In the event that your circumstances change, a monthly subscription can be cancelled at any time; no need to contact anyone for assistance. If you feel you can afford help keep things moving, please consider making a gift today.

Online

To support People's Rights and the cause of Freedom using a debit or credit card online, please use the payment form below. The transaction will be processed by *Freedom Tabernacle* through [Anedot](#) - a secure platform for online gift transactions.

Enter Amount to Donate



(Please Note: Your bank statement will show a donation to FREEDOM TABERNACLE.)

Cryptocurrency

If you're into the future, or don't like what the current US monetary system has to offer, please consider making a donation using **Bitcoin** or **Ethereum** cryptocurrencies...



[3Da7VRqfuhBGikssnwbBb34rpjEfwb1GNB](https://bitcoin.org/address/3Da7VRqfuhBGikssnwbBb34rpjEfwb1GNB)



[0x27AF3592C0b1c1e3A7EEFAE6BCb4370a7AcfbB7c](https://etherscan.io/address/0x27AF3592C0b1c1e3A7EEFAE6BCb4370a7AcfbB7c)

Offline

To help in a more traditional fashion, a check or money order made payable to the address below, may be sent via standard US Mail...

DONO CUSTOS

PO Box 370, Emmett, ID 83617, USA

([Dono Custos](#) is an entity created specifically to handle gifts made to worthy efforts like People's Rights.)

Exhibit S



DIEGO
RODRIGUEZ

Featured on



ABOUT DIEGO

Who is Diego Rodriguez?
And how can he help my
business?

[About](#)

FREE RESOURCES

Get FREE Resources for
Business Growth and
Personal Development

PRODUCTS

Marketing, Recruitment,
Video, and Time
Management Products

Meet Diego Rodriguez

Diego Rodriguez is an author, motivational speaker, and entrepreneur. Currently, he is serving as the President of Power Marketing International, which consists of the [Power Marketing Consultants Network](http://www.powermarketing.net)—the largest international network of professional marketing consultants in the world, the [Power Marketing Agency](https://powermarketing.agency)—which is the premier marketing agency for total market domination, and the [Power Marketing Pantheon](https://pantheon.marketing)—the preeminent business network and training source for business growth and development.



"Diego doesn't just teach people how to think differently and overcome limiting beliefs. He's done it himself and he continues to do so. His enthusiasm is infectious. I'd encourage anyone and everyone to take advantage of his business systems and concepts." - [Robert Allen](http://www.robertallen.com/), **New York Times Best Selling Author**



"Diego is the most talented local marketer I've ever met. If I got hit by a bus...Diego is the guy I'd choose to take my place. And if my son wanted to become a consultant and I wasn't around to teach him...I would want Diego to be the person to give him guidance." - [Frank Kern](http://www.frankkern.com/), **Legendary Online Marketer**



"Diego is not only a personal friend and confidante, but he is one of the most brilliant marketers I've ever met. His successes speak for themselves and his systems are the best you'll find anywhere." - [Mike Koenigs](http://www.mikekoenigs.com/), **Traffic Geyser**



"Diego is one of the most brilliant marketing minds anywhere. He simply knows what works and he gets it done. He's helped our company greatly and I'd encourage anybody who gets the chance to work with him to do so!" - [Eric Lofholm](https://saleschampion.com/), **Sales Trainer for Tony Robbins**

Diego is a highly sought after business growth consultant and was trained by [Jay Abraham](http://www.abraham.com/). He is the Senior Consultant and training director for the Power Marketing Pantheon. He was also the primary trainer in Mike Koenig's Instant Customer Revolution program and he has trained over 8,000 entrepreneurs in over 40 countries.

He was the creator of the HVAC Mastery Program (for Contractors), the PI Mastery Program (for Personal Injury Attorneys), and the Dental Mastery Program (for Dentists). He was also the creator of the marketing and business development program for [Drone Command Live](http://www.dronecommandlive.com) and the [Sky Eye Network](http://www.skyeyenetwork.com) (for Drone operators).

Diego's *Power Marketing Program* has a 100% success record of growing any business in any industry and of any size. He has consulted businesses using the *Power Marketing Program* in dozens of industries across the world.

Diego also serves as the Communications Director for the [Freedom Man PAC](https://www.freedomman.org), and commonly writes articles about freedom liberty, the Constitution, and the founding principles of America under the pseudonym, Gunner Steele.



[\(https://diegocast.com/\)](https://diegocast.com/)

Sign Up for the NEXT DIEGOCAST! (<https://diegocast.com/>)



[\(https://powermarketing.net/\)](https://powermarketing.net/)

Visit Power Marketing (<https://powermarketing.net/>)

POPULAR LINKS:


- [About Diego \(about/\)](#)
- [Free Resources \(resources/\)](#)
- [Products \(products/\)](#)
- [Power Marketing \(https://powermarketing.net\)](#)


• [Contact Diego](#) • ([contact/](#))


CONTACT:
 1317 Edgewater Dr. Suite 5077
 Orlando, FL 32804
 (321) 977-1444


SITE INFORMATION:
[Privacy Policy \(privacy/\)](#)
[Terms and Conditions \(terms-and-conditions/\)](#)
[Site Map \(sitemap/\)](#)

SOCIAL MEDIA LINKS:

 (<http://www.facebook.com/PowerMarketingCon>)

 (<https://twitter.com/#!/PwrMktgCnsitnts>)

 (<http://www.linkedin.com/company/power-marketing-consultants>)

 (#)

© 2011-2023 Diego Rodriguez | Orlando, FL

Exhibit T

Case # CV01-22-06789 - St Lukes Health System LTD, St Lukes Reg

Envelope Information

Envelope Id 5678712	Submitted Date 12/27/2022 3:30 PM MST	Submitted User Name efstidham@hollandhart.com
-------------------------------	---	---

Case Information

Location Ada County District Court	Category Civil	Case Type AA - All Initial District Court Filings (Not Listed In: E, F, and H1)
--	--------------------------	---

Case Initiation Date 5/11/2022	Case # CV01-22-06789
--	--------------------------------

Assigned to Judge
Norton, Lynn G.

Filings

Filing Type EFileAndServe	Filing Code Notice
-------------------------------------	------------------------------

Filing Description
of Intent to Serve Subpoena Duces Tecum to Aaron Welling

Filing Status Accepted	Accepted Date 12/28/2022 3:40 PM MST
----------------------------------	--

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena - Aaron Welling.pdf	Notice of Intent to Serve Subpoena Duces Tecum to Aaron Welling	Public	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Diego Rodriguez	Individual	Yes	12/28/2022 4:31 PM MST
	Intake Team	Holland & Hart LLP	Yes	12/28/2022 4:55 PM MST

 **Support**

Status	Name	Firm	Served	Date Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	12/28/2022 8:50 AM MST

Filing Type
EFileAndServe

Filing Code
Notice

Filing Description
of Intent to Serve Subpoena Duces
Tecum to Freedom Tabernacle,
Incorporated

Filing Status
Accepted

Accepted Date
12/28/2022 3:40 PM MST

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena - Freedom Tabernacle.pdf	Notice of Intent to Serve Subpoena Duces Tecum to Freedom Tabernacle, Incorporated	Public	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	12/28/2022 4:56 PM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Diego Rodriguez	Individual	Yes	12/27/2022 4:06 PM MST

Filing Type
EFileAndServe

Filing Code
Notice

Filing Description
of Intent to Serve Subpoena Duces
Tecum to Power Marketing Agency, LLC

Filing Status
Accepted

Accepted Date
12/28/2022 3:40 PM MST

 **Support**

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena - Power Marketing Agency.pdf	Notice of Intent to Serve Subpoena Duces Tecum to Power Marketing Agency, LLC	Public	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	12/28/2022 4:57 PM MST
Sent	Diego Rodriguez	Individual	Yes	12/28/2022 4:31 PM MST

Filing Type

EFileAndServe

Filing Code

Notice

Filing Description

of Intent to Serve Subpoena Duces Tecum to Power Marketing Consultants LLC

Filing Status

Accepted

Accepted Date

12/28/2022 3:40 PM MST

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena - Power Marketing Consultants.pdf	Notice of Intent to Serve Subpoena Duces Tecum to Power Marketing Consultants LLC	Public	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	12/28/2022 4:58 PM MST
Sent	Diego Rodriguez	Individual	Yes	12/28/2022 4:31 PM MST

 Support

Parties with No eService

Name **Address**

Chris Roth

Name **Address**

Natasha D Erickson

Name **Address**

Ammon Bundy

Name **Address**

Ammon Bundy for Governor

Name **Address**

Freedom Man PAC

Name **Address**

Peoples Rights Network

Name **Address**

Freedom Man Press LLC

Name **Address**

St Lukes Health System LTD

Name **Address**

Tracy W Jungman

Fees

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	



Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
Envelope Total: \$0.00	

Transaction Amount	\$0.00	
Transaction Id	7506628	
Filing Attorney	Erik Stidham	Order Id
Transaction Response	Authorized	

© 2023 Tyler Technologies
Version: 2022.0.0.9916

