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Counsel for Plaintiffs

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

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

Plaintiffs,

vs.

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

Defendants.

Case No. CV01-22-06789

**AFFIDAVIT OF NATASHA D.
ERICKSON, M.D. IN SUPPORT OF
PLAINTIFFS' MOTION FOR
CONTEMPT AGAINST DEFENDANT
DIEGO RODRIGUEZ**

STATE OF IDAHO)
 :SS.
County of ADA)

I, Natasha D. Erickson, M.D., being first duly sworn upon oath, depose and state as follows:

1. I make this declaration based on my personal knowledge.

2. I am a pediatric physician at the St. Luke’s Regional Medical Center in Boise (“St. Luke’s Boise”). My job is to diagnose and treat sick children. I am an employee of St. Luke’s Health System, Ltd. (“St. Luke’s”) and am not an agent or employee of the Idaho Department of Health and Welfare (“DHW”) or any other government entity.

3. On March 1, 2022, the parents of a ten-month-old infant (the “Infant”) brought the Infant to St. Luke’s Boise because the Infant had been [REDACTED].

4. I, along with other St. Luke’s providers, diagnosed the Infant with [REDACTED] and began treatment that included [REDACTED]. This treatment succeeded and the Infant [REDACTED]. By March 4, 2022, the Infant had begun to bottle feed. During this period, I and other St. Luke’s providers informed the Infant’s parents about the Infant’s treatment. The Infant’s parents consented to the Infant’s treatment at St. Luke’s Boise.

5. On March 4, 2022, the Infant’s parents insisted that they take the Infant home. While I would have preferred that the Infant stay at least another day given his condition, I agreed to discharge the Infant but told the Infant’s parents that follow-up evaluations of the Infant would be medically necessary. Upon discharge, I and other St. Luke’s providers decided to leave [REDACTED]

[REDACTED].

6. I did not inform DHW or any other government entity about the Infant at any time.

7. I understand that on March 11, 2022, the Meridian police declared the Infant at risk of imminent harm, found the Infant, and transported the Infant to a St. Luke's hospital in Meridian ("St. Luke's Meridian"). I played no role in any of those events. I did not refer the Infant to CPS. I had no contact with the police or DHW about the Infant on March 11, 2022 or at any other time.

8. I happened to be on shift at St. Luke's Boise in the early morning of March 12, 2022. That morning, the Infant was transferred from St. Luke's Meridian to the pediatric floor of St. Luke's Boise. I admitted the Infant and, along with other St. Luke's providers, diagnosed the Infant with severe [REDACTED] and [REDACTED]. The Infant had lost significant [REDACTED] since the Infant's March 4th discharge and, among other symptoms, had [REDACTED] and [REDACTED] consistent with [REDACTED]. The Infant's [REDACTED] was no longer in place.

9. Shortly after March 12, 2022, I learned that I was being targeted online by Rodriguez, Freedom Man Press, and the People's Rights Network ("PRN"). I understood that Rodriguez, Freedom Man Press, and PRN were publishing false statements about the Infant's medical condition and were stating that I had falsely reported the Infant to CPS and was a key figure in a huge kidnapping and child trafficking conspiracy. This caused me to fear for the safety of my family and myself.

10. On March 15, 2022, I was not at the hospital when an armed mob forced the hospital to go into lockdown, but I received notification of the event via text. I immediately feared for the safety of my patients and my colleagues in the hospital. When I went to work that night for another night shift, I was anxious about approaching the hospital, uncertain if my

personal safety was compromised. I notified my husband with excessive frequency of when I had departed or arrived at work, even in the middle of the night or early hours in the morning. I also requested security escorts to my vehicle when leaving the hospital which I have never done while working at St. Luke's or at any other hospital in my career.

11. I understand that the website www.freedomman.org accused me of kidnapping the Infant. I also understand that the website www.peoplesrights.org calls me a "criminal[] with a license to kidnap babies from their nursing mothers," posting my full name and photo with this statement. These accusations are false. Between March 1, 2022 and March 4, 2022, the Infant's parents admitted the Infant to St. Luke's Boise. On March 12, 2022, the Meridian police department brought the Infant to St. Luke's. At the time I assumed, and now actually know, that the police had lawful authority to bring the Infant to St. Luke's.

12. I understand that the website www.freedomman.org posts my photo with the title, "CPS Referrer and Destroyer of Families: Dr. Natasha Erickson," then goes on to imply I abused the Infant's family and other families, stating, "imagine how many other families she has abused in her years of work at St. Luke's?" This is false. I always provide medical care in the best interest of the child. I did not refer the Infant or the Infant's parents to CPS.

13. I understand that Diego Rodriguez doxed me via his website www.freedomman.org, which posts my name, contact information, biography, and photo on the same page that he calls me abusive and a "Destroyer of Families." St. Luke's took this information off its website to protect my safety, but Rodriguez offered it to his followers to invite them to harass and threaten me.

14. On or about May 11, 2022, I became one of the plaintiffs in this lawsuit. The decision to become a plaintiff was made after careful consideration. I agreed to become a

plaintiff because I believe that we must stand up to the lies and intimidation from people like Bundy and Rodriguez. So, I agreed to be a plaintiff in this lawsuit to protect patients and staff from further harm and harassment and hope to get some measure of justice for myself and my family. I understood that Rodriguez, Bundy, the other defendants, and their followers might continue to make false statements and harass me but I did hope the Court would take steps to force them to comply with the law and the rules of our legal system.

15. I understand that on January 19, 2023, the Court entered a Protective Order to prevent the intimidation and harassment of witnesses. My family and I have received no protection from the Protective Order. If anything, it feels like the harassment and intimidation have increased since the Protective Order was put in place. Bundy, Rodriguez, PRN, and Freedom Man Press seem to have escalated and spread their false narrative of kidnapping and conspiracy and have increased the false statements that are directed at me.

16. Even after the Protective Order was put in place, the false accusations and doxing caused and continue to cause me mental distress and reputational harm. These public accusations of kidnapping and harming children have adversely affected my sleep patterns and created anxiety and stress. These defamatory actions, coupled with the incitements to harass me and my family and implied threats of violence from Defendants' followers, have had a traumatic effect.

17. Owing to the false statements and harassment caused by Defendants, I have experienced the symptoms indicative of post-traumatic stress syndrome, including (1) at least one re-experiencing symptom, (2) at least one avoidance symptom, (3) at least two arousal and reactivity symptoms, and (4) at least two cognition and mood symptoms.

18. As for re-experiencing symptoms, I have experienced flashbacks accompanied by physical symptoms, reoccurring memories of the threats, distressing thoughts, and physical signs of distress such as racing heart and perspiration.

19. I have experienced avoidance symptoms such as staying away from places and activities owing to concern for my safety, the safety of my family and friends, those in my care, and those who attend my place of worship. These symptoms have caused me to make changes in my routines and activities.

20. I have experienced arousal and reactivity symptoms, including being more easily startled, feeling tense, and difficulty sleeping. These symptoms have occurred in common place occurrences such as when I am asked for personal information when making a transaction or such as when a stranger makes small talk inquiring about my children.

21. I have experienced cognition and mood symptoms owing to the trauma, such as negative thoughts about my circumstances and ongoing negative emotions.

22. This mental distress has disrupted my daily life and made it more difficult for me to do my job as a pediatric physician.

23. This distress due to the doxing, intimidation, and false statements by Defendants about me, has caused me to seek counseling. I have incurred medical bills as a result. I intend to see my counselor, as needed, and to employ the strategies and practices my counselor has directed to manage the mental distress I am experiencing.

24. I am concerned for the safety of my family and for my own personal safety. Defendants' lies have falsely portrayed me as a criminal and a despicable person engaged in child trafficking. I worry that these lies will cause one or some of Bundy's or Rodriguez's

followers to act violently toward my family or me. Because of this, I purchased a security system and security cameras for around my home. We continue to be on the watch for intruders.

25. I have also continued to suffer harm to my reputation. I became a pediatrician because I care about children and want to help them and their families. Being accused of crimes against children obviously harms my reputation. It also casts a shadow over my career.

26. Moreover, the impact is repeated each time Defendants make another defamatory statement about me and grows each day that Defendants persist in keeping the defamatory postings up on the websites they control.

27. Relevant to this motion, since the filing of the Protective Order, Diego Rodriguez has continued to target me online on his website freedomman.org, falsely accusing me of calling CPS and being responsible for the Infant's "kidnapping." He has also doxed me, posting my photo and full name on his webpage titled "People Responsible for [the Infant's] Kidnapping[.]"

28. This false rhetoric is harassing and threatening. It invites others to take action against me, including members of PRN, who are part of Rodriguez's audience. PRN openly condones violence. See https://www.peoplesrights.org/news_view/?/there-is-no-silver-bullet-to-securing-liberty&id=2b476184-0ac7-4e47-bbeb-8174072d5e73&pg=2.

29. There is no end to Rodriguez's misrepresentations. Just a few days ago, Rodriguez falsely stated that I "use threats of CPS to control" patients. See <https://freedomman.org/2023/judge-lynn-norton-and-erik-stidham-just-gag-ordered-me/>.

30. I understand that the threats and the intimidation are causing important witnesses, people expressly covered by the terms of the Protective Order, to decline from testifying in this lawsuit. I understand that others are unwilling to serve as witnesses because they are concerned for their own safety and the safety of their families. It seems completely unfair and unjust that

my ability to pursue my legal claims is being undercut because Rodriguez, Bundy, PRN, and Freedom Man Press are allowed to bully, intimidate, and threaten witnesses.

31. My right to pursue legal claims against Rodriguez, Freedom Man Press, Bundy, and PRN is under attack. I am abiding by the laws and rules of the Court. Rodriguez, Bundy, PRN and others are not. I request that the Court take action to enforce its orders in this case.

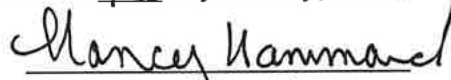
I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 1st day of May, 2023.



Natasha D. Erickson, M.D.

SUBSCRIBED AND SWORN TO before me this 1st day of May, 2023.



(Signature of notarial officer)



CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2023, I caused to be filed via iCourt and 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
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9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
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- Overnight Mail
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Orlando, FL 32804

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freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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