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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 CHRIS ROTH IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CONTEMPT AGAINST
DEFENDANT DIEGO RODRIGUEZ**

STATE OF IDAHO)
 :ss.
County of ADA)

I, Chris Roth, 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 plaintiff in this lawsuit against Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and the People’s Rights Network (“PRN”) (collectively “Defendants”).

3. I am the President and CEO of St. Luke’s Health System, LTD (“St. Luke’s”), an Idaho-based, not-for-profit, regional health system with over 14,000 employees.

4. I am aware that Defendant Diego Rodriguez posted on his website freedomman.org a public blog entry stating, among other things, that I “mak[e] money off of child trafficking” (the “Blog Entry”). See <https://freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>. That statement is false.

5. Even after the court entered a protective order, Rodriguez has maintained the Blog Entry on his website.

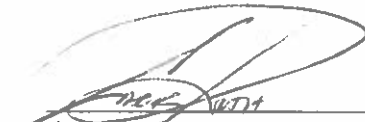
6. I am also aware that Rodriguez is a prominent member of PRN. The PRN website has posted links to freedomman.org web pages about the Infant, directing other PRN members to freedomman.org.

7. PRN has posted statements about the use of violence against those they oppose. For instance, see https://www.peoplesrights.org/news_view/?there-is-no-silver-bullet-to-securing-liberty&id=2b476184-0ae7-4e47-bbeb-8174072d5e73&pg=2. (“There is no silver bullet to securing liberty. It is going to take unity, suffering and the willingness to use violence in defense, like it always has.”).

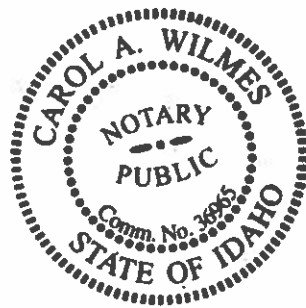
8. Especially when taken in context with the statements about violence from PRN, the Blog Entry is harassing and appears to be intended to intimidate or otherwise inhibit my testimony and participation in this lawsuit.


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

Executed this 2ND day of May, 2023.


Chris Roth

SUBSCRIBED AND SWORN TO before me this 2ND 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

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Ammon Bundy
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- Email/iCourt/eServe:

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

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People's Rights Network
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Freedom Man Press LLC
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1317 Edgewater Dr. #5077
Orlando, FL 32804

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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