

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,

Defendants.

Case No. CV01-22-06789

**AFFIDAVIT OF DAVID JEPPESEN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CONTEMPT AGAINST
DEFENDANT DIEGO RODRIGUEZ**

STATE OF IDAHO)
 :SS.
County of ADA)

I, David Jeppesen, being first duly sworn upon oath, depose and state as follows:

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

2. I am the Director of the Idaho Department of Health and Welfare (“DHW”). I have served as Director since January 2019. My office is based in Boise. I am generally familiar with the circumstances surrounding DHW’s intervention on behalf of Diego Rodriguez’s infant grandson in March 2022.


3. I am aware that Diego Rodriguez, a defendant in the above-captioned case, posts content on the website freedomman.org (the “Freedom Man website”). I am aware that Rodriguez has targeted DHW employees with defamatory statements on the Freedom Man website, including individuals who were specifically named in the court’s protective order. I also understand that Rodriguez doxed DHW employees on the Freedom Man website, posting their photos and names alongside false and maligning statements. These posts appear to be efforts to harass and intimidate the individuals targeted.

4. I have also been targeted by Rodriguez online. For instance, Rodriguez has posted the webpage found at <https://www.freedomman.org/2023/idaho-department-of-health-and-welfare-is-the-bad-guy/> which defames me, calling me a pedophile. Rodriguez’s statements about me are false and appear to be meant to harass me and intimidate me from participating as a witness in this lawsuit or otherwise telling the truth about him and the circumstances surrounding DHW’s intervention on behalf of Rodriguez’s infant grandson in March 2022.

5. During March 2022, when Ammon Bundy and Diego Rodriguez were mobilizing their followers to disrupt St. Luke's hospital, approximately fifteen of their followers came to my home, where fortunately law enforcement officers also showed up. I don't know why else Bundy's and Rodriguez's followers would go to a person's house except to intimidate. My concern is that if Rodriguez can attempt to intimidate or threaten the Director of an agency (DHW) like this, no DHW employee is safe either.

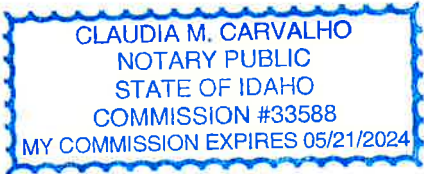
I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.


Executed this 2nd day of May, 2023.



David Jeppesen

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

- 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

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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

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