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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 DEVIN BURGHART IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CONTEMPT AGAINST
DEFENDANT DIEGO RODRIGUEZ
FOR VIOLATIONS OF PROTECTIVE
ORDER**

6. Diego Rodriguez is a recognized leader within PRN, who works closely with Bundy, recruits others to PRN membership, and publicizes and markets conspiracy theories through his website freedomman.org.

7. Bundy and Rodriguez have mobilized PRN to harass St. Luke's, Chris Roth, Dr. Natasha Erickson, NP Tracy Jungman, and others relating to the Idaho Department of Health & Welfare's intervention regarding an Infant in March of 2022. The harassment has been ongoing since the intervention and persists to this day.

8. Rodriguez, via his own direct harassment and from his platform as a leader of PRN, poses a real and present danger to the community and to St. Luke's, Chris Roth, Dr. Natasha Erickson, and NP Tracy Jungman. While PRN speaks in terms of "defending rights," it defines "defense" and "rights" in such a way that they really are just advocating the use of violence to reach their objective of imposing their desired type of Christian Nationalist government on others. PRN's leadership and membership includes paramilitary and militia-type group members. PRN was established—and operates—as an "Uber-like" militia response system. PRN's messaging is intended to incite fear and promote violence. PRN uses harassment, intimidation, threats of violence, and doxing to silence those it opposes and push its agenda. PRN is willing and able to use violence to accomplish its objectives.


9. The statements from Rodriguez, included in the exhibits to the Affidavit of Jennifer Jensen, are examples of his intentional use of false narratives to intimidate and threaten St. Luke's, Chris Roth, Dr. Natasha Erickson, NP Jungman, and other individuals involved in the medical treatment of the Infant while the Infant was in CPS custody. Rodriguez uses the false narratives to target Plaintiffs and identify them as enemies, the "wicked." As Rodriguez

perpetuates this rhetoric to his base, which includes PRN members, he increases the likelihood that a follower will be radicalized to take violent action.

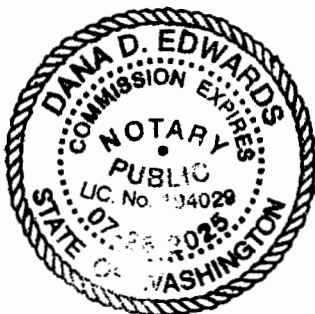
10. It is my opinion that Rodriguez will be emboldened to even worse conduct and further threaten the safety of Plaintiffs and their families (and others)—if he is not held accountable for their actions and forced to stop harassing, intimidating, threatening, and doxing Plaintiffs. If Rodriguez is allowed to continue to disregard the legal system and laws, to flout orders of the Court, and target the Plaintiffs and witnesses in this lawsuit, without meaningful consequences, the potential consequences for Plaintiffs and others are significant.


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

Executed this 1 day of May, 2023.


Devin Burghart

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:

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/s/ Erik F. Stidham

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