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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 KRISTEN NATE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CONTEMPT AGAINST
DEFENDANT DIEGO RODRIGUEZ**

STATE OF IDAHO)
 :ss.
County of Ada)

I, Kristen Nate, 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 Child Welfare Chief for the Idaho Department of Health and Welfare, in the division of Family and Community Services, Child and Family Services Region IV.
3. I am aware of statements that Diego Rodriguez has made about me, publicly online through his freedomman.org website. Among other things, Rodriguez falsely states that I am “a tyrant,” I am “a vindictive, angry, Christian hating, political leftist, who loves power and seeks every opportunity to destroy godly families with whom [I] disagrees ideologically,” and that I have “that very reputation.” Rodriguez’s doxing and false accusations are harassing and troubling.
4. I understand that on January 19, 2023, the Court entered a Protective Order in this case to prevent the intimidation and harassment of potential witnesses. From my perspective, the Protective Order has not halted the intimidation because the statements from Rodriguez are still posted publicly online through his freedomman.org website. My family and I have received no protection from the Protective Order.
5. To my understanding, Rodriguez has done nothing since the Protective Order was put in place to eliminate the false statements regarding me and other witnesses and potential witnesses in this lawsuit. For example, Rodriguez continues to publish defamatory statements with my picture calling me a “leftist, liberal, lesbian.” See

<https://freedomman.org/cyrus/archive/impossibility-of-cps-social-workers-objectivity/> (image from web site below) (last visited on May 2, 2023).



6. The photo above includes a photoshop image of my face onto a figure holding a gun. The body in the image is not mine and the content of the image disturbs and upsets me.

7. The threats and intimidation about me on Rodriguez's web site extend to include troubling posts of photographs of my friends and family members, including my mother.

8. Rodriguez has falsely accused me of being biased in the performance of my job and that I am a liar who attempted to harm people with a disregard for the safety and welfare of the infant central to this case. This conduct appears to be intended to intimidate and harass me.

9. The threats, intimidation, and false narrative promoted by Rodriguez and Ammon Bundy have impacted my entire staff at the Idaho Department of Health and Welfare, in the division of Family and Community Services, Child and Family Services Region IV. Specifically, the false narrative that CPS social workers and others in our office are part of a

“child kidnapping” and “sex trafficking” scheme for monetary gain have contributed to distrust by parents and guardians and have even impacted our child clients. I am also aware that Rodriguez has specifically targeted others in the office, including that he has posted intimidating and threatening accusations about Kelly Shoplock, a social worker in the office.

10. The doxing, misrepresentations, and rhetoric Rodriguez has used against me and others in our office cause me ongoing stress and anxiety. I am concerned for the safety of my family, colleagues, child clients, parents and guardians, and myself.

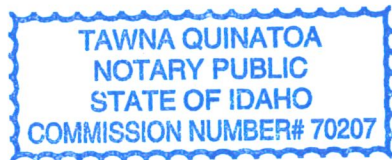
11. Rodriguez’s tactics of intimidation have made it difficult for me to feel safe in presenting this information to the court.


12. 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.


Kristen Nate

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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People's Rights Network
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Emmett, ID 83617-3601

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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