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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 KELLY SHOPLOCK IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR CONTEMPT AGAINST  
DEFENDANT DIEGO RODRIGUEZ**

STATE OF IDAHO            )  
  :SS.  
County of Ada                )

I, Kelly Shoplock, 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 social worker for the Idaho Department of Health and Welfare, in the division of Family and Community Services, Child and Family Services.
3. I am aware of statements that Diego Rodriguez has made about me, publicly online through his freedomman.org web site. Among other things, Rodriguez falsely states that I am “a social worker in Idaho’s child trafficking machine, called CPS (Child Protective Services), but better described as Child Profiting Systems.” Rodriguez’s doxing and false accusations are harassing and troubling.
4. I understand a Protective Order was entered by the Court in this lawsuit on January 19, 2023, and that the purpose of the order was to prevent intimidation and harassment of witnesses and potential witnesses, like myself.
5. Despite the entry of the Protective Order, Rodriguez continues the publication of defamatory statements that include my image where he calls me, among other things, an “evil cog in Idaho’s Child Trafficking Machine”, an “evil woman”, and a “frustrated tyrant.” See <https://freedomman.org/cyrus/archive/meet-kelly-shoplock-an-evil-cog-in-idahos-child-trafficking-machine/> (image from web site below) (last visited on May 2, 2023).



6. Rodriguez identified my husband with his full name on the [www.freedomman.org](http://www.freedomman.org) web site and posted a photograph of my husband and me along with a Biblical quote that suggests we should be “put to death” (image from website below). The image is led by the following statement: “*Kelly and Joseph Shoplock, please take into consideration what God said about people like you who are accomplices to kidnapping:*”



7. My husband has faced questions in his workplace and otherwise about Rodriguez's false accusations about my husband's behavior. I worry about the safety of our children because of the false, harassing, and threatening accusations Rodriguez has posted on his web site about myself and my husband.

8. The doxing and false accusations by Rodriguez of and about me have impacted my ability to do my job by causing distrust by clients, parents, and/or guardians I work with. Specifically, the accusation that I am a "child trafficker" continues to come up for me professionally on a regular basis.

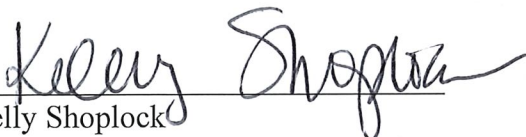
9. The false narrative promoted by Rodriguez and Ammon Bundy that CPS social workers and others who work for our office are involved in a "child trafficking machine" that puts profits over the welfare of children in Idaho has impacted the sense of safety and security I feel at work.

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

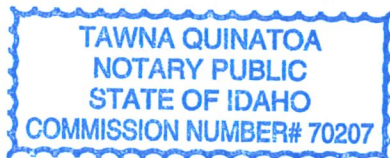
11. Rodriguez's tactics of intimidation made it difficult for me to decide to provide this affidavit to the Court.


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.

  
Kelly Shoplock

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	<input checked="" type="checkbox"/> U.S. Mail
P.O. Box 370	<input type="checkbox"/> Hand Delivered
Emmett, ID 83617	<input type="checkbox"/> Overnight Mail
	<input type="checkbox"/> Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/> U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/> Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/> Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/> Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/> U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/> Hand Delivered
Emmett, ID 83617-3601	<input type="checkbox"/> Overnight Mail
	<input type="checkbox"/> Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/> U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/> Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/> Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/> Email/iCourt/eServe:

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P.O. Box 370	<input type="checkbox"/> Overnight Mail
Emmett, ID 83617	<input type="checkbox"/> Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/> U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/> Hand Delivered
1317 Edgewater Dr. #5077	<input type="checkbox"/> Overnight Mail
Orlando, FL 32804	<input type="checkbox"/> Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/> U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/> Hand Delivered
9169 W. State St., Ste. 3177	<input type="checkbox"/> Overnight Mail
Boise, ID 83714	<input type="checkbox"/> Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/> U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/> Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/> Overnight Mail
Orlando, FL 32804	<input type="checkbox"/> 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](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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