

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**

<p>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,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>AMENDED SUBPOENA FOR DEPOSITION DUCES TECUM OF POWER MARKETING CONSULTANTS LLC</p>
---	--

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 23, 2023, from 9:00 a.m. to noon

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 23, 2023, at 9:00 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: May 5, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2023, I caused to be 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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- Hand Delivered
- Overnight Mail
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c/o Ammon Bundy
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Emmett, ID 83617

- U.S. Mail
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- 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

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375507_v1

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or

refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare’s intervention involving Diego Rodriguez’s infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
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8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

2023-CA-11922

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM

THE STATE OF FLORIDA SENDS GREETINGS TO:

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
you appear and attend a videotaped deposition on the **23rd day of May, 2023, at the hour of
9:00 a.m.** at the offices of **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho
83702.** Your attendance is required to give testimony and/or to produce and permit inspection
and copying of documents or tangible things in your possession, custody or control.

///

///

If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. Please see **Exhibit "A"** attached hereto for the topics and documents you are requested to bring to the deposition.

DATED this ____ day of May, 2023.

MAY 05 2023

TIFFANY MOORE RUSSELL

CLERK OF COURT

By: _____
Deputy



Herry

Submitted by:

By: /s/Erik F. Stidham

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

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information

("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

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2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
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9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

**IN THE CIRCUIT COURT OF THE NINTH
JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA**

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

**NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
OF NON-PARTY WITNESS IN OUT-OF-STATE CASE**

TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

Plaintiffs, by and through their undersigned counsel, hereby gives notice of taking the deposition of POWER MARKETING CONSULTANTS LLC on **May 23, 2023, at 9:00 a.m. at Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho 83702.** Power Marketing

Consultants LLC shall designate an officer, director, or managing agent, or other person who consents to do so (the “Representative”), to testify on its behalf as to matters known or reasonably available to the organization with the areas of inquiry listed on the attached **Exhibit A**.

The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules. The deposition will continue from day-to-day until completed and will be videotaped.

The Representative shall also produce at his deposition the documents listed on the attached Exhibit A.

Dated: May 5, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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Emmett, ID 83617

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People's Rights Network
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Boise, ID 83714

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Orlando, FL 32804

- U.S. Mail
- Hand Delivered
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- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

EXHIBIT A

Power Marketing Consultants LLC

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as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
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7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

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