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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

AMMON BUNDY, AMMON BUNDY	)	Case No. 1:23-cv-00212-DCN
FOR GOVERNOR, DIEGO RODRIGUEZ,	)	
FREEDOM MAN PAC, PEOPLES	)	<b>DECLARATION OF JENNIFER M.</b>
RIGHTS NETWORK, and FREEDOM	)	<b>JENSEN IN SUPPORT OF</b>
MAN PRESS LLC,	)	<b>RESPONDENTS’ MOTION TO</b>
	)	<b>DISMISS PETITION OR REMAND TO</b>
Petitioners.	)	<b>STATE COURT</b>
	)	
vs.	)	
	)	
ST. LUKES HEALTH SYSTEM LTD, ST.	)	
LUKES REGIONAL MEDICAL CENTER	)	
LTD, CHRIS ROTH, NATASHA	)	
ERICKSON, MD, and TRACY	)	
JUNGMAN,	)	
	)	
Respondents.	)	
_____	)	

I, Jennifer M. Jensen, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. Attached hereto as **Exhibit A** is a true and correct copy of the redacted version of the Fourth Amended Complaint, filed in the lawsuit *St. Luke's Health System Ltd. et al. v. Ammon Bundy et al.*, pending in state court in the Fourth Judicial District, County of Ada. The Fourth Amended Complaint details Ammon Bundy's and the other Defendants' exploitation of a tragic situation surrounding an infant who was taken into protective custody by the Idaho Department of Health and Welfare. As detailed in the Fourth Amended Complaint, Bundy and the other Defendants caused disruptions at St. Luke's, including summoning an armed mob to the hospital and causing it to go into lockdown.

3. On May 11, 2022, a few weeks after Bundy incited the disruptions at St. Luke's, St. Luke's, its CEO Chris Roth, and one of the doctors who had been the target of Defendants' smear campaign Natasha Erickson filed suit against Bundy, People's Rights Network ("PRN"), Ammon Bundy for Governor ("Bundy Campaign"), Bundy's acolyte Diego Rodriguez, and Rodriguez's entities Freedom Man Press and Freedom Man PAC. The St. Luke's Parties brought state law claims for defamation, false-light invasion of privacy, intentional infliction of emotional distress, common law trespass, statutory trespass, violation of Idaho's Unfair Business Practices Act, violation of Idaho's Charitable Donations Act, and civil conspiracy.

4. All of the Plaintiffs are Idaho citizens. At least four of the Defendants are Idaho citizens—Ammon Bundy, PRN, Ammon Bundy for Governor, and Freedom Man PAC. As for Defendant Diego Rodriguez and Defendant Freedom Man Press, it is difficult to determine their citizenship. While Rodriguez claims to have moved out of Idaho, he has refused to answer discovery requests providing a current address, other than a "virtual" Florida address, where he asserts he does not reside but rather uses solely to receive his mail.

5. Bundy was served with the Complaint and Summons on July 12, 2022.

6. This case has been pending for almost a year in state court. Attached hereto as **Exhibit B** is a true and correct copy of the docket report from the lawsuit *St. Luke's Health System Ltd. et al. v. Ammon Bundy et al.*, pending in state court in the Fourth Judicial District, County of Ada, downloaded at my direction on May 8, 2023.

7. The case is set to go to trial in a few weeks, starting July 10, 2023. Bundy has never filed an appearance or anything else in the lawsuit, nor have the entities he controls (PRN and the Bundy Campaign). He was properly served with the then-operative summons and complaint on July 12, 2022, nearly ten months ago. Bundy and his entities are in default under the current operative complaint, the Fourth Amended Complaint.

8. Although Bundy and his entities have not appeared in the lawsuit, they have continued their smear campaign, adding new factual bases to the existing causes of action with the escalating misconduct. The first amendment added a new Plaintiff (Nurse Practitioner Tracy Jungman) when Defendants began to harass and dox her, spreading false conspiracy theories about her kidnapping and molesting children. The second and third amendments to the Complaint occurred concurrently—one amendment to allege punitive damages under Idaho Code § 6-1604 and one amendment to update factual allegations as they had developed during the pendency of the lawsuit. The St. Luke's Parties were granted a fourth amendment to the Complaint to add further factual allegations, substantiated by video evidence of Bundy's misrepresentations and harassment of the Plaintiffs, which he had perpetrated after the Third Amended Complaint had been filed.

9. Bundy and the other Defendants have obstructed the lawsuit's progress every step of the way, resulting in multiple orders granting sanctions and five motions for contempt. The state court has sanctioned Bundy multiple times and entered a preliminary injunction and

protective order requiring that Bundy stop harassing, intimidating, and threatening witnesses in the lawsuit. Attached hereto as **Exhibit C** is a true and correct copy of the Preliminary Injunction Order entered October 12, 2022. Attached hereto as **Exhibit D** is a true and correct copy of the Protective Order entered January 19, 2023. Four of the five motions for contempt have been against Bundy. Based on video evidence and online statements authored by Bundy and submitted with the contempt motions, the state court found probable cause that Bundy had indeed violated the court's orders prohibiting witness intimidation. Because Bundy refused to appear in court on the contempt proceedings, the court entered a warrant of attachment under I.R.C.P. 75, to bring him before the court (to satisfy statutory and due process requirements that he attend the hearing on contempt rather than have the contempt action proceed in his absence). In response, Bundy summoned his followers to form a blockade on his residential property, in order to prevent arrest by the sheriff—or at least to prevent a non-violent arrest.

10. With the trial for this case only weeks away, Bundy filed his Petition, seeking removal of a nearly one-year long lawsuit in which he has serially violated the state court's orders. Further, because Bundy is in default, the St. Luke's Parties are entitled to proceed against him whenever the state court permits on the issue of the amount of damages, including punitive damages. As Bundy is aware, on May 23, 2023, there is a scheduling conference to address the damages trial against him and his Defendant entities. If jurisdiction over the case is disrupted long enough through his removal action, he will obtain a delay in the judgment against him.

11. Bundy has publicly admitted that he is fraudulently hiding his assets. For instance, see <https://rumble.com/v22v9ik-interview-with-ammon-bundy-12282022.html>. In the video, Ammon Bundy makes the following statements:

- [The St. Luke’s Parties are] “probably going to try to get judgments of over a million dollars and take everything they [sic] have from me.” (45:37 to 45:45).
- “And uh and I’m not going to let that happen and I’m making moves you know to you know stop that from happening.” (45:45 to 45:52).
- “And it I have to you know meet ‘em on the front door with my you know friends and shotgun I’ll do that. They’re not going to take my property.” (45:52 to 46:00).
- “I’ve never once stepped inside a St. Luke’s hospital; never used their services ever; I don’t owe them any money.” (46:00 to 46:07).
- “And just because I said the truth in public about them and they didn’t like it, that doesn’t mean they get to take millions of dollars from me and destroy me, financially.” (46:07 to 46:15).
- “But destroying my entire life’s wealth...and literally uh you know kicking my family out in the streets by taking my home and taking you know my properties and all of that... that would be hard for me to swallow and you know... But I think the best way to respond to them is to protect my assets and uh just let them keep sending me these books every, every week, and just ignore them.” (49:17 to 49:58).

Permitting him to delay a judgment against him through a sham removal will only give him more time to do so.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

DATED: May 8, 2023

By: /s/Jennifer M. Jensen  
Jennifer M. Jensen

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of May, 2023, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

n/a

AND I FURTHER CERTIFY that on May 9, 2023 I served the foregoing on the following non-CM/ECF Registered Participants in the manner indicated:

Via first class mail, postage prepaid addressed as follows:

Ammon Bundy  
Ammon Bundy for Governor  
People's Rights Network  
4615 Harvest Lane  
Emmett, ID 83617-3601

Diego Rodriguez  
Freedom Man PAC  
Freedom Man Press LLC  
1317 Edgewater Dr. #5077  
Orlando, FL 32804

May 8, 2023 via email:

Ammon Bundy – aebundy@bundyfarms.com  
Diego Rodriguez - freedommanpress@protonmail.com

*/s/ Erik F. Stidham*

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Erik F. Stidham  
of HOLLAND & HART LLP

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# **EXHIBIT A**

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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 and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**FOURTH AMENDED COMPLAINT AND  
DEMAND FOR JURY TRIAL**

**(REDACTED)**

St. Luke’s Health System, Ltd. (“SLHS”), St. Luke’s Regional Medical Center, Ltd.

(“SLRMC”), Chris Roth (“Mr. Roth”), Dr. Natasha D. Erickson (“Dr. Erickson”), and Tracy W.

Jungman, NP (“NP Jungman”), collectively “St. Luke’s Parties” or “Plaintiffs,” by and through



their counsel, Holland & Hart, LLP, hereby bring this Complaint against Ammon Bundy (“Bundy”), Ammon Bundy for Governor (“Bundy Campaign”), Diego Rodriguez (“Rodriguez”), Freedom Man Press LLC (“FMP”), Freedom Man PAC (“FM PAC”), and the People’s Rights Network (“PRN”), collectively “Defendants,” and allege as follows:

### **NATURE OF THE CASE**

1. Defendants engaged in a gift, recklessly exploiting [REDACTED] of an Infant to gain money and publicity for themselves. Seeking to benefit financially, to enhance their standing among their followers, and to grow the membership of and revenues from PRN, Bundy (a former candidate for Governor and founder and leader of the activist People’s Rights Network) and Rodriguez (an aspiring political and religious figure, acolyte of Bundy, and consultant and spokesperson for the Bundy Campaign) acted in concert with the other Defendants to launch a knowingly dishonest and smear campaign that claimed Idaho State employees, the judiciary, the police, primary care providers, and the St. Luke’s Parties engaged in widespread kidnapping, trafficking, sexual abuse, and killing of Idaho children.

2. In furtherance of their smear campaign, Defendants used slick marketing tactics and disinformation to launch a coordinated attack of defamation and organized business disruption against the St. Luke’s Parties. Defendants incited and agitated their followers with false conspiracy theories of the kidnapping, trafficking, sexual abuse, and killing of children purposefully creating the risk that their followers would threaten or actually commit acts of violence against the St. Luke’s Parties. Defendants made no effort to conceal their improper objectives. Indeed, they publicly declared that they wanted to subject the St. Luke’s Parties to unrelenting public shaming that would cause reputational damage and humiliation of such intensity that SLHS and SLRMC would be run out of business and Mr. Roth, CEO of SLHS, Dr. Erickson, a St. Luke’s pediatric physician, and NP Jungman, a St. Luke’s nurse practitioner,

would lose their careers and be shunned by their friends, colleagues, neighbors, spouses, and children.

3. As a premise for their wrongful actions, Defendants mischaracterized the Idaho Department of Health and Welfare's ("DHW") decision to intervene to ensure the health and safety of [REDACTED] Bundy, Rodriguez, and the other Defendants falsely claimed that DHW's intervention was wholly without basis and was an example of the widespread government conspiracy of kidnapping, trafficking, sexual abuse, and killing of children for financial gain.

4. Defendants falsely stated that the St. Luke's Parties were participants in this nefarious organized ring and had participated in the kidnapping and mistreatment of the Infant. Among other things, Defendants falsely stated that (1) the St. Luke's Parties initiated and caused the State's intervention relating to the Infant, (2) the Infant had no need for medical care from the St. Luke's Parties, (3) the St. Luke's Parties provided unnecessary and improper medical treatment to drive up medical bills for the Infant's parents, (4) the St. Luke's Parties harmed the Infant, (5) the St. Luke's Parties had the authority to release the Infant but were illegally refusing to do so, and (6) that St. Luke's was conspiring with Idaho Governor Brad Little (Bundy's political opponent) in targeting the Infant. The Defendants made these false statements and others relating to the St. Luke's Parties while knowing the statements to be without factual basis or recklessly disregarding the truth.

5. Bundy and Rodriguez coordinated the wrongful attacks to further a number of improper objectives, including (1) to harm the St. Luke's Parties, (2) to subvert the authority and rulings of the judiciary through harassment, (3) to mislead and manipulate their followers, (4) to enhance their political reputations and personal brands, (5) to grow membership in the PRN,

(6) to drive traffic to Defendants' websites, (7) to benefit themselves financially through financial contributions, donations, and fees paid to the Bundy Campaign, Rodriguez's political action committee (FM PAC), the PRN, a supposed charity benefitting Rodriguez's family, Bundy's entities Dono Custos, Inc. and Abish-husbandi, Inc., and Rodriguez's entity Freedom Tabernacle Incorporated and Power Marketing Agency, LLC and Power Marketing Consultants LLC .

6. The St. Luke's Parties bring this lawsuit to protect patients and staff from further harm, defamation, harassment, and threats of violence and to ensure that political bullying and Defendants' grift do not prevent St. Luke's from furthering its mission to improve the health of people in the communities it serves.

#### **PARTIES, VENUE, AND JURISDICTION**

7. At all times relevant hereto, Plaintiff SLHS was and is a not-for-profit corporation doing business in Idaho with its principal places of business in Ada County, Idaho.

8. At all times relevant hereto, Plaintiff SLRMC was and is a not-for-profit corporation doing business in Idaho with its principal places of business in Ada County, Idaho.

9. At all times relevant hereto, Plaintiff Mr. Roth was and is President and CEO of SLHS and a resident of Idaho.

10. At all times relevant hereto, Plaintiff Dr. Erickson was and is a physician specializing in pediatric medicine. She is an employee of SLRMC and a resident of Idaho.

11. At all times relevant hereto, Plaintiff NP Jungman was and is a nurse practitioner specializing in pediatrics. She is an employee of SLRMC and a resident of Idaho.

12. At all times relevant hereto, Defendant Ammon Bundy was and is a resident of Idaho. Bundy controls the Bundy Campaign and is the founder and leader of the PRN. Through his control of the PRN, Bundy effectively controls PRN's website, peoplesrights.org. Bundy

generates money for his use and benefit by marketing himself as an anti-government, quasi-religious leader.

13. Bundy owns and controls or owned and controlled at least two corporate entities (Dono Custos, Inc. and Abish-husbandi, Inc.) through which he generates revenues for himself from his campaign and leadership of PRN. Dono Custos receives money directly from members of PRN. Revenues received by Dono Custos are used to benefit Bundy. Abish-husbandi received payments directly from the Bundy Campaign and those payments benefited Bundy personally. The potential revenue to Bundy is significant. If each member of PRN annually contributes just \$50 to Bundy through Dono Custos, Bundy could pocket more than \$3,000,000 per year. Bundy directed tens of thousands of dollars contributed to the Bundy Campaign to Abish-husbandi.

14. On information and belief, the corporate personalities of Dono Custos and Abish-husbandi and Bundy are indistinguishable; Bundy exerts complete control over the entities and all decision making by the entities such that the entities operate as alter-egos of Bundy. On information and belief, Abish-husbandi and Dono Custos do not operate separately from Bundy, do not follow corporate formalities, and do not keep separate books.

15. At all times relevant hereto, Defendant Bundy Campaign was and is an Idaho political organization formed for the ostensible purpose of raising money to support Bundy's effort to become Governor of Idaho. Aaron Welling was the treasurer for the Bundy Campaign. Welling resigned in late spring 2022. After Welling's resignation, Bundy took over and became treasurer. Monies received by the Bundy Campaign were distributed to entities owned by Bundy and entities owned by Rodriguez.

16. At all times relevant hereto, Defendant Rodriguez was a resident of Idaho. Rodriguez promotes himself as a world-renowned marketing consultant, motivational speaker,

religious leader, author, and political activist. Rodriguez is a leader in the PRN, serves or served as a consultant to and spokesperson for the Bundy Campaign, controls the FMP and the FM PAC, and writes political attack columns for FMP under the alias “Gunner Steele.” Rodriguez is financially entangled with the other Defendants and seeks to benefit from the false conspiracy he manufactured. Rodriguez is the founder of Freedom Tabernacle Incorporated which purports to be a church but is used as an entity to receive contributions, dues, or payments from members of PRN. Also, Rodriguez is financially motivated to grow Freedom Tabernacle as he mandates members “tithe” 10% of their earnings. Rodriguez benefits from monies received by the Freedom Tabernacle and the growth of PRN. Rodriguez receives money from the Bundy Campaign through at least one of his business entities, Power Marketing. Rodriguez use his enhanced profile and the manufactured conspiracy relating to the Infant to sell three-day “training” courses through Power Marketing for which he charges \$15,000 per “student.”

17. On information and belief, the corporate personalities of Freedom Tabernacle Incorporated, Power Marketing Agency, LLC, and Power Marketing Consultants, LLC are indistinguishable from Rodriguez; Rodriguez exerts complete control over the entities and all decision making by the entities such that the entities operate as alter-egos of Rodriguez. On information and belief, Freedom Tabernacle, Power Marketing Agency, and Power Marketing Consultants do not operate separately from Rodriguez, do not follow corporate formalities, and do not keep separate books. To the extent the corporate entities have other individuals involved, they are the family members controlled by Rodriguez. Freedom Tabernacle, Power Marketing Agency, and Power Marketing Consultants are alter-egos of Rodriguez.

18. At all times relevant hereto, and based on information on freedomman.org, Defendant FMP held itself out as a limited liability company which owns and controls

freedomman.org, a website that specializes in political attacks and disinformation and advocates for the harassment of political opponents through “doxing.” FMP is not registered as an LLC in Idaho or registered to do business in Idaho. FMP, its website, and all content on the FMP website are controlled by Rodriguez.

19. At all times relevant hereto, FM PAC is and was an Idaho registered political action committee formed by and controlled by Rodriguez. FM PAC works in coordination with FMP and is promoted on freedomman.org.

20. Founded and controlled by Bundy, Defendant PRN is an unincorporated association of over 60,000 members. Like Bundy, PRN does not recognize the government’s authority over a person’s “life, liberty, or justly acquired property”; rather, PRN operates based on Bundy’s teachings that PRN members are divinely ordained to adjudicate supposed violations of “rights” and punish extrajudicially the “wicked” person, through harassment, doxing, or the use of force. PRN owns and operates the peoplesrights.org website. PRN markets itself as a network designed to defeat “government criminals” who seek to take away rights and freedoms. In truth, PRN is an unincorporated association controlled by Bundy which acts extra-judicially and uses doxing, harassment, economic disruption, and threats of violence to harass political enemies and to enhance Bundy’s personal power. At all times relevant hereto, PRN is controlled through Bundy’s operations in Emmett, Idaho. Rodriguez is actively involved in PRN. Defendants actively market and promote PRN with the objective of increasing the payments that members of PRN make to the entities Bundy and Rodriguez control, including Dono Custos and Freedom Tabernacle.

21. This Court has subject matter jurisdiction pursuant to Idaho Code § 1-705 and personal jurisdiction over the Defendants pursuant to Idaho Code § 5-514.

22. Venue is proper in this District pursuant to Idaho Code §§ 5-401 and 5-404.

### **GENERAL ALLEGATIONS**

#### **Role of the Idaho Department of Health and Welfare in Child Welfare**

23. Idaho's laws regarding child safety are primarily administered and implemented by DHW.

24. Idaho law imposes mandatory reporting requirements on Idaho residents to report concerns about a child's safety.

25. When a report is filed regarding child safety, DHW assesses the severity of the case. In high-danger cases, a social worker and possibly police visit the family to check on the child. Based on the visit and in consultation with the social or healthcare workers, police decide whether to declare the child in imminent danger. If the child is in imminent danger, police may place the child in temporary custody with DHW until a hearing can be held.

#### **The Role of St. Luke's in Child Health**

26. SLHS is the only Idaho-based not-for-profit health care system. SLRMC, a wholly owned subsidiary of SLHS, operates hospitals in Boise ("St. Luke's Boise") and Meridian ("St. Luke's Meridian"). SLHS and SLRMC share the same mission: to improve the health of people in the communities they serve.

27. The St. Luke's Parties are subject to State and Federal law. If a child is determined to be in imminent danger because of health issues and is transported to a St. Luke's hospital, the St. Luke's Parties will care for the child. However, SLHS and SLRMC are not agents of DHW or any other State of Idaho department. Mr. Roth is an employee of SLHS, and Dr. Erickson and NP Jungman are employees of SLRMC. They take no direction from DHW or any other State department.

#### **St. Luke's Care for the Infant**

28. On March 1, 2022, the parents took the Infant to the St. Luke's Boise emergency room (ER) because the Infant had reportedly [REDACTED] and had lost a [REDACTED]

29. A St. Luke's ER provider treated the Infant for [REDACTED]. Then, in consultation with the on-call pediatric specialist, Plaintiff Dr. Natasha Erickson, the ER provider admitted the Infant. The parents agreed to admission.

30. Upon admission, St. Luke's began to treat the Infant [REDACTED]. [REDACTED]. On March 2, 2022, a St. Luke's dietician diagnosed [REDACTED]. [REDACTED]. Due to this [REDACTED], the dietician and Dr. Erickson agreed on a plan to feed the Infant [REDACTED].

31. The Infant continued to struggle with oral feeding. Nevertheless, the parents repeatedly sought to take the Infant home early despite the risk to the Infant.

32. On March 3, 2022, Dr. Erickson met with the Infant's parents, and explained [REDACTED]. [REDACTED]. The parents agreed to let the Infant stay at St. Luke's for another day.

33. On March 4, 2022, the Infant's [REDACTED]. Although Dr. Erickson recommended [REDACTED] Infant home. Dr. Erickson agreed to discharge the Infant at the parent's request with [REDACTED]. [REDACTED] Dr. Erickson explained



that the Infant [REDACTED]

34. The parents were with the Infant throughout the Infant's hospitalization. They consented to all care at St. Luke's Boise Medical Center.

35. Neither Dr. Erickson nor any St. Luke's employee-initiated contact with child welfare or any other division of DHW regarding the Infant's hospitalization.

### **The Infant's Parents Fail to Attend Follow-Up Appointments**

36. Following discharge, St. Luke's tried to arrange a visit at the Infant's home on March 5 and March 6, 2022. However, the Infant's parents did not return their phone calls.

37. On March 7, 2022, the Infant's parents attended a follow-up appointment with the Infant's new primary care provider (PCP), who is not affiliated with St. Luke's. The

appointment revealed the Infant [REDACTED]

[REDACTED]. A follow up appointment was scheduled for March 10, 2022.

38. The parents attended the March 10, 2022, appointment. Again, the appointment revealed the Infant [REDACTED]. The PCP asked the Infant's parents to bring the Infant back for [REDACTED] on March 11, 2022.

39. The Infant's parents failed to bring the Infant to the [REDACTED] on the morning of March 11, 2022. When the family failed to appear for [REDACTED], the Infant's PCP referred the situation to DHW.

40. After hearing from the PCP, DHW determined that the Infant was in immediate danger involving a life threatening and/or emergency situation. DHW notified the Meridian

Police Department in accordance with DHW's standard practice. The Meridian PD began trying to locate the Infant.

41. Later on March 11, 2022, DHW reached out to NP Jungman, a nurse practitioner at St. Luke's CARES (Children at Risk Evaluation Services). The DHW safety assessor asked NP Jungman for a consult on the Infant's Priority I referral. NP Jungman reviewed the medical records from the Infant's initial admission, the Priority I referral, and the additional information provided from DHW, and advised DHW and the Meridian PD that the Infant be brought in for evaluation on March 11, 2022. She told DHW and the Meridian PD that if the family wanted to bring the Infant to St. Luke's CARES voluntarily, she would stay late that afternoon to save the family another visit to the ER. NP Jungman did not medically diagnose the Infant.

42. The Meridian PD continued to try and get a response from the parents and tried to locate the Infant.

43. That afternoon, DHW spoke by phone to the Infant's father, who said that the Infant and the Infant's mother were sleeping, but that they would come to CARES when they woke up. Despite the representation from the Infant's father, the Infant was not brought to CARES.

#### **Police Take Custody of the Infant**

44. Later on March 11, 2022, Meridian police went to the family's residence to check on the Infant's safety. The family refused to cooperate, provide information, or let the officers see the Infant, forcing the police to get a warrant.

45. Defendant Rodriguez stated he was present when the police visited the residence and was aware, at least by the time of the visit, that the police were looking for the Infant out of concern for the Infant's health.

46. Rodriguez took no steps to assist the police in obtaining information regarding the Infant.

47. When the police left the house to get a warrant, the Infant and the Infant's parents moved to another location.

48. Believing the Infant was at risk of imminent harm due to the Infant's [REDACTED], the parents' failure to follow medical advice, and the family's refusal to provide the police with information, the Meridian PD alerted its officers that the Infant was in danger and instructed them to look for the parents' vehicle.

49. The police located the Infant and the Infant's parents late on the night of March 11, 2022, in Garden City. When the Infant's parents refused to cooperate, the police took custody of the Infant and transported the Infant to St. Luke's Meridian in an ambulance.

50. At the time the Infant was taken into custody, the parents were informed that there would be a court hearing within 48 hours and that the ultimate objectives were to assure the safety of the Infant and keep the family unit intact.

51. The St. Luke's Parties had no authority regarding, did not participate in, and played no role regarding how the Infant was taken into custody.

**The Infant [REDACTED] at St. Luke's Boise**

52. In the early hours of Saturday, March 12, 2022, providers at St. Luke's Meridian evaluated the Infant and quickly decided to transfer the Infant to the pediatric floor of the St. Luke's Boise Medical Center for [REDACTED]

53. When the ten-month-old Infant was admitted to St. Luke's in Boise for a second time, the Infant [REDACTED]. The Infant had [REDACTED] [REDACTED] eight days earlier. The Infant's [REDACTED]

[REDACTED]

[REDACTED] The Infant's [REDACTED]. The Infant's [REDACTED]. The Infant had [REDACTED]. The Infant's [REDACTED] from March 4 to March 11, 2022.

54. Once again, St. Luke's [REDACTED]

[REDACTED] The Infant's [REDACTED]. The Infant began [REDACTED].

55. St. Luke's providers gave the Infant's parents detailed updates on the Infant's [REDACTED]. But despite the Infant's [REDACTED], the parents refused to provide medical information, including birth records, newborn screening, and prior medical records. The Infant's parents stated that they were withholding the medical information on advice from their attorney.

56. St. Luke's updated the Infant's parents on the Infant's status throughout the Infant's treatment. The Infant's parents consented to the Infant's treatment plan.

57. Contrary to Defendants' statements, St. Luke's did not vaccinate the Infant against the wishes of the parents. The St. Luke's Parties did not "harm [the Infant] in irreparable ways." Nor did they "abuse" the Infant. As explained below, such statements were false and were intended to attract media attention, incite followers, collect donations, disrupt hospital operations, and defame the St. Luke's Parties.

### **The Infant is Discharged and Returned to His Family**

58. Once again, [REDACTED]

[REDACTED]. On March 15, 2022, St. Luke's discharged the Infant as the Infant was

[REDACTED], and healthy enough for outpatient care.

St. Luke's decision to discharge the Infant was purely based on the Infant's medical condition, not the ongoing protests, pressure, or threats from Defendants or their followers discussed below.

59. The court proceedings relating to the Infant are confidential.

60. St. Luke's discharged the Infant to DHW, which in turn released the Infant to his parents on March 18, 2022.

### **Defendants Create a False Narrative**

61. As alleged above, St. Luke's doctors treated the Infant's [REDACTED]. [REDACTED]. The Infant was returned to the parents. DHW acted to ensure the safety of the Infant and pursued the goal of returning the Infant to the parents. The confidential court proceedings provided for by statute occurred.

62. Nevertheless, Bundy, Rodriguez, and the other Defendants chose to exploit the events surrounding DHS's intervention and the Infant's care to enhance their standing and to profit financially.

63. Defendants' prestige, political influence, personal brands, "business," and revenue all depend on Defendants' ability to market themselves as leaders in the fight against governmental overreach. The size of the membership of PRN, and, in turn, the amount of revenues flowing to the Bundy Campaign, Bundy's Dono Custos and Abish-husbandi entities, and Rodriguez's Freedom Tabernacle all depend on Defendants' efforts to market themselves as champions fighting against government conspiracies. Likewise, the more Rodriguez is able to raise his profile among his target market, the better chance he has to sell his followers services through Power Marketing.

64. Defendants perceived the events surrounding DHW's intervention as an opportunity to spread their lies and further their agendas. They realized that the facts

surrounding DHW's intervention could be mischaracterized as a governmental conspiracy to kidnap, traffic, and kill children. Then, in turn, Defendants realized they could establish themselves as crusaders against their falsely manufactured governmental conspiracy.

65. To that end, Defendants worked together to manufacture a false narrative of a state-sponsored child kidnapping and trafficking ring that included DHW, the police, the Idaho Judiciary, the Governor of Idaho, the Infant's PCP, and the St. Luke's Parties.

66. In support of their wrongful objectives, Defendants defamed the supposed members of the kidnapping and child trafficking ring and then incited their followers by stating that countless children, like the Infant, would be kidnapped, trafficked, and potentially killed unless immediate action was taken to destroy the St. Luke's Parties and others.

67. Defendants acted in concert to disseminate this false narrative. Evidence indicates that Bundy, Rodriguez, and the other Defendants coordinated talking points and the timing of demonstrations and provided the same directions to followers regarding how to disrupt the St. Luke's Parties. They told their followers to target the same individuals for doxing and harassment. Defendants mirrored false statements across the websites and social media they controlled.

68. Defendants operated as a single enterprise to defame and harm the St. Luke's Parties and others.

#### **Defendants Knowingly Harmed the St. Luke's Parties**

69. Defendants were aware of the likely impact of their joint actions. When they developed their plan, Bundy, Rodriguez, and the other Defendants knew that spreading their false claims would result in damage to the St. Luke's Parties, including death threats, business interruption, trespass, reputational damage, menacing crowds, and potentially mob violence.

70. Despite foreseeing the consequences, Bundy, Rodriguez, and the other Defendants acted to maximize harm and damage. As Rodriguez bragged publicly, Defendants wanted to harass and shame the St. Luke's Parties with claims of child kidnapping and murder such that St. Luke's employees would be shunned by their families and lose their careers, while St. Luke's itself would be run out of business. Bundy, Rodriguez, PRN and the other Defendants intended or acted recklessly to enflame followers so there would be violence or, at least a real threat of violence against the St. Luke's Parties.

71. Bundy, Rodriguez, and the other Defendants knew that a legal process existed to address the custody and welfare of the Infant. Bundy and Rodriguez were involved in and kept informed of all legal proceedings relating to the Infant.

72. Defendants knew their harassment and threats of violence they generated would not deter those targeted from doing what was best for the Infant. They knew that the judge would not be cowed into changing how she would rule in the case. They knew that DHW would not act contrary to what it believed was in the best interest of the Infant. They knew the St. Luke's Parties would not discharge the Infant until the Infant was medically ready for discharge. And they knew the St. Luke's Parties did not have the authority to determine whether the Infant would be discharged home or to a foster family.

73. Despite knowing that DHW, the trial court, and the St. Luke's Parties would not be threatened into abandoning the law or the Infant's best interests, Defendants engaged in their coordinated false statements and wrongful acts. Defendants did so because their wrongful acts were motivated by other goals.

74. The facts and circumstances indicate that Defendants' motives in creating and disseminating the false kidnapping and child trafficking narrative included, but are not limited to

the following goals: (1) generating support for the Bundy Campaign; (2) raising and monetizing the political profiles and personal brands of Bundy and Rodriguez, especially within the People's Rights Network and other political groups; (3) driving web traffic to sites controlled by Defendants; (4) solidifying control over their followers; (5) creating financial gain in the form of payments to and donations to Bundy's campaign, PRN, Rodriguez's PAC, and a fund that was established for Rodriguez's family; (6) generating more revenue for Rodriguez's Power Marketing entities and his Freedom Tabernacle Incorporated; and (7) generating more money for Bundy's entities, including Dono Custos and Abish-husbandi.

### **False Narrative Regarding DHW's Intervention**

75. Understanding the need to create a narrative that served a larger conspiracy theory, Rodriguez misrepresented the circumstances that led to DHW's intervention regarding the Infant. Among other things, Rodriguez, with assistance from the other Defendants, falsely asserted that the Infant was not at risk and had a "100% clean bill of health" when taken into custody, that the parents had only missed a single medical appointment, and that Dr. Erickson had reported the parents and the Infant to DHW.

76. In truth, Rodriguez knew or should have known that the Infant was [REDACTED] and faced significant [REDACTED]. Rodriguez knew the parents had failed to follow several steps needed to ensure the Infant was receiving needed medical care and failed to respond to those properly seeking information regarding the health of the Infant. Rodriguez further understood that he had no factual basis to assert that Dr. Erickson had contacted DHW. Dr. Erickson never contacted DHW regarding the Infant.



## **Bundy Trespasses at St. Luke's Meridian to Generate Publicity and Contributions**

77. Bundy has a history of forcing confrontation with police to generate publicity for himself and his political agenda and in order to make money for himself.

78. Shortly after the police took the Infant into custody, Bundy was made aware and took action to garner publicity and, in turn, make money for himself.

79. When Bundy learned that police had transported the Infant to St. Luke's in Meridian, Bundy and a group of his followers travelled to the hospital for the purpose of initiating a conflict with the police and potentially getting arrested. He knew that by orchestrating a protest and arrest at the hospital that he would win media attention, enhance his brand, and likely generate financial contributions for himself and the Bundy Campaign.

80. On Saturday, March 12, 2022, at around 1:30 a.m., Bundy and his followers entered the ambulance bay at St. Luke's in Meridian—a primary access point for medical emergencies. Once there, the group yelled and cursed at hospital staff and uniformed police officers. As Bundy planned, his followers were prepared with their cameras and immediately shared the confrontation Bundy manufactured on social media.

81. St. Luke's security guards recognized Bundy, based on his actions and direction of the crowd, as “the catalyst and aggressor in the group.”

82. Hospital staff explained to Bundy and his followers that the group was blocking emergency access to the ambulance bay and asked them to move to a nearby area where they would not block patient access. Following Bundy's lead, the group refused to move and continued to harass hospital staff.

83. Hospital staff told Bundy and his followers that they would be trespassing if they stayed in the ambulance bay. Once again, the group refused to leave.

84. Recognizing that Bundy's followers were growing more numerous and menacing, a hospital supervisor tried to reason with Bundy and deescalate the situation. For the benefit of those there to film him, Bundy responded by accusing the supervisor of kidnapping and then demanded that he give Bundy the Infant. Bundy knew full well he had no legal authority to make that demand because he had no parental rights over the Infant and because the Infant had been taken into protective custody pursuant to Idaho law.

85. Bundy knew that St. Luke's would not and could not as a matter of law release the Infant into Bundy's custody.

86. Hospital staff repeatedly warned Bundy and his followers to clear the ambulance bay. Bundy heard and refused to heed the warnings on at least three occasions.

87. Bundy knew the police had no option but to arrest him for trespass. As Bundy intended, the police arrested him just before 2:00 a.m. on March 12, 2022. Bundy was on the way to getting the publicity he craved.

88. Bundy's followers recorded his arrest for social media and then dispersed.

89. The police released Bundy a few hours after his trespass.

90. Upon his release, Bundy immediately began to publicize his arrest. In accordance with the messaging campaign developed by Rodriguez (a paid marketing consultant for the Bundy Campaign), Bundy mischaracterized the Infant as having been in good health, falsely stated the Infant had been kidnapped from his parents because a single appointment was missed, indicated the Infant's health was at risk in the hospital, falsely stated that he had been arrested for trespass without warning and justification, and directed his followers to the freedomman.org website which already contained messaging supporting the false kidnapping and child trafficking narrative.

91. Shortly thereafter, the Bundy Campaign and PRN likewise began to publish the same false narrative regarding the Infant's care at St. Luke's and regarding Bundy's arrest at St. Luke's in Meridian.

### **Concerted Effort to Disrupt St. Luke's Business**

92. To further their false narrative, Defendants made false statements regarding the Infants' care and repeatedly defamed the St. Luke's Parties. In addition, Defendants repeatedly told their followers that the St. Luke's Parties need to be punished and directed their followers on how to shame the St. Luke's Parties and disrupt St. Luke's operations. Defendants intended to incite or acted recklessly to incite followers and the public to threaten violence and to commit violence against the St. Luke's Parties. In particular, Bundy knew he had cultivated a personal following that was conditioned to see him as a leader and quasi-religious figure and that his participation in and endorsement of this false narrative would inspire threats of violence and likely real violence against the St. Luke's Parties by his followers.

93. Defendants incited their followers by publishing patently untrue statements and providing direction to cause harm, including falsely stating the following:

- a. St. Luke's Parties were participating in a conspiracy to kidnap, traffic, sexually abuse, and kill children;
- b. St. Luke's Parties were running a child trafficking ring in order to profit from tax dollars;
- c. St. Luke's Parties were abusing and harming the Infant in irreparable ways;
- d. St. Luke's Parties harmed and killed babies all the time;
- e. St. Luke's Parties kidnapped the Infant and other children;
- f. St. Luke's Parties were "moronic imbeciles" who neglected the Infant;
- g. St. Luke's Parties stole the Infant;

- h. St. Luke's changed the Infant into someone who was unrecognizable, lethargic, and unresponsive;
- i. St. Luke's failed to keep the Infant clean;
- j. St. Luke's caused the Infant "suspicious" bruising;
- k. St. Luke's lied about the Infant's treatment;
- l. St. Luke's Parties vaccinated the Infant against the family's wishes;
- m. St. Luke's Parties were "medically negligent";
- n. St. Luke's was "world famous" for "mistreating people," "killing people," and "stealing babies from their parents";
- o. St. Luke's forced the Infant to take "toxic poison" which was then allowed to stay in the Infant's body for days;
- p. St. Luke's Parties changed and falsified information in the medical records to protect themselves;
- q. Mr. Roth was guilty of criminal accessory of child abduction and deprivation of rights under color of law;
- r. Mr. Roth personally profited from the pandemic;
- s. Dr. Erickson was responsible for the Infant's kidnapping;
- t. Dr. Erickson participated in kidnapping "hundreds of children" with the help of a judge;
- u. The Infant "possibly could lose his life because of the decisions of people [at St. Luke's] who don't even care" about the Infant;
- v. The hospital made the Infant "more sickly";
- w. Followers should put "physical pressure" on those "that are causing the problem";
- x. Followers should disrupt St. Luke's operations by protesting, calling in, donating money, making noise, and giving the hospital "hell";
- y. God should "crush the necks of those that are evil."

94. Defendants caused disruption to St. Luke's operations, harmed staff and patients, and impaired patient care inside the hospital.

95. Between March 12 and March 17, 2022, Defendants Bundy, Rodriguez, PRN and the other Defendants called on their followers to protest at St. Luke's in Boise, to demand the return of the Infant, and to prevent transfer of the Infant from the hospital into foster care. In response, crowds, many of whom carried firearms, began to join Bundy and Rodriguez at the hospital in a concerted effort to disrupt the hospital's operations and intimidate hospital staff and patients.

96. Rodriguez became a daily presence at the hospital. Rodriguez conducted defamatory "press conferences" outside the St. Luke's Boise hospital.

97. Incited by Defendants, the crowd of followers harassed patients and staff, and disrupted patient care. Patients reported feeling anxious and fearful because of Defendants' noisy and menacing protests.

98. On March 15, 2022, Defendants went so far as to cause St. Luke's to go into lockdown for more than an hour. During this time, nurses, doctors, and other employees could not enter or exit the building. St. Luke's directed patients to other facilities and rerouted ambulances to other sites.

99. Defendants also organized a campaign of technological disruption. They encouraged their followers to flood St. Luke's phone lines and email inboxes in an effort to shut down St. Luke's operations. Defendants' followers jammed phone lines with menacing calls (including death threats), sent threatening emails, and sent spam emails to disrupt servers. Using his notoriety, Bundy repeatedly directed his followers to disrupt St. Luke's operations.

#### **Solicitations for Donations to Rodriguez's Family**

100. Concurrently while acting to harm the St. Luke's Parties, Rodriguez, with help from the other Defendants, solicited money based on false representations relating to the Infant,

the circumstances leading to DHW's intervention, the parents' financial condition, and the St. Luke's Parties.

101. A center piece in almost every one of Rodriguez's media appearances was a solicitation for donations to his family members, the parents of the Infant. Likewise, the solicitation for donations was advertised on peoplesrights.org and freedomman.org.

102. These solicitations for charitable contributions were made based on the defamatory statements about the St. Luke's Parties and others kidnapping, trafficking, and killing children.

103. The solicitations were also premised on false statements regarding the parents' liability for the medical care provided by SLHS, SLRMC, and Dr. Erickson. Rodriguez repeatedly stated that the St. Luke's Parties were performing unnecessary medical tests and treatments on the Infant, unnecessarily extending the Infant's time at the hospital to increase costs, and extorting the Infant's parents. These statements were false.

104. As Rodriguez knew or recklessly failed to learn, the parents did not have significant financial liability relating to the [REDACTED] care. While the Infant's [REDACTED] [REDACTED] and the parents were uninsured, governmental assistance and St. Luke's policies alleviated any significant financial burden.

105. While the Infant was [REDACTED], the Infant's parents were made aware that significant costs were being covered by government assistance. St. Luke's also took steps to assist the parents in minimizing the financial impact of the healthcare provided to the Infant. For example, when the Infant's parents expressed concerns about paying for the hospital stay during the Infant's first admission, a St. Luke's employee screened the family and informed them that they likely qualified for Medicaid assistance.

106. A patient care coordinator passed their concerns along to a patient financial advocate (PFA), and the PFA spoke with the Infant's mother on March 2, 2022, to discuss financial assistance options. The PFA screened the family for Medicaid and advised the Infant's mother that, given their reported family income, the Infant qualified for Children's Health Insurance Plan (CHIP) under Medicaid. The employee later tried to call the Infant's parents on March 3, 2022, and March 8, 2022, to offer further assistance, but the parents did not answer or return the calls.

107. Medicaid covered the Infant's medical bills for both ER visits and admissions. Despite absence of insurance, the Infant's family does not have any outstanding balance due to St. Luke's. The Infant's family never paid anything for and owe nothing for the care the Infant received at St. Luke's, including the care received during the hospital stay March 1-4, 2022 which was initiated by the Infant's parents.

108. Despite knowing that the Infant's parents had not incurred significant liability for the medical care received at SLRMC, Rodriguez, assisted by the other Defendants, continued to solicit donations, and received more than \$115,000 based on misrepresentations that the St. Luke's Parties had engaged in wrongdoing and that St. Luke's had created huge financial liability for Rodriguez's family.

#### **Defendants Used the False Narrative to Market PRN and Other Business Ventures**

109. Defendants used their false narrative regarding the Infant to market PRN.

110. Defendants repeatedly misrepresented that the Infant was released to the Infant's parents based on the fact that PRN had acted to disrupt the operations of the St. Luke's Parties and acted to intimidate and threaten the St. Luke's Parties.

111. Defendants made these false statements knowing that the Infant was released in accordance with the judicial proceedings, because St. Luke's was able to stabilize the Infant's medical condition, and because protections were put in place to protect the Infant's health going forward.

112. Defendants knew that PRN and the other Defendants did not assist with or accelerate the release of the Infant to the parents. Defendants knew that their actions had actually slowed and complicated the process of returning the Infant to the parents. Nevertheless, Bundy and Rodriguez and the other Defendants committed to selling the false narrative to grow membership in PRN and to make money off members who were directed to make payments to Rodriguez's Freedom Tabernacle entity and/or Bundy's Dono Custos entity.

113. In fact, even after the Infant was returned to the Infant's parents, Rodriguez and Bundy have continued to exploit the Infant by incessantly marketing the Infant and his likeness through social media and alternative media to promote PRN, Bundy in campaign advertising, and Rodriguez and his multiplicity of sales schemes.

#### **Defendants Continue to Defame and Call for Harassment**

114. Defendants' efforts to disrupt and dismantle St. Luke's and defame Plaintiffs did not stop when the Infant was discharged.

115. Seeking to continue to benefit politically and financially from the false conspiracy Defendants manufactured, Rodriguez recently created the group "People Against Child Trafficking."

116. On March 26, 2022, Bundy and Rodriguez organized a rally on property owned by one of Bundy's companies.



117. The rally was heavily advertised by Defendants and was exploited as a fundraising event by the Bundy Campaign.

118. During the March 26, 2022, rally, Defendants continued to make false, defamatory statements about the St. Luke's parties, including the following:

- a. Defendant Rodriguez stated Dr. Erickson kept the Infant in the hospital to "rack[] up the bill" while displaying defamatory images of Dr. Erickson on a large movie screen;
- b. Defendant Rodriguez stated the St. Luke's Parties engaged in kidnapping and child trafficking for money;
- c. Defendant Rodriguez indicated that the St. Luke's Parties were taking part in the "greatest child trafficking ring in the history of the world"; and
- d. Defendant Bundy described the St. Luke's Parties as equivalent to rapists, comparing the St. Luke's Parties to "feudal lords" practicing "prymae noctis";<sup>1</sup>

119. At the March 26, 2022, rally on the Bundy Property, Rodriguez bragged about shutting down St. Luke's phones system such that St. Luke's "couldn't even operate."

120. At the March 26, 2022, rally, Defendants used defamatory speech to incite people to join PRN and to take the fight against the St. Luke's Parties and other supposed kidnapers and child traffickers "all the way to the end."

121. The defamatory statements made at the March 26, 2022, rally were streamed and the video was later posted to social media sites and to websites controlled by Defendants.

122. Defendants continue to defame the St. Luke's Parties, including but not limited to publishing or making the following false, misleading, and defamatory statements.

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<sup>1</sup> Prymae Noctis names an ancient tradition in which all noble lords had the right to have sex with any female subject, regardless of her will, and even with a virgin bride on her wedding night. <https://www.dictionnary.com/e/historical-current-events/prymae-nocta/#:~:text=Prima%20nocta%20is%20the%20semi,particularly%20on%20her%20wedding%20night.>

123. Defendant Bundy falsely and publicly reaffirmed that all of his prior public statements about Plaintiffs were true.

124. Defendant Bundy falsely and publicly accused St. Luke's of taking the Infant.

125. Defendant Bundy falsely and publicly accused St. Luke's of taking other peoples' children.

126. Defendant Rodriguez falsely and publicly accused St. Luke's of being involved in a child trafficking network and kidnapping children.

127. Defendant Rodriguez falsely and publicly accused St. Luke's of profiting off of the false kidnapping of the Infant.

128. Defendant Rodriguez falsely stated in emails in support of a web site he is creating that St. Luke's is corrupt and wicked and is involved in extortion harming Idahoans every day.

129. Defendant Rodriguez falsely stated on a website of his creation that St. Luke's and its CEO Mr. Roth are corrupt, wicked, and commit extortion every day.

130. Defendant Rodriguez, Bundy, and PRN have repeatedly made the false statements that Plaintiffs participated in a conspiracy with DHW and Governor Little to kidnap and traffic the Infant in retaliation for Bundy's political opposition to government actions taken to mitigate the COVID-19 pandemic.

131. In a video that he produced and promoted widely on the internet on or about February 10, 2023, Bundy falsely stated that Dr. Erickson misdiagnosed the Infant and called CPS.

132. In a video that he produced and promoted widely on the internet on or about February 10, 2023, Bundy falsely stated that Chris Roth was an accessory to child abduction.

133. In a news article published in the Idaho Press on or about February 10, 2023, Bundy falsely stated that Dr. Erickson misdiagnosed the Infant.

134. In an interview on or about January 27, 2023, which was posted and promoted on the internet, Bundy falsely stated that St. Luke's misdiagnosed the Infant multiple times, three times while in the hospital's care.

135. On or about January 17, 2023, Bundy published "Come No More Upon Me, A Warning Letter from Ammon Bundy" ("Come No More Threat") on the PRN website and on other websites which contains a number of false statements, including, but not limited to, false statements that: (1) the Infant was taken into protective custody as part of a conspiracy involving St. Luke's and government officials which targeted Bundy; and (2) that he was forced to sell his home because St. Luke's put a lien on the property.

136. Further, Bundy and PRN updated the "Come No More Threat" numerous times between January 17, 2023 and February 10, 2023 to make additional threats and false statements, including, but not limited to: (1) that "the Senior Executives at St. Luke's are getting away with committing horrible crimes against children in Idaho . . ."; and (2) that St. Luke's negotiated with him regarding his criminal trespass.

137. Defendant Bundy made numerous false public statements that the Infant was neglected while in St. Luke's care. Among other places, Bundy made these false statements on or around February 9, 2023 on the internet video blog entitled "The Pete Santilli Show".

138. Defendant Rodriguez has repeatedly used hate speech directed at the LGBTQ+ community while making false statements in widely disseminated interviews that St. Luke's participates in a conspiracy to kidnap babies from Godly, Christian families in order to traffic the babies to "homos" who are likely to abuse or kill the stolen babies.

139. Defendant Rodriguez falsely stated St. Luke's is involved in child trafficking, and in any number of wicked and heinous offenses against society and people of faith, specifically.

**COUNT I  
(DEFAMATION (LIBEL AND SLANDER)—  
ALL PLAINTIFFS AGAINST ALL DEFENDANTS)**

140. Plaintiffs incorporate the foregoing allegations as if fully set forth herein.

141. Defendants have published false, misleading, and defamatory statements about Plaintiffs directed to third parties including, but not limited to:

- a. Defendant Rodriguez falsely and publicly accused St. Luke's of being "world famous" for "mistreating people," "killing people," and "stealing babies from their parents."
- b. Defendant Rodriguez falsely and publicly accused St. Luke's of forcing the Infant to take "toxic poison."
- c. Defendant Rodriguez falsely and publicly accused Plaintiffs of participating in an "organized crime ring" and "harming" the Infant.
- d. Defendants falsely and publicly accused Plaintiffs of kidnapping children.
- e. Defendants repeatedly told their followers and supporters to disrupt St. Luke's operations by protesting, calling in, donating money, and making noise. Followers heeded these commands, resulting in serious threats to Plaintiffs.
- f. Defendant PRN published a wanted poster featuring a headshot of Mr. Roth with the caption: "WANTED: Chris Roth, President/CEO of St. Luke's." Under the headshot, the website falsely accused Mr. Roth of "Criminal accessory of child abduction and deprivation of rights under color of law." Defendants encouraged protestors to make signs using this image.
- g. Defendant FMP published a list of pictures under the heading: "Main People Responsible for [REDACTED] Kidnapping." Dr. Erickson's picture was the first on the list. FMP then falsely stated that Dr. Erickson "was the first to call CPS" and accused her of being "the initial trigger that got everything started." FMP later added NP Jungman to the list.
- h. Defendant Rodriguez falsely and publicly stated that Dr. Erickson "had a panic attack and literally sent a CPS worker or social worker to [Rodriguez's] daughter's hospital room to interview her."

- i. Defendant Rodriguez falsely and publicly stated that Dr. Erickson is incompetent at her profession, stating the “hospital doesn’t understand even the basic common-sense things that anybody understands.”
- j. Defendants FMP and Rodriguez published the false statement that experts at St. Luke’s “harm and kill babies all the time.” This false accusation is intended to defame doctors at St. Luke’s including Dr. Erickson.
- k. Defendant Bundy falsely and publicly accused Judge Fortier of taking “hundreds of children . . . with this Doctor Natasha D. Erickson.”
- l. Defendants FMP and Rodriguez published the false statements that NP Jungman “personally financially benefitted from this Child trafficking” and that she “takes innocent little children that have just been ripped from their families and starts looking at and asking them about their privates.”
- m. Defendants FMP and Rodriguez published a false statement implying that NP Jungman committed “medical malpractice.”
- n. Defendant Rodriguez falsely stated that St. Luke’s was involved in kidnapping the Infant for a profit.
- o. Defendant Rodriguez stated that St. Luke’s is connected to a medical mafia.
- p. Defendant Bundy falsely stated that Dr. Erickson misdiagnosed the Infant.
- q. Defendant Bundy falsely stated that Chris Roth and Dr. Erickson are the ones who took the Infant from his parents.
- r. Defendant Bundy falsely stated that St. Luke’s misdiagnosed the Infant multiple times.
- s. Defendant Bundy falsely states that St. Luke’s mistreated and neglected the Infant while the Infant was in their care.
- t. Defendant Bundy falsely stated that St. Luke’s targeted the Infant for kidnapping because of Bundy’s opposition to COVID “corruption”.
- u. Defendant Rodriguez falsely stated St. Luke’s is involved in child trafficking, and in any number of wicked and heinous offenses against people of faith, specifically.

142. These statements were false.

143. At the time Defendants made the statements, they knew the statements were false, or made the statements with reckless disregard for their truth and made such statements with malice.

144. Defendants' statements were not subject to privilege or justified communications.

145. Defendants made or published the statements with the purpose of defaming or disparaging Plaintiffs, in an effort to injure Plaintiffs' business and reputation.

146. Defendants make these false statements in an effort to benefit themselves financially.

147. Defendants' statements involve false allegations of criminal activity and/or involve matters incompatible with business, trade, profession, or office, and are defamatory *per se*.

148. In particular, Defendant Bundy made false statements directed at Dr. Erickson which involve matters incompatible with business, trade, profession, or office, and are defamatory *per se*.

149. Defendants made false statements that Plaintiffs were committing crimes and wrongful acts against Christians or people of faith intending that those false statements would increase the likelihood of their followers or other members of the public would harass and/or commit violence against Plaintiffs.

150. Defendants Rodriguez and Defendant FMP used hate speech directed at the LGBTQ+ community in their false statements against Plaintiffs intending that those false statements would increase the likelihood that their followers or other members of the public would harass and/or commit violence against Plaintiffs.

151. As a direct and proximate result of Defendants' publication of such statements, Plaintiffs have suffered economic and non-economic harm in an amount to be proven at trial.

152. Because Defendants' statements were made knowingly, intentionally, willfully, and/or maliciously, Plaintiffs seek punitive damages in an amount to be proven at trial.

**COUNT II  
(INVASION OF PRIVACY—MR. ROTH, DR. ERICKSON, AND NP JUNGMAN  
AGAINST ALL DEFENDANTS)**

153. Plaintiffs Mr. Roth, Dr. Erickson, and NP Jungman incorporate the foregoing allegations as if fully set forth herein.

154. Through their actions described above, Defendants have published materially false statements concerning Mr. Roth, Dr. Erickson, and NP Jungman to third parties.

155. These statements were false.

156. These statements placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye.

157. At the time Defendants made the statements, they knew the statements were false, or made the statements with reckless disregard for their truth and made such statements with malice.

158. Defendants' statements were not subject to privilege or justified communications.

159. As a direct and proximate result of Defendants' publication of such statements, Mr. Roth, Dr. Erickson, and NP Jungman have suffered damages in an amount to be proven at trial.

160. Because Defendants' actions were done knowingly, intentionally, willfully, and/or maliciously, Mr. Roth, Dr. Erickson, and NP Jungman seek punitive damages in an amount to be proven at trial.

**COUNT III**  
**(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS—**  
**MR. ROTH, DR. ERICKSON, AND NP JUNGMAN AGAINST ALL DEFENDANTS)**

161. Plaintiffs Mr. Roth, Dr. Erickson, and NP Jungman incorporate the foregoing allegations as if fully set forth herein.

162. Through their actions described above, Defendants engaged in extreme and outrageous conduct that went beyond all possible bounds of decency in a civilized society.

163. Defendants' conduct was intentional or reckless.

164. As an actual or proximate result of Defendants' wrongful conduct, Mr. Roth, Dr. Erickson, and NP Jungman suffered the requisite injuries.

165. As a direct and proximate result of Defendants' wrongful conduct, Mr. Roth, Dr. Erickson, and NP Jungman have suffered damages in an amount to be proven at trial.

166. Because Defendants' actions were done knowingly, intentionally, willfully, and/or maliciously, Mr. Roth, Dr. Erickson, and NP Jungman seek punitive damages in an amount to be proven at trial.

**COUNT IV**  
**(TRESPASS-SLHS AND SLMRC AGAINST BUNDY AND RODRIGUEZ)**  
**(COMMON LAW)**

167. Plaintiffs SLHS and SLRMC incorporate the foregoing allegations as if set forth fully herein.

168. Defendant Bundy entered the ambulance bay at St. Luke's Meridian property on Saturday, March 12, 2022.

169. Defendant Bundy did not have permission to be in the ambulance bay at St. Luke's Meridian property.

170. Defendant Bundy remained in the ambulance bay at St. Luke's Meridian property after being instructed to leave and blocked access to the ambulance bay.



171. The ambulance bay at St. Luke's Meridian property is restricted to authorized medical and emergency personnel.

172. Defendant Bundy's presence in the ambulance bay at St. Luke's Meridian property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

173. Defendants Bundy and Rodriguez entered St. Luke's Boise property on Tuesday, March 15, 2022, while leading a large crowd for the express purposes of disrupting hospital operations and generating publicity for a political cause that benefited Defendants and generating revenue for Defendants.

174. Defendants Bundy and Rodriguez did not have permission to enter or remain on St. Luke's Boise property because they were not seeking medical care or treatment and were not authorized visitors.

175. Defendants Bundy and Rodriguez interfered with hospital staff, blocked public access to the hospital, and disrupted hospital operations.

176. Defendants Bundy's and Rodriguez's presence at St. Luke's Boise property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

177. As a direct and proximate result of Defendants Bundy's and Rodriguez's actions, Plaintiff St. Luke's has suffered damages in an amount to be proven at trial.

**COUNT V**  
**(TRESPASS-SLHS AND SLRMC AGAINST BUNDY AND RODRIGUEZ)**  
**(STATUTORY TRESPASS PURSUANT TO I.C. § 6-202)**

178. Plaintiffs SLHS and SLRMC incorporate the foregoing allegations as if set forth fully herein.

179. Defendant Bundy entered the ambulance bay at St. Luke's Meridian property on Saturday, March 12, 2022.

180. Defendant Bundy did not have permission to be in the ambulance bay at St. Luke's Meridian property.

181. Defendant Bundy acted intentionally and willfully when he entered and remained in the ambulance bay at St. Luke's Meridian property.

182. Defendant Bundy remained in the ambulance bay at St. Luke's Meridian property after being instructed to leave and blocked access to the ambulance bay.

183. The ambulance bay at St. Luke's Meridian property is not open to the public and is not accessible by the public. Entry into the ambulance bay is restricted to authorized medical personnel, emergency responders, and patients seeking emergency care.

184. Defendant Bundy's presence in the ambulance bay at St. Luke's Meridian property interfered with St. Luke's ability to provide medical care to patients and conduct its business. Bundy took this action for an improper purpose.

185. Defendants Bundy and Rodriguez entered St. Luke's Boise property on Tuesday, March 15, 2022, as protestors. Bundy and Rodriguez took these actions for improper purposes.

186. Defendants Bundy and Rodriguez acted intentionally and willfully when they entered and remained present at St. Luke's Boise property.

187. St. Luke's Boise property is open to the public who are actively seeking medical care or treatment. St. Luke's lawfully restricts access to its Boise property to patients and authorized visitors only.

188. Defendants Bundy and Rodriguez did not have permission to enter or remain on St. Luke's Boise property because they were not seeking medical care or treatment and were not authorized visitors.

189. Defendants Bundy and Rodriguez interfered with hospital staff and patients, blocked public access to the hospital, and disrupted hospital operations.

190. Defendants Bundy's and Rodriguez's presence at St. Luke's Boise property interfered with St. Luke's ability to provide medical care to patients and conduct its business.

191. As a direct and proximate result of Defendants Bundy's and Rodriguez's actions, Plaintiff St. Luke's has suffered damages in an amount to be proven at trial and should be awarded attorneys' fees relating to this claim and pursuant to I.C. § 6-202(3)(a)(ii) (civil trespass). In the event of default, SLHS and SLRMC each should be awarded damages for this cause of action in an amount of no less than \$250,000 from each Defendant, Bundy and Rodriguez, and in addition, in the amount of \$50,000 in attorneys' fees relating to this claim from Bundy and Rodriguez.

**COUNT VI**  
**(UNFAIR BUSINESS PRACTICES—ALL PLAINTIFFS AGAINST DEFENDANTS**  
**BUNDY, RODRIGUEZ, AND FMP)**

192. Plaintiffs incorporate by reference each of the foregoing allegations as if set forth fully herein.

193. Defendants engage in political activism, the marketing of the personal brands of Bundy and Rodriguez, and related business activities for financial gain.

194. Ammon Bundy is in the business of generating revenue for himself, his political campaign, the PRN, and other businesses he owns, such as Abish-husbandi, Inc. and Dono Custos, Inc, by marketing his personal brand as a political activist and leader to garner donations, revenues, and fees.

195. Rodriguez generates revenue for himself and his businesses through his personal brand, his political activism, the FM PAC, FMP, sale of his self-published books, speaking engagements, provision of marketing services to the Bundy for Governor Campaign, and through

his consulting services sold through the Power Marketing entities. For example, Rodriguez exploits the likeness of the Infant and the notoriety created by the false narrative regarding the Infant to advertise Power Marketing.

196. FMP owns and operates freedomman.org. FMP generates revenue and/or other benefits for Rodriguez through traffic to the site and by serving as a marketing vehicle for Rodriguez's business ventures, including, but not limited to, Freedom Tabernacle Incorporated and the Power Marketing entities.

197. SLHS and SLRMC are not-for-profit companies which provide medical services in Idaho.

198. Mr. Roth is the CEO and President of SLHS.

199. Dr. Erickson is a physician employed by SLRMC.

200. NP Jungman is a nurse practitioner employed by SLRMC.

201. In the conduct of trade or commerce and in seeking revenue for themselves, Bundy, Rodriguez, and FMP engaged in methods, acts, and practices unlawful under Idaho Code title 48, chapter 6, including, but not limited to, falsely disparaging the business and professional reputation of the St. Luke's Parties.

202. Bundy, Rodriguez, and FMP knew, or in the exercise of due care should have known, that they engaged in unconscionable methods, acts, or practices in the conduct of trade or commerce, as provided in Idaho Code § 48-603C.

203. The actions and practices of Bundy, Rodriguez, and FMP are misleading, false, or deceptive.

204. Bundy's, Rodriguez's, and FMP's conduct and pattern of conduct are outrageous and offensive to the public conscience.

205. As a direct result of these wrongful acts and practices, the St. Luke's Parties have been damaged more than \$250,000.00, in an amount to be proven at trial.

**COUNT VII  
(IDAHO CHARITABLE SOLICITATION ACT—ALL PLAINTIFFS AGAINST  
DEFENDANTS RODRIGUEZ AND FMP)**

206. Plaintiffs incorporate by reference each of the foregoing allegations as if set forth fully herein.

207. Defendants Rodriguez and FMP engaged in the solicitation of charitable contributions to the "Save [REDACTED] from Medical Kidnapping" campaign.

[https://givesendgo.com/\[REDACTED\]](https://givesendgo.com/[REDACTED])

208. Defendants Rodriguez and FMP solicited charitable contributions based on false statements regarding supposed medical bills owed to SLHS and SLRMC. In truth, the parents of the Infant never made any payments to SLHS or SLRMC for medical services and owe no money to SLHS or SLRMC for medical services as the medical services were covered by government programs.

209. Defendant Rodriguez and FMP planned, conducted, and executed solicitations for charitable contributions by utilizing unfair, false, deceptive, misleading, or unconscionable acts and practices.

210. In soliciting for charitable contributions, Rodriguez and FMP engaged in methods, acts, and practices unlawful under Idaho Code title 48, chapter 12, including, but not limited to, falsely disparaging the business and professional reputation of the St. Luke's Parties, manufacturing a false conspiracy of kidnapping, trafficking, and killing of children involving the St. Luke's Parties, and falsely representing the amount of liability incurred relating to medical expenses associated with treatment of the Infant.

211. SLHS and SLRMC are not-for-profit companies which provide medical services in Idaho that were disparaged as part of the charitable solicitation.

212. Mr. Roth is the CEO and President of SLHS who was disparaged and part of the charitable solicitation.

213. Dr. Erickson is a physician employed by SLRMC who was disparaged as part of the charitable solicitation.

214. NP Jungman is a nurse practitioner employed by SLRMC who was disparaged as part of the charitable solicitation.

215. Rodriguez and FMP knew, or in the exercise of due care should have known, that they engaged in unconscionable methods, acts, or practices in the conduct of trade or commerce, as provided in Idaho Code § 48-603C, standards incorporated into the Idaho Charitable Solicitations Act.

216. The actions and practices of Rodriguez and FMP relating to the solicitation of the charitable contributions were and continue to be misleading, false, or deceptive.

217. Rodriguez's and FMP's conduct and pattern of conduct are outrageous and offensive to the public conscience.

218. As a direct result of these wrongful acts, Rodriguez and FMP caused more than \$115,000 to be donated wrongfully.

219. As a direct result of these wrongful acts and practices, the St. Luke's Parties have been damaged owing to the false and defamatory statements to generate donations.

220. As a direct result of these wrongful acts and practices, the public has been misled.

221. Rodriguez and FMP should be assessed damages and attorneys' fees (pursuant to I.C. §§ 48-608, 48-1205), in an amount proven at trial pursuant to the purpose of the Idaho

Charitable Solicitations Act. In the event of default, Rodriguez and FMP should be forced to disgorge at least \$115,000 and pay attorneys' fees in the amount of \$50,000 to Plaintiffs for fees incurred relating to this claim.

**COUNT VIII  
(CIVIL CONSPIRACY TO COMMIT DEFAMATION, INVASION OF PRIVACY,  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, TRESPASS, UNFAIR  
BUSINESS PRACTICES, AND WRONGFUL CHARITABLE SOLICITATIONS—ALL  
PLAINTIFFS AGAINST DEFENDANTS)**

222. Plaintiffs incorporate the foregoing allegations as if fully set forth herein.

223. Defendants each willfully, intentionally, and knowingly agreed and conspired with each other to publish false, misleading, and defamatory statements about Plaintiffs directed to third parties, as described above.

224. Defendants Rodriguez and Bundy further agreed and conspired to unlawfully trespass on Plaintiff St. Luke's property.

225. In furtherance of this conspiracy, Defendants defamed all Plaintiffs, invaded the privacy of Mr. Roth, Dr. Erickson, and NP Jungman, intentionally inflicted emotional distress on Mr. Roth, Dr. Erickson, and NP Jungman, unlawfully trespassed onto Plaintiff St. Luke's property, committed unfair trade practices against all Plaintiffs, and defamed all Plaintiffs in furtherance of a conspiracy to violate the Idaho Charitable Solicitation Act.

226. As a direct and proximate cause of Defendants' wrongful conduct, Plaintiffs have suffered damages in an amount to be proven at trial.

227. By virtue of the formation and operation of this conspiracy, Defendants, as participants in the conspiracy, are liable as joint tortfeasors for each other's misconduct.

**REQUEST FOR JURY TRIAL**

Pursuant to Idaho Rule of Civil Procedure 38, Plaintiffs hereby request trial by jury as to all issues that are properly so tried.

## **PRAYER FOR RELIEF**

Counterclaimants respectfully request the following relief from this Court:

- A. An award to each of the St. Luke's Parties from each of the Defendants for damages in the sum to be proven at trial but in no event less than \$250,000;
- B. Injunctive relief requiring the Defendants: (1) to cease posting and disseminating defamatory statements against the St. Luke's Parties; (2) to cease making statements that the St. Luke's Parties are criminals and/or participate in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children; (3) to remove from all online locations Defendants have authority to do so any and all statements that the St. Luke's Parties are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children; (4) to cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman; and (5) to remove from all online locations Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
- C. An award to the St. Luke's Parties of their reasonable attorneys' fees and costs for this matter under Idaho Code §§ 12-120(3), 12-121, 6-202(3)(a)(ii) (civil trespass), 48-608 (unfair business practices), and 48-1205 (Charitable Solicitation Act), or other applicable authorities and statutes;
- D. An award of punitive damages in the sum to be proven at trial; and
- E. Provide such other relief as the Court determines fair, just, and appropriate under the circumstances.



DATED this 3rd day of March, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of March, 2023, I caused to be filed and served, via iCourt, 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 Via Process Server  
 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 Via Process Server  
 Overnight Mail  
 Email/iCourt/eServe:

Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

U.S. Mail  
 Hand Delivered Via Process Server  
 Overnight Mail  
 Email/iCourt/eServe:

People’s Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

U.S. Mail  
 Hand Delivered Via Process Server  
 Overnight Mail  
 Email/iCourt/eServe:

People’s Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

U.S. Mail  
 Hand Delivered Via Process Server  
 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](mailto:freedommanpress@protonmail.com)

*/s/Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

21008987\_v1

# **EXHIBIT B**

### Case Information

CV01-22-06789 | St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman Plaintiff, vs. Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man FAC, Peoples Rights Network, Freedom Man Press LLC Defendant.

Case Number  
CV01-22-06789  
File Date  
05/11/2022

Court  
Ada County District Court  
Case Type  
AA- All Initial District Court Filings  
(Not E, F, and H1)

Judicial Officer  
Norton, Lynn G.  
Case Status  
Active - Pending

### Party

Plaintiff  
St Lukes Health System LTD

Active Attorneys ▾  
Lead Attorney  
Stidham, Erik F.  
Retained

Plaintiff  
St Lukes Regional Medical Center LTD

Active Attorneys ▾  
Lead Attorney  
Stidham, Erik F.  
Retained

Plaintiff  
Roth, Chris

Active Attorneys ▾  
Lead Attorney  
Stidham, Erik F.  
Retained

**Plaintiff**  
Erickson, Natasha D, MD

Active Attorneys ▼  
Lead Attorney  
Stidham, Erik F.  
Retained

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**Plaintiff**  
Jungman, Tracy W

Active Attorneys ▼  
Lead Attorney  
Stidham, Erik F.  
Retained

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**Defendant**  
Bundy, Ammon

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**Defendant**  
Ammon Bundy for Governor

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**Defendant**  
Rodriguez, Diego

Active Attorneys ▼  
Pro Se

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**Defendant**  
Freedom Man PAC

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**Defendant**  
Peoples Rights Network

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**Defendant**  
Freedom Man Press LLC

## Bond Settings

Setting Date

4/18/2023

## Events and Hearings

05/11/2022 New Case - District Civil
05/11/2022 Civil Case Information Sheet
05/11/2022 Civil Case Information Sheet
05/11/2022 Complaint Filed ▾  Comment and Demand for Jury Trial (Redacted)
05/11/2022 Summons Issued ▾  Comment and Filed - Ammon Bundy
05/11/2022 Summons Issued ▾  Comment and Filed - Ammon Bundy for Governor
05/11/2022 Summons Issued ▾  Comment and Filed - Diego Rodriguez
05/11/2022 Summons Issued ▾  Comment and Filed - Freedom Man Press LLC

05/11/2022 Summons Issued ▼  Comment and Filed - Freedom Man PAC
05/11/2022 Summons Issued ▼  Comment and Filed - People's Rights Network
05/11/2022 Motion ▼  Comment to Seal
05/11/2022 Memorandum In Support of Motion ▼  Comment to Seal
05/11/2022 Motion ▼  Comment for Protective Order
05/11/2022 Memorandum In Support of Motion ▼  Comment for Protective Order
05/11/2022 Motion ▼  Comment for a Preliminary Injunction
05/11/2022 Declaration ▼  Comment of Dr. Natasha Erickson in Support of Motion for a Preliminary Injunction (Redacted)
05/11/2022 Declaration ▼  Comment of Chris Roth in Support of Motion for a Preliminary Injunction
05/11/2022 Declaration ▼  Comment of Erik Stidham in Support of Motion for a Preliminary Injunction (Redacted)



05/11/2022 Memorandum In Support of Motion ▾

Comment

for a Preliminary Injunction Against Ammon Bundy, Diego Rodriguez, Freedom Man Press LLC and People's Rights Network (Redacted)

05/11/2022 Summons ▾

Served

05/12/2022

05/11/2022 Summons ▾

Served

05/13/2022

05/11/2022 Summons ▾

Served

07/15/2022

05/11/2022 Summons ▾

Served

05/12/2022

05/12/2022 Declaration ▾

Comment

of David Barton in Support of Motion for a Preliminary Injunction (Redacted)

05/12/2022 Motion ▾

Comment

to Seal Memorandum in Support of Motion to Expedite Discovery

05/12/2022 Memorandum In Support of Motion ▾

Comment

to Seal Memorandum in Support of Motion to Expedite Discovery

05/12/2022 Motion ▾

Comment

to Expedite Discovery

05/12/2022 Memorandum In Support of Motion ▾

Comment  
to Expedite Discovery (Redacted)

05/12/2022 Declaration in Support of Motion ▼

Comment  
Declaration of Erik Stidham In Support of Motion to Expedite Discovery

05/17/2022 Affidavit / Return of Service ▼

Comment  
(Ammon Bundy for Governor) 5/13/22

05/17/2022 Affidavit / Return of Service ▼

Comment  
(People's Rights Network) 5/12/22

05/17/2022 Affidavit / Return of Service ▼

Comment  
(Ammon Bundy) 5/12/22

05/28/2022 Notice of Hearing ▼

Comment  
(June 3, 2022 at 9:00 am) Motion to Seal, Motion to Expedite Discovery

06/02/2022 Amended Complaint Filed ▼

Comment  
and Demand for Jury Trial (Redacted)

06/02/2022 Motion ▼

Comment  
to Seal

06/02/2022 Memorandum In Support of Motion ▼

Comment  
to Seal

06/03/2022 Motion Hearing ▼

Original Type  
Motion Hearing

Judicial Officer  
Norton, Lynn G.

## Hearing Time

9:00 AM

## Result

Hearing Held

## Comment

Motion to Seal, Motion to Expedite Discovery

## 06/03/2022 Order ▼

## Comment

Granting Motion to Expedite Discovery

## 06/03/2022 Court Minutes ▼

## Judicial Officer

Norton, Lynn G.

## 06/03/2022 Memorandum ▼

## Comment

Decision and Order Granting in Part Motions to Seal

## 06/03/2022 Motion for Service of Summons by Publication

## 06/17/2022 Declaration ▼

## Comment

of William T Teninty - Freedom Man Pac

## 06/17/2022 Declaration ▼

## Comment

of William T Teninty - Freedom Man Press

## 06/20/2022 Amended Summons Issued ▼

## Comment

and Served- People's Rights Network

## 06/20/2022 Amended Summons Issued ▼

## Comment

and Filed - Ammon Bundy

## 06/20/2022 Amended Summons Issued ▼

## Comment

and Filed - Ammon Bundy for Governor

## 06/24/2022 Motion ▼

<p>Comment for Sanctions</p>
<p>06/24/2022 Memorandum In Support of Motion ▼</p> <p>Comment for Sanctions</p>
<p>06/24/2022 Declaration in Support of Motion ▼</p> <p>Comment for Sanctions</p>
<p>06/27/2022 Civil Notice of Hearing ▼</p> <p>Comment (07/12/2022 @ 2:30 PM) Motion for Sanctions</p>
<p>06/28/2022 Amended Notice of Hearing ▼</p> <p>Comment (07/12/2022 @ 2:30 PM) Motion for Sanctions</p>
<p>07/06/2022 Motion ▼</p> <p>Comment for Entry of Default as to Freedom Man Press LLC and Freedom Man PAC</p>
<p>07/06/2022 Declaration ▼</p> <p>Comment of Erik F. Stidham in Support of Motion for Entry of Default as to Freedom Man Press LLC and Freedom Man PAC</p>
<p>07/08/2022 Affidavit in Support of Motion ▼</p> <p>Comment Supplemental Affidavit for Service by Publication with Supporting Documents</p>
<p>07/12/2022 Motion for Sanctions ▼</p> <p>Original Type Motion for Sanctions</p> <p>Judicial Officer Norton, Lynn G.</p> <p>Hearing Time 2:30 PM</p> <p>Result Hearing Held</p>

07/12/2022 Court Minutes ▼  Judicial Officer Norton, Lynn G.
07/12/2022 Amended ▼  Comment Order Granting Motion to Expedite Discovery
07/13/2022 Order for Service (Publication) ▼  Judicial Officer Norton, Lynn G.
07/13/2022 Summons Issued ▼  Comment and Filed - by Publication (Diego Rodriguez)
07/13/2022 Summons Issued ▼  Comment and Filed - by Publication (Freedom Man Press LLC)
07/13/2022 Summons Issued ▼  Comment and Filed - by Publication (Freedom Man Pac)
07/13/2022 Order ▼  Comment Denying Motion for Default & Default Judgment Against Freedom Man PAC & Freedom Man LLC
07/13/2022 Order ▼  Comment Denying Motion for Sanctions
07/13/2022 Amended Summons Issued ▼  Comment Second Amended Summons Issued and Filed - People's Rights Network
07/13/2022 Amended Summons Issued ▼  Comment Amended Summons Issued and Filed - Freedom Man PAC

07/13/2022 Amended Summons Issued ▼  Comment and Filed - Freedom Man PAC
07/13/2022 Amended Summons Issued ▼  Comment and Filed - Freedom Man Press
07/13/2022 Amended Summons Issued ▼  Comment Second Amended Summons Issued and Filed - Ammon Bundy
07/13/2022 Amended Summons Issued ▼  Comment Second Amended Summons Issued and Filed - Ammon Bundy for Governor
07/13/2022 Amended Summons Issued ▼  Comment Second Amended Summons Issued and Filed - People's Rights Network
07/13/2022 Summons ▼  Served 08/07/2022
07/13/2022 Summons ▼  Served 08/07/2022
07/13/2022 Summons ▼  Served 07/16/2022
07/13/2022 Summons ▼  Served 07/16/2022
07/13/2022 Summons ▼  Served 07/16/2022

07/22/2022 Affidavit / Return of Service ▼  Comment Diego Rodriguez - 07/15/2022
07/22/2022 Affidavit / Return of Service ▼  Comment Diego Rodriguez - 7/15/22
07/22/2022 Affidavit / Return of Service ▼  Comment Freedom Man PAC 7/15/22
07/22/2022 Affidavit / Return of Service ▼  Comment Freedom Man PAC 7/15/22
07/22/2022 Affidavit / Return of Service ▼  Comment on Freedom Man Press LLC 7/15/22
07/22/2022 Affidavit / Return of Service ▼  Comment on Freedom Man Press LLC 7/15/22
07/22/2022 Affidavit / Return of Service ▼  Comment Ammon Bundy - 07/16/2022
07/22/2022 Affidavit / Return of Service ▼  Comment Ammon Bundy for Governor - 07/16/2022
07/22/2022 Affidavit / Return of Service ▼  Comment People's Rights Network - 07/16/2022
07/22/2022 Affidavit / Return of Service ▼  Comment Ammon Bundy for Governor - Campaign Office - 07/20/2022

07/22/2022 Affidavit ▼  Comment of Non Service of Diego Rodriguez
07/26/2022 Affidavit / Return of Service ▼  Comment Ammon E. Bundy - 7/20/22
07/26/2022 Affidavit / Return of Service ▼  Comment Bundy for Governor - 7/20/22
07/26/2022 Affidavit / Return of Service ▼  Comment People's Rights Network - 7/20/22
08/12/2022 Motion for Entry of Default ▼  Comment and Default Judgment as to Bundy, Bundy for Governor and Peoples Rights
08/12/2022 Motion for Contempt ▼  Comment and Motion for Sanctions
08/12/2022 Memorandum In Support of Motion ▼  Comment for Sanctions and for Contempt
08/12/2022 Declaration in Support of Motion ▼  Comment of Attorney Stidham in Support of Motion for Entry of Default and default Judgment
08/12/2022 Civil Notice of Hearing ▼  Comment September 6 2022 at 4:00 pm
08/19/2022 Proof of Publication ▼  Comment Freedom Man PAC 8/07/22



08/19/2022 Proof of Publication ▼  Comment Freedom Man Press LLC 8/07/22
08/19/2022 Proof of Publication ▼  Comment Diego Rodriguez 8/07/22
08/19/2022 Proof of Publication ▼  Comment Freedom Man PAC 8/17/22
08/19/2022 Proof of Publication ▼  Comment Freedom Man Press 08/17/22
08/19/2022 Proof of Publication ▼  Comment Diego Rodriguez 08/17/22
08/19/2022 Proof of Publication ▼  Comment Freedom Man PAC 8/8/22
08/19/2022 Proof of Publication ▼  Comment Freedom Man Press LLC - 8/8/22
08/19/2022 Proof of Publication ▼  Comment Diego Rodriguez 8/8/22
08/19/2022 Motion for Contempt ▼  Comment and Motion for Sanctions (Diego Rodriguez)
08/19/2022 Memorandum In Support of Motion ▼  Comment for Sanctions (Diego Rodriguez)

08/19/2022 Declaration in Support of Motion ▼

Comment

of Attorney Stidham in Support of Motion for Sanctions and For Contempt (Diego Rodriguez)

08/19/2022 Civil Notice of Hearing ▼

Comment

September 6 2022 at 4:00 pm Motion for Sanctions and for Contempt (Diego Rodriguez)

08/24/2022 Order on Application for Default Judgment, Non Compliance

08/24/2022 Declaration in Support of Motion ▼

Comment

Supplemental Declaration of Erik F. Stidham in Support of Motion for Entry of Default and Default Judgment as to Ammon Bundy, Ammon Bundy for Governor, and People's Right Network

08/26/2022 Amended ▼

Comment

Amended Motion for Entry of Default as to Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network

08/26/2022 Declaration in Support of Motion ▼

Comment

for Entry of Default as to Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network

09/02/2022 Order for Entry of Default ▼

Comment

Against Ammon Bundy, Ammon Bundy for Governor, and Peoples Rights Network

09/06/2022 Motion for Sanctions ▼

Original Type

Motion for Sanctions

Judicial Officer

Norton, Lynn G.

Hearing Time

4:00 PM

Result

Hearing Held

Comment

Motion for Contempt

09/06/2022 Court Minutes ▼

Judicial Officer  
Norton, Lynn G.

09/06/2022 Answer ▼

Comment  
(Pro Se Defendant Rodriguez)

09/06/2022 Notice of Appearance ▼

Comment  
(Pro Se Defendant Rodriguez)

09/07/2022 Civil Case Information Sheet ▼

Comment  
(Diego Rodriguez)

09/08/2022 Order ▼

Comment  
on Motion for Sanctions

09/08/2022 Notice ▼

Comment  
of Available Deposition Dates As Requested

09/09/2022 Motion for Entry of Default ▼

Comment  
as to Freedom Man Press and Freedom Man PAC

09/09/2022 Declaration in Support of Motion ▼

Comment  
of Stidham in Support of Motion for Entry of Default as to Freedom Man Press and PAC

09/13/2022 Order for Entry of Default ▼

Comment  
Against Freedom Man Press LLC and Freedom Man PAC

09/14/2022 Order ▼

Comment  
for Scheduling Conference & Order Re: Motion Practice

09/14/2022 Notice ▼

Comment of Available Deposition Dates as Requested by Judge Norton for Diego Rodriguez
09/21/2022 Notice of Service
09/26/2022 Motion ▼  Comment for Further Sanctions and Renewed Motion for Contempt
09/26/2022 Memorandum In Support of Motion
09/26/2022 Affidavit in Support of Motion
09/28/2022 Statement ▼  Comment General Outline of Trial Procedures for a Pro Se Party
09/28/2022 Motion ▼  Comment for Award of Attorneys' Fees Against Ammon Bundy
09/28/2022 Memorandum In Support of Motion ▼  Comment for Award of Attorneys' Fees Against Ammon Bundy
09/28/2022 Declaration in Support of Motion ▼  Comment for Award of Attorneys' Fees Against Ammon Bundy
09/28/2022 Civil Notice of Hearing ▼  Comment October 11 2022 at 2:30 pm Motion for Sanctions and Renewed Motion for Contempt
09/29/2022 Notice & Order on Written Ex Parte or Prohibited Com.
10/04/2022 Notice of Service of Discovery Requests ▼  Comment Plaintiff s First Set of Interrogatories to Diego Rodriguez
10/04/2022 Motion ▼  Comment for Sanctions and Protective Order Relating to Limited Deposition of Diego Rodriguez

10/04/2022 Memorandum In Support of Motion ▼

Comment

for Sanctions and Protective Order Relating to Limited Deposition of Diego Rodriguez

10/04/2022 Declaration in Support of Motion ▼

Comment

Declaration of Attorney Stidham in Support of Motion for Sanctions and Protective Order for Deposition of Diego Rodriguez

10/04/2022 Motion for Reconsideration ▼

Comment

or Cancel the Courts Order on Motions for Sanctions

10/07/2022 Notice of Hearing ▼

Comment

on Motion for Further Sanctions and Motion for Award of Attorney's Fees (11/22/22 @3:15pm)

10/07/2022 Notice of Service of Discovery Requests ▼

Comment

Plaintiff's Second Interrogatories

10/11/2022 Scheduling Conference ▼

Original Type

Scheduling Conference

Judicial Officer

Norton, Lynn G.

Hearing Time

2:30 PM

Result

Hearing Held

Comment

Motion for Sanctions and Renewed Motion for Contempt

10/11/2022 Court Minutes ▼

Judicial Officer

Norton, Lynn G.

10/11/2022 Stipulation for Scheduling and Planning

10/12/2022 Order ▼

Comment Awarding Fees
10/12/2022 Order ▼  Comment Granting Motion for Preliminary Injunction
10/12/2022 Order ▼  Comment Granting in Part, Denying in Part, Motion for Further Sanctions & Renewed Motion for Contempt
10/14/2022 Notice ▼  Comment with the Court Requesting Service by Email
10/17/2022 Notice of Trial Setting, Final Pre-Trial Conference & Order
10/17/2022 Affidavit / Return of Service ▼  Comment Ammon Bundy (10/15/2022)
10/17/2022 Affidavit / Return of Service ▼  Comment Peoples Right Network (10/15/2022)
10/17/2022 Affidavit / Return of Service ▼  Comment Bundy for Governor Bundy (10/15/2022)
10/18/2022 Declaration ▼  Comment of Service - People's Rights Network - 3 Orders
10/18/2022 Declaration ▼  Comment of Service - Ammon Bundy - 3 Orders
10/18/2022 Declaration ▼  Comment of Service - Ammon Bundy for Governor - 3 Orders

10/19/2022 Notice of Service of Discovery Requests ▼  Comment Petitioner s Second Set of Interrogatories and Requests
10/19/2022 Motion ▼  Comment for Award of Attorneys' Fees Against Rodriguez (Stidham for Plaintiff)
10/19/2022 Memorandum In Support of Motion ▼  Comment for Award of Attorney Fees Against Rodriguez
10/19/2022 Declaration in Support of Motion ▼  Comment of Attorney Stidham in Support of Motion for Award of Attorneys' Fees Against Rodriguez
10/21/2022 Amended Notice of Hearing ▼  Comment November 22 2022 at 3:15 pm Motion for Sanctions, Motion for Award and Motion for Leave
10/24/2022 Notice of Service of Discovery Requests ▼  Comment Plaintiff s First Set of Interrogatories and Requests to Ammon Bundy for Governor
11/02/2022 Notice of Service ▼  Comment St. Luke's Health System, LTD of Out of State Subpoena to Givesendgo, LLC
11/02/2022 Application ▼  Comment for Writ of Execution
11/02/2022 Affidavit ▼  Comment of Erik F. Stidham in Support of Application for Writ of Execution
11/02/2022 Writ Issued ▼  Comment Execution (Gem County)

11/07/2022 Motion ▼

Comment

Expedited Motion for Court Approval to File an Extra Length Memorandum in Support of Plaintiffs' Motion for Punitive Damages

11/07/2022 Order ▼

Comment

Denying Expedited Motion for Court Approval to File an Extra Length Memorandum in Support of Plaintiffs' Motion for Punitive Damages [postage paid]

11/07/2022 Civil Notice of Hearing ▼

Comment

November 22 2022 at 3:15 pm Defendant s Motion to Reconsider

11/07/2022 Request for Discovery & Response to Request for Discovery

11/08/2022 Amended Notice of Hearing ▼

Comment

November 22 2022 at 3:15 pm Motion for Further Sanctions and Protective Order

11/08/2022 Civil Notice of Hearing ▼

Comment

December 20 2022 at 3:15 pm Motion for Leave to Amend Complaint

11/08/2022 Declaration in Support of Motion ▼

Comment

Supplemental Declaration of Attorney Stidham for Plaintiffs in Support of Motion for Sanctions, Protective Order

11/15/2022 Opposition to ▼

Comment

Rodriguez Motion to Cancel or Reconsider

11/15/2022 Declaration ▼

Comment

of Erik F. Stidham ISO Opposition to Rodriguez Motion to Cancel or Reconsider

11/21/2022 Declaration in Support of Motion ▼

Comment

Supplemental Declaration of Diego Rodriguez in Response to Plaintiffs' Opposition to Defendant Digeo Rodriguez's Verified Motion to Cancel or Reconsider the Courts Order on Motions for Sanctions



## 11/22/2022 Motion for Sanctions ▼

Original Type  
Motion for Sanctions

Judicial Officer  
Norton, Lynn G.

Hearing Time  
3:15 PM

Result  
Hearing Held

Comment  
Motion for Sanctions, Motion for Award and Motion for Leave and Motion to Reconsider

## 11/22/2022 Court Minutes ▼

Judicial Officer  
Norton, Lynn G.

## 11/22/2022 Declaration in Support of Motion ▼

Comment  
Second Supplemental Declaration of Erik F. Stidham in Support of Motion for Sanctions and Protective Order Relating to Limited Deposition of Diego Rodriguez Set October 5,2022

## 11/22/2022 Motion ▼

Comment  
Expedited Motion for Court Approval to File an Extra Length Memorandum In Support of Plaintiffs' Motion for Punitive Damages

## 11/22/2022 Memorandum In Support of Motion ▼

Comment  
Memorandum in Support of Expedited Motion for Court Approval to File an Extra Length Memorandum in Support of Plaintiffs' Motion for Punitive Damages

## 11/28/2022 Order ▼

Comment  
Denying Motion for Court Approval to File an Extra Length Memorandum in Support of Plaintiffs' Motion for Punitive Damages

## 11/29/2022 Memorandum ▼

Comment  
Decision & Order Denying Reconsideration & Granting Fees/Costs

## 11/29/2022 Memorandum ▼

## Comment

Decision &amp; Order Granting Protective Order Re: Depositions but Denying Sanctions

11/29/2022 Order ▼

## Comment

for Protection Re: Depositions

11/29/2022 Notice of Service

11/29/2022 Notice ▼

## Comment

of Fourth Judicial District Administrative Order No. 21-05-21-1

11/29/2022 Notice of Service

11/29/2022 Civil Notice of Hearing ▼

## Comment

12/20/22 @ 3:15 PM

11/30/2022 Notice &amp; Order on Written Ex Parte or Prohibited Com.

12/01/2022 Declaration ▼

## Comment

of Service of GiveSendGo Subpoena

12/05/2022 Sheriff's Return ▼

## Comment

on Writ and Writ - Gem County

12/05/2022 Declaration ▼

## Comment

of Erik Stidham ISO Motions for Leave to Amend Complaint to Allege Punitive Damages (redacted)

12/06/2022 Motion to File Under Seal

12/06/2022 Motion to Compel

12/06/2022 Declaration ▼

## Comment

of Erik Stidham in Support of Plaintiffs' Motion to Compel

12/06/2022 Memorandum In Support of Motion ▼

Comment to Compel
12/06/2022 Declaration ▼  Comment of Erik Stidham in Support of Motion for Protective Order Filed May 11, 2022
12/06/2022 Memorandum In Support of Motion ▼  Comment to Seal
12/06/2022 Motion ▼  Comment for Leave to Amend the First Amended Complaint to Allege Punitive Damages as to Defendant Diego Rodriguez (redacted)
12/06/2022 Memorandum In Support of Motion ▼  Comment for Leave to Amend Complaint to Allege Punitive Damages Against Diego Rodriguez (Redacted)
12/06/2022 Motion ▼  Comment for Leave to Amend the First Amended Complaint to Allege Punitive Damages as to Default Defendants (Redacted)
12/06/2022 Memorandum In Support of Motion ▼  Comment for Leave to Amend Complaint to Allege Punitive Damages as to Defaulted Defendants (Redacted)
12/06/2022 Declaration ▼  Comment of Jessica Flynn in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages
12/06/2022 Declaration ▼  Comment of John Coggins in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages
12/06/2022 Declaration ▼  Comment of Natasha D. Erickson in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages (redacted)

12/06/2022 Declaration ▼

Comment  
of Tracy W. Jungman in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages  
(redacted)

12/06/2022 Declaration ▼

Comment  
of Chris Roth in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages  
(redacted)

12/06/2022 Declaration ▼

Comment  
of Jeffrey Erickson in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages

12/06/2022 Declaration ▼

Comment  
of Dennis Mesaros in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages  
(redacted)

12/06/2022 Declaration ▼

Comment  
of Donn English in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages

12/06/2022 Declaration ▼

Comment  
of Dr. Jamie Price in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages  
(redacted)

12/06/2022 Declaration ▼

Comment  
of Camille LaCroix, MD, DFAPA in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages

12/06/2022 Declaration ▼

Comment  
of William Woods in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages

12/06/2022 Declaration ▼

Comment  
of C.P. "Abbey" Abbondandolo in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages (redacted)

12/06/2022 Declaration ▼

Comment

of Katy Alexander in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages

12/06/2022 Declaration ▼

Comment

of Marle Hoff in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages

12/07/2022 Exhibit ▼

Comment

Exhibits 72-83 to Declaration of Erik F. Stidham in Support of Motions to Amend Complaint to Allege Punitive Damages (redacted)

12/09/2022 Notice of Service ▼

Comment

First Interrogatories and Requests for Production to Defendant

12/12/2022 Declaration ▼

Comment

of Service of Sealed Envelope - Ammon Bundy

12/12/2022 Declaration ▼

Comment

of Service of Sealed Envelope - Ammon Bundy for Governor

12/12/2022 Declaration ▼

Comment

of Service of Sealed Envelope- People's Rights Network

12/12/2022 Declaration ▼

Comment

of Service of Sealed Envelope - Ammon Bundy for Governor

12/12/2022 Declaration ▼

Comment

of Service of Sealed Envelope - People's Rights Network

12/13/2022 Order ▼

<p>Comment Awarding Fees</p>
<p>12/13/2022 Civil Notice of Hearing ▼</p> <p>Comment 01/17/23 @ 3:15 PM</p>
<p>12/13/2022 Order ▼</p> <p>Comment Vacating and Resetting Hearing</p>
<p>12/13/2022 Motion ▼</p> <p>Comment for Clarification of Order</p>
<p>12/13/2022 Memorandum In Support of Motion ▼</p> <p>Comment for Clarification of Order</p>
<p>12/13/2022 Amended Notice of Hearing ▼</p> <p>Comment Motion to Compel (01/24/2023 at 3:15 pm)</p>
<p>12/20/2022 Motion for Protective Order ▼</p> <p>Original Type Motion for Protective Order</p> <p>Judicial Officer Norton, Lynn G.</p> <p>Hearing Time 3:15 PM</p> <p>Result Hearing Held</p>
<p>12/20/2022 Court Minutes ▼</p> <p>Judicial Officer Norton, Lynn G.</p>
<p>12/21/2022 Notice ▼</p> <p>Comment of Errata</p>

12/21/2022 Notice of Remote Hearing ▼

Comment

Motion to Seal (1/24/23 @ 3:15PM)

12/27/2022 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum to Aaron Welling

12/27/2022 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum to Freedom Tabernacle, Incorporated

12/27/2022 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum to Power Marketing Agency, LLC

12/27/2022 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum to Power Marketing Consultants LLC

12/28/2022 Notice of Service of Discovery Requests ▼

Comment

Plaintiff s First Set of Interrogatories and Requests

12/29/2022 Motion ▼

Comment

for Order Permitting Issuance of Subpoenas

12/29/2022 Memorandum In Support of Motion ▼

Comment

for Order Permitting Issuance of Subpoenas

12/29/2022 Notice of Service ▼

Comment

Plaintiff St Lukes Requests for Admission to Defendants People Rights Network and Ammon Bundy for Governor

12/30/2022 Notice of Service of Discovery Requests ▼

Comment  
Plaintiff s First Requests for Admissions

01/04/2023 Order ▼

Comment  
Permitting Issuance of Subpoenas

01/05/2023 Notice ▼

Comment  
of Intent to Serve Foreign Subpoena - Dono Custos Inc

01/05/2023 Notice ▼

Comment  
of Intent to Serve Foreign Subpoena - Abish-husbandi Inc

01/06/2023 Declaration ▼

Comment  
Supplemental Declaration of Erik F. Stidham in Support of Plaintiffs' Motion to Compel

01/06/2023 Declaration ▼

Comment  
Supplemental Declaration of Erik F. Stidham in Support of Motions for Lave to Amend Complaint to Allege Punitive Damages

01/09/2023 Declaration in Support of Motion ▼

Comment  
Second Supplemental Declaration of Attorney Stidham in Support of Plaintiffs' Motion to Compel

01/10/2023 Motion ▼

Comment  
to Seal

01/10/2023 Memorandum In Support of Motion ▼

Comment  
to Seal

01/10/2023 Motion ▼

Comment  
for Leave to File Third Amended Complaint as to Default Defendants

01/10/2023 Memorandum In Support of Motion ▼



<p>Comment Memorandum in Support of Motions for Leave to File Third Amended Complaint</p>
<p>01/10/2023 Motion ▾</p> <p>Comment for Leave to File Third Amended Complaint as to Rodriguez</p>
<p>01/10/2023 Civil Notice of Hearing ▾</p> <p>Comment (1/24/2023 @3:15PM)</p>
<p>01/10/2023 Declaration in Support of Motion ▾</p> <p>Comment for Leave to File Third Amended Complaint</p>
<p>01/17/2023 Motion to Compel ▾</p> <p>Judicial Officer Norton, Lynn G.</p> <p>Hearing Time 3:15 PM</p> <p>Cancel Reason Vacated</p> <p>Comment Defendant Diego Rodriquez</p>
<p>01/18/2023 Declaration ▾</p> <p>Comment of Certified Mail - Freedom Tabernacle, Inc.</p>
<p>01/18/2023 Declaration ▾</p> <p>Comment of Certified Mail - Power Marketing</p>
<p>01/18/2023 Declaration ▾</p> <p>Comment of Certified Mail - Miranda Chavoya</p>
<p>01/18/2023 Declaration ▾</p> <p>Comment of Certified Mail - D. Rodriguez - Meridian</p>

01/18/2023 Declaration ▼  Comment of Certified Mail - D. Rodriguez - Boise
01/18/2023 Declaration ▼  Comment of Certified Mail - D. Rodriguez - Orlando
01/18/2023 Declaration ▼  Comment of Service by Mail Box - Ammon Bundy for Governor
01/18/2023 Declaration ▼  Comment of Service by Mail Box - PRN
01/18/2023 Declaration ▼  Comment of Service to PO Box - Ammon Bundy for Governor
01/18/2023 Declaration ▼  Comment of Service by PO Box - PRN
01/18/2023 Declaration ▼  Comment of Service by Mail Box - Ammon Bundy
01/19/2023 Order ▼  Comment Protective Order
01/19/2023 Declaration ▼  Comment of Service - Ammon Bundy, Ammon Bundy for Governor, PRN ( affixed to the outside of the mailbox)
01/19/2023 Declaration in Support of Motion ▼  Comment to Compel

01/24/2023 Motion to Amend ▼

Original Type  
Motion to Amend

Judicial Officer  
Norton, Lynn G.

Hearing Time  
3:15 PM

Result  
Hearing Held

01/24/2023 Motion to Compel ▼

Original Type  
Motion to Compel

Judicial Officer  
Norton, Lynn G.

Hearing Time  
3:15 PM

Result  
Hearing Held

Comment  
Defendant Diego Rodriguez

01/24/2023 Court Minutes ▼

Judicial Officer  
Norton, Lynn G.

01/30/2023 Motion ▼

Comment  
for Extension of Time to Disclose Expert Witnesses

01/30/2023 Memorandum In Support of Motion ▼

Comment  
for Extension of Time to Disclose Expert Witnesses

01/30/2023 Declaration ▼

Comment  
of Erik F Stidham in Support of Plaintiffs' Motion for Extension of Time to Disclose Expert Witnesses

02/01/2023 Scheduling Order ▼

Comment  
for PI's Motion for Extension of Time to Disclose Expert Witnesses

02/07/2023 Motion for Contempt ▼

Comment  
Against Ammon Bundy and People's Rights Network

02/07/2023 Memorandum In Support of Motion ▼

Comment  
for Contempt Against Ammon Bundy and People's Rights Network

02/07/2023 Civil Notice of Hearing ▼

Comment  
(02/21/2023 at 4:00pm)

02/07/2023 Affidavit in Support of Motion ▼

Comment  
of Jennifer Jensen for Motion for Contempt Against Ammon Bundy and People's Rights Network

02/08/2023 Order ▼

Comment  
Granting Motion to Seal

02/08/2023 Order ▼

Comment  
Granting Motion to Seal

02/08/2023 Order ▼

Comment  
Granting Motion for Extension of Time Disclosure Expert Witnesses

02/08/2023 Memorandum ▼

Comment  
Decision on Motion to Compel Diego Rodriguez to Respond to Discovery

02/08/2023 Order ▼

Comment  
Compelling Defendant Rodriguez to Respond to Discovery

02/08/2023 Order ▼

Comment

Granting Leave to File Third Amended Complaint that Includes a Punitive Damages Claim

02/10/2023 Motion to Seal Case ▼

Comment

Third Amended Complaint

02/10/2023 Civil Notice of Hearing ▼

Comment

2/28/2023 @ 3:15 PM

02/10/2023 Memorandum In Support of Motion ▼

Comment

to Seal

02/10/2023 Amended Complaint Filed ▼

Comment

Third - Demand for Jury Trial - Redacted

02/10/2023 Amended Summons Issued ▼

Comment

and Filed - Diego Rodriguez

02/10/2023 Amended Summons Issued ▼

Comment

Second Amended Summons and Filed - Freedom Man PAC

02/10/2023 Amended Summons Issued ▼

Comment

Second Amended Summons and Filed - Freedom Man Press

02/10/2023 Amended Summons Issued ▼

Comment

Third Amended Summons and Filed - Ammon Bundy for Governor

02/10/2023 Amended Summons Issued ▼

Comment

Third Amended Summons and Filed - Ammon Bundy

02/10/2023 Amended Summons Issued ▼

<p>Comment Third Amended Summons - People's Rights Network</p>
<p>02/10/2023 Summons ▼ Unserved</p>
<p>02/10/2023 Summons ▼ Unserved</p>
<p>02/10/2023 Summons ▼ Unserved</p>
<p>02/10/2023 Summons ▼ Served 03/03/2023</p>
<p>02/10/2023 Summons ▼ Served 03/03/2023</p>
<p>02/10/2023 Summons ▼ Served 03/03/2023</p>
<p>02/14/2023 Motion to File Under Seal ▼  Comment Motion for Leave to File Fourth Amended Complaint, Fourth Amended Complaint</p>
<p>02/14/2023 Memorandum In Support of Motion ▼  Comment to Seal</p>
<p>02/14/2023 Motion ▼  Comment for Leave to File Fourth Amended Complaint</p>
<p>02/14/2023 Memorandum In Support of Motion ▼  Comment for Leave to Amend</p>

02/14/2023 Declaration ▼

Comment  
of Erik F Stidham in Support of Motion for Leave to File Fourth Amended Complaint

02/14/2023 Civil Notice of Hearing ▼

Comment  
2/28/2023 @ 3:15 PM

02/15/2023 Declaration ▼

Comment  
of Service - A Bundy for Gov

02/15/2023 Declaration ▼

Comment  
of Service - A Bundy

02/15/2023 Declaration ▼

Comment  
of Service - A Bundy for Gov PO

02/15/2023 Declaration ▼

Comment  
of Service - PRN

02/15/2023 Declaration ▼

Comment  
of Service - PRN PO

02/17/2023 Motion ▼

Comment  
to Submit Supplemental Affidavit in Support of Motion for Contempt Against Ammon Bundy and People's Rights Network and to Shorten Time

02/17/2023 Memorandum In Support of Motion ▼

Comment  
Memorandum in Support of Motion to Submit Supplemental Affidavit in Support of Motion for Contempt Against Ammon Bundy and People's Rights Network and to Shorten Time

02/17/2023 Civil Notice of Hearing ▼

Comment

Motion to Submit Supplemental Affidavit ISO Motion for Contempt (2/21/23 at 4 pm)

02/17/2023 Affidavit in Support of Motion ▾

Comment

Supplemental Affidavit of Jennifer Jensen in Support of Motion for Contempt Against Ammon Bundy and People's Rights Network

02/20/2023 Notice ▾

Comment

of Diego Rodriguez's Failure to Comply With Order

02/21/2023 Contempt Hearing ▾

Original Type

Contempt Hearing

Judicial Officer

Norton, Lynn G.

Hearing Time

4:00 PM

Result

Hearing Held

Comment

Motion for Contempt Against Ammon Bundy and People's Rights Network

02/21/2023 Court Minutes ▾

Judicial Officer

Norton, Lynn G.

02/21/2023 Declaration ▾

Comment

of Service - Bundy for Gov - Motion for 4th Am. Compl.

02/21/2023 Declaration ▾

Comment

of Service - A. Bundy For Gov - Third Am. Compl.

02/21/2023 Declaration ▾

Comment

of Service - A. Bundy - Motion for 4th Am. Compl.

02/21/2023 Declaration ▾



Comment  
of Service - A. Bundy - Third Am. Compl.

02/21/2023 Declaration ▼

Comment  
of Service - PRN - Motion for 4th Am. Compl.

02/21/2023 Declaration ▼

Comment  
of Service - PRN - PO - Motion for 4th Am. Compl.

02/21/2023 Declaration ▼

Comment  
of Service - PRN - Third Am. Compl.

02/21/2023 Declaration ▼

Comment  
of Service - A. Bundy for Gov - Motion for 4th Am. Compl.

02/21/2023 Affidavit ▼

Comment  
Second Supplemental Affidavit of Jennifer Jensen in Support of Motion for Contempt Against Ammon Bundy and People's Rights Network

02/22/2023 Order ▼

Comment  
Vacating Arraignment on Motion for Contempt & Requiring Service & Summons for New Hearing Date

02/22/2023 Motion ▼

Comment  
Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez Pursuant to the Court's 2/8/23 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery (re: Failure to Respond to Discovery Requests)

02/22/2023 Memorandum In Support of Motion ▼

Comment  
Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez Pursuant to the Court's 2/8/23 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery (re: Failure to Respond to Discovery)

02/22/2023 Declaration in Support of Motion ▼

## Comment

Declaration of Erik F. Stidham in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez Pursuant to the Court's 2/8/23 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery (re: Failure to Respond to Discovery)

## 02/22/2023 Motion ▼

## Comment

Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez Pursuant to the Court's 2/8/23 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery (re: Failure to Attend Deposition)

## 02/22/2023 Memorandum In Support of Motion ▼

## Comment

Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez Pursuant to the Court's 2/8/23 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery (re: Failure to Attend Deposition)

## 02/22/2023 Declaration in Support of Motion ▼

## Comment

Declaration of Erik F. Stidham in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez Pursuant to the Court's 2/8/23 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery (re: Failure to Attend Deposition)

## 02/28/2023 Motion Hearing ▼

## Original Type

Motion Hearing

## Judicial Officer

Norton, Lynn G.

## Hearing Time

3:15 PM

## Result

Hearing Held

## Comment

Plaintiffs' Motion to Seal Third Amended Complaint; Motion for Leave to File Fourth Amended Complaint

## 02/28/2023 Court Minutes ▼

## Judicial Officer

Norton, Lynn G.

## 03/01/2023 Order ▼

## Comment

Granting Plaintiffs' Motion to Seal Third Amended Complaint

## 03/01/2023 Order ▼

Comment  
Granting Motion to Seal

03/01/2023 Order ▼

Comment  
Granting Plaintiffs' Motion for Leave to File Fourth Amended Complaint

03/01/2023 Amended Summons Issued ▼

Comment  
and Filed - Ammon Bundy

03/01/2023 Amended Summons Issued ▼

Comment  
and Filed - Ammon Bundy for Governor

03/01/2023 Amended Summons Issued ▼

Comment  
and Filed - People's Rights Network

03/01/2023 Amended Summons Issued ▼

Comment  
and Filed - Diego Rodriguez

03/01/2023 Amended Summons Issued ▼

Comment  
and Filed - Freedom Man PAC

03/01/2023 Amended Summons Issued ▼

Comment  
and Filed - Freedom Man Press

03/01/2023 Summons ▼

Unserved

03/01/2023 Summons ▼

Served  
03/03/2023

03/01/2023 Summons ▼

Served 03/03/2023
03/01/2023 Summons ▼  Unserved
03/01/2023 Summons ▼  Unserved
03/01/2023 Summons ▼  Unserved
03/03/2023 Amended Complaint Filed ▼  Comment Redacted Fourth Complaint and Demand for Jury Trial
03/07/2023 Motion to Compel ▼  Comment and Motion for Sanctions
03/07/2023 Memorandum In Support of Motion ▼  Comment for Sanctions and Motion to Compel
03/07/2023 Declaration ▼  Comment of Erik Stidham in Support of Motion for Sanctions and Motion to Compel
03/07/2023 Civil Notice of Hearing ▼  Comment Motion (3/21/2023 @ 3:15 PM)
03/07/2023 Motion ▼  Comment for Sanctions for Failure to Comply with Court Orders
03/07/2023 Memorandum In Support of Motion ▼  Comment for Sanctions for Failure to Comply

03/07/2023 Declaration ▼

Comment  
of Erik Stidham in Support of Motion for Sanctions for Failure to Comply

03/10/2023 Witness Disclosure ▼

Comment  
Notice of Disclosure of Expert Witnesses

03/15/2023 Answer ▼

Comment  
to Fourth Amended Complaint and Demand for Jury Trial

03/20/2023 Affidavit / Return of Service ▼

Comment  
3/3/23 - A. Bundy

03/20/2023 Affidavit / Return of Service ▼

Comment  
3/3/23 - Bundy for Gov

03/20/2023 Affidavit / Return of Service ▼

Comment  
3/3/23 - Bundy for Gov - PO Box

03/20/2023 Affidavit / Return of Service ▼

Comment  
03/03/2023 - PRN

03/20/2023 Affidavit / Return of Service ▼

Comment  
3/3/23 - PRN - PO Box

03/20/2023 Memorandum In Support of Motion ▼

Comment  
for Dismissal of Sanctions Against Defendant Rodriguez for Alleged Failure to Comply with Court Orders

03/21/2023 Motion Hearing ▼

Original Type  
Motion Hearing

Judicial Officer  
Norton, Lynn G.

Hearing Time  
3:15 PM

Result  
Hearing Held

Comment  
Motion for Sanctions for Failure to Appear, Motion for Sanctions Against Defendant Rodriguez, Motion for Award of Attorney's Fees and Costs

03/21/2023 Notice & Order on Written Ex Parte or Prohibited Com.

03/21/2023 Motion to Dismiss ▼

Comment  
of Motion for Sanctions Against Defendant Rodriguez for Alleged Failure to Comply with Court Orders

03/21/2023 Court Minutes ▼

Judicial Officer  
Norton, Lynn G.

03/21/2023 Notice of Service of Discovery Requests ▼

Comment  
Plaintiffs St. Lukes Requests For Admissions To Defendant Diego

03/21/2023 Notice of Service ▼

Comment  
Defendants First Set of Interrogatories

03/22/2023 Order ▼

Comment  
Awarding Fees Against Diego Rodriguez

03/30/2023 Motion to Compel ▼

Comment  
Compliance with Subpoenas

03/30/2023 Memorandum In Support of Motion ▼

Comment  
Motion to Compel Compliance with Subpoenas

03/30/2023 Declaration in Support of Motion ▼

Comment  
of Attorney Stidham in Support of Motion to Compel Compliance with Subpoenas with exhibits

03/30/2023 Civil Notice of Hearing ▼

Comment  
April 18 2023 at 3:15 pm Motion to Compel Compliance with Subpoenas

03/30/2023 Motion ▼

Comment  
Renewed Motion for Contempt

03/30/2023 Memorandum In Support of Motion ▼

Comment  
for Contempt

03/30/2023 Summons Issued ▼

Comment  
- Contempt Hearing 4/18/23

03/30/2023 Civil Notice of Hearing ▼

Comment  
4/18/2023 @ 3:15 PM

03/30/2023 Affidavit ▼

Comment  
of N. Erickson iso Motion for Contempt

03/30/2023 Affidavit ▼

Comment  
of D. Burghart iso Motion for Contempt

03/30/2023 Affidavit ▼

Comment  
of S. Fomby iso Motion for Contempt

03/30/2023 Affidavit ▼

Comment  
of J. Jensen iso Motion for Contempt

03/30/2023 Summons ▼

Served  
04/03/2023

Served  
04/03/2023

04/03/2023 Motion ▼

Comment  
to Appoint Discovery Referee

04/03/2023 Memorandum In Support of Motion ▼

Comment  
to Appoint Discovery Referee

04/03/2023 Affidavit in Support of Motion ▼

Comment  
for Appointment of Discovery Referee

04/03/2023 Motion ▼

Comment  
to Enter Confidentiality Protective Order

04/03/2023 Memorandum In Support of Motion ▼

Comment  
to Enter Protective Order for Confidentiality

04/03/2023 Declaration in Support of Motion ▼

Comment  
to Enter Protective Order for Confidentiality in Discovery

04/03/2023 Civil Notice of Hearing ▼

Comment  
Motion to Appoint Discovery Referee (04/18/23 @3:15pm)

04/03/2023 Affidavit in Support of Motion ▼

Comment  
to Compel Compliance With Subpoenas

04/04/2023 Application for Entry of Default ▼

Comment  
and Default Judgment on Fourth Amended Complaint as to Ammon Bundy, Ammon Bundy for Governor and People's Rights Network



04/04/2023 Memorandum In Support of Motion ▼

Comment

or Application for Entry of Default and Default Judgment on 4th Amended Complaint as to Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network

04/04/2023 Affidavit in Support of Motion ▼

Comment

or Application for Entry of Default and Default Judgment on 4th Amended Complaint as to Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network

04/05/2023 Affidavit / Return of Service ▼

Comment

- Ammon Bundy

04/05/2023 Affidavit / Return of Service ▼

Comment

- People's Rights Network

04/07/2023 Notice ▼

Comment

of Intent to Serve Amended Foreign Subpoena - Dono Custos

04/10/2023 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum - AbishHusbandi Inc

04/11/2023 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum to Meridian Police Department

04/12/2023 Notice ▼

Comment

of Intent to Serve Subpoena Duces Tecum to Boise Police Department

04/12/2023 Notice ▼

Comment

of Intent to Serve Foreign Subpoena Duces Tecum to Anedot, Inc.

04/13/2023 Notice ▼

Comment  
of Intent to Service Subpoena Duces Tecum to White Barn Enterprises LLC

04/13/2023 Notice ▼

Comment  
of Intent to Serve Subpoena Duces Tecum to Reisse Perin

04/13/2023 Notice ▼

Comment  
of Intent to Serve Subpoena Duces Tecum to Ada County Prosecutor's Office

04/13/2023 Amended ▼

Comment  
Notice of Intent to Serve Foreign Subpoena Duces Tecum to Stripe, Inc.

04/14/2023 Notice ▼

Comment  
of Intent to Serve Amended Subpoena Duces Tecum to Aaron Welling

04/14/2023 Notice ▼

Comment  
of Intent to Serve Foreign Subpoena Duces Tecum to Farmhouse Holdings LLC

04/14/2023 Notice ▼

Comment  
of Intent to Serve Foreign Subpoena Duces Tecum to Lexie Rivers (aka Lexie Smith)

04/17/2023 Notice of Service

04/18/2023 Motion to Compel ▼

Original Type  
Motion to Compel

Judicial Officer  
Norton, Lynn G.

Hearing Time  
3:15 PM

Result  
Hearing Held

Comment  
& Renewed Motion for Contempt Against Ammon Bundy and People's Rights Network

04/18/2023 Supreme Court Document Filed-Misc ▼

## Comment

Notice of Filing- 505697-2023

04/18/2023 Notice of Filing ▼

## Comment

of Petition for Writ of Mandamus

04/18/2023 Court Minutes ▼

## Judicial Officer

Norton, Lynn G.

04/18/2023 Warrant of Attachment

04/19/2023 Order on Motion ▼

## Comment

to Enter Confidentiality Protective Order

04/19/2023 Sheriff's Return ▼

## Comment

of Service (04/03/2023 People's Rights Network)

04/19/2023 Sheriff's Return ▼

## Comment

of Service (04/03/2023 Ammon Bundy)

04/19/2023 Affidavit / Return of Service ▼

## Comment

of Amended Deposition Subpoena Duces Tecum to Dono Custos INC (04/14/2023)

04/19/2023 Memorandum In Support of Motion ▼

## Comment

Proposed Order of Default

04/21/2023 Notice of Service

04/21/2023 Notice ▼

## Comment

of Intent to Serve Subpoena Duces Tecum to Nathan Jones

04/24/2023 Order for Entry of Default ▼

Comment  
on Fourth Amended Complaint Against Ammon Bundy

04/24/2023 Memorandum ▼

Comment  
Decision on Motion for Sanctions & to Compel Against Ammon Bundy

04/24/2023 Order ▼

Comment  
Compelling Ammon Bundy to Respond to Discovery & Notices of Deposition

04/24/2023 Civil Notice of Hearing ▼

Comment  
May 16 2023 at 3:15 pm Scheduling Conference

04/25/2023 Order ▼

Comment  
Granting Pl's Motion for Sanctions Against Rodriguez for Failure to Comply with Court Orders

04/25/2023 Order ▼

Comment  
Appointing Discovery Master or Referee

04/25/2023 Declaration ▼

Comment  
of Service - Subpoena-Meridian Police Department

04/27/2023 Affidavit / Return of Service ▼

Comment  
Subpoena- Boise Police Dept

04/27/2023 Affidavit / Return of Service ▼

Comment  
of Letter, Protective Order- Garth Gaylord

04/27/2023 Affidavit / Return of Service ▼

Comment  
Subpoena - Reisse Perin

04/28/2023 Affidavit / Return of Service ▼

Comment  
Subpoena - Farmhouse Holdings LLC

04/28/2023 Affidavit / Return of Service ▼

Comment  
Subpoena - Stripe Inc

04/28/2023 Affidavit / Return of Service ▼

Comment  
Subpoena - Lexie Rivers (aka Lexie Smith)

05/01/2023 Order ▼

Comment  
Resetting Scheduling Conference

05/02/2023 Motion ▼

Comment  
To Seal

05/02/2023 Motion to Compel ▼

Comment  
and for Sanctions as to People's Rights Network and Ammon Bundy for Governor

05/02/2023 Memorandum In Support of Motion ▼

Comment  
to Compel and for Sanctions as to People's Rights Network and Ammon Bundy for Governor

05/02/2023 Affidavit ▼

Comment  
of Erik F Stidham in Support of Motion to Compel and for Sanctions as to People's Rights Network

05/02/2023 Motion ▼

Comment  
for Award of Attorneys' Fees Against Ammon Bundy and People's Rights Network

05/02/2023 Memorandum In Support of Motion ▼

Comment  
for Award of Attorneys' Fees Against Ammon Bundy and People's Rights Network

05/02/2023 Declaration ▼

Comment of Erik Stidham in Support of Motion for Award of Attorneys' Fees Against Ammon Bundy & People's Rights Network
05/02/2023 Motion ▼  Comment for Award of Attorneys' Fees Against Rodriguez
05/02/2023 Memorandum In Support of Motion ▼  Comment for Award of Attorneys' Fees Against Rodriguez
05/02/2023 Declaration ▼  Comment of Erik Stidham in Support of Motion for Award of Attorneys' Fees Against Rodriguez
05/02/2023 Memorandum In Support of Motion ▼  Comment to Seal
05/02/2023 Civil Notice of Hearing ▼  Comment on Motion for Contempt 5/16/23 @ 3:15
05/02/2023 Motion for Contempt ▼  Comment Against D. Rodriguez
05/02/2023 Memorandum In Support of Motion
05/02/2023 Affidavit in Support of Motion ▼  Comment Of Chris Roth
05/02/2023 Affidavit in Support of Motion ▼  Comment of D. Jeppesen
05/02/2023 Affidavit in Support of Motion ▼  Comment of D. Burghart

05/02/2023 Affidavit in Support of Motion ▼  Comment of Dr. Erickson - Redacted
05/02/2023 Affidavit in Support of Motion ▼  Comment of K. Nate
05/02/2023 Affidavit in Support of Motion ▼  Comment of K. Shoplock
05/02/2023 Affidavit in Support of Motion ▼  Comment of Spencer Fomby
05/02/2023 Affidavit in Support of Motion ▼  Comment of Tracy Jungman
05/02/2023 Affidavit in Support of Motion ▼  Comment of J. Jensen - Redacted
05/04/2023 Affidavit / Return of Service ▼  Comment - Abish Husbandi Inc
05/04/2023 Affidavit / Return of Service ▼  Comment - Peoples Rights Network
05/04/2023 Affidavit / Return of Service ▼  Comment - Ammon Bundy for Governor
05/04/2023 Affidavit / Return of Service ▼  Comment - Ammon Bundy

05/04/2023 Affidavit / Return of Service ▼

Comment

- Ada County Prosecuting Attorney

05/04/2023 Affidavit / Return of Service ▼

Comment

- White Barn Enterprises LLC

05/04/2023 Affidavit / Return of Service ▼

Comment

- Power Marketing Agency

05/05/2023 Notice ▼

Comment

of Intent to Service Subpoena for Deposition Duces Tecum to Marissa Anderson

05/05/2023 Notice ▼

Comment

of Intent to Serve Subpoena for Deposition Duces Tecum to Levi Anderson

05/08/2023 Affidavit / Return of Service ▼

Comment

of Subpoena on Freedom Tabernacle, Incorporated

05/08/2023 Affidavit / Return of Service ▼

Comment

of Subpoena on Power Marketing Consultants, LLC

05/08/2023 Affidavit / Return of Service ▼

Comment

of Subpoena on Aaron Welling

05/16/2023 Motion for Contempt ▼

Judicial Officer  
Norton, Lynn G.

Hearing Time  
3:15 PM

05/23/2023 Status Conference ▼



Judicial Officer  
Norton, Lynn G.

Hearing Time  
2:30 PM

Comment  
& Scheduling Conference

06/06/2023 Pre-trial Conference ▾

Judicial Officer  
Norton, Lynn G.

Hearing Time  
2:30 PM

07/10/2023 Jury Trial ▾

Judicial Officer  
Norton, Lynn G.

Hearing Time  
8:30 AM

Comment  
10 days

## Financial

St Lukes Health System LTD

Total Financial Assessment	\$426.30
Total Payments and Credits	\$426.30

5/11/2022	Transaction Assessment			\$221.00
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5/11/2022	Case Payment	Receipt # 41829-2022-R01	St Lukes Health System LTD	(\$221.00)
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7/7/2022	Transaction Assessment			\$9.00
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7/7/2022	EFile Payment	Receipt # 59037-2022-R01	St Lukes Health System LTD	(\$9.00)
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8/16/2022	Transaction Assessment			\$38.40
8/16/2022	EFile Payment	Receipt # 70038-2022-R01	St Lukes Health System LTD	(\$38.40)
9/12/2022	Transaction Assessment			\$8.10
9/12/2022	EFile Payment	Receipt # 76915-2022-R01	St Lukes Health System LTD	(\$8.10)
11/3/2022	Transaction Assessment			\$2.00
11/3/2022	EFile Payment	Receipt # 94169-2022-R01	St Lukes Health System LTD	(\$2.00)
11/7/2022	Transaction Assessment			\$3.60
11/7/2022	EFile Payment	Receipt # 95445-2022-R01	St Lukes Health System LTD	(\$3.60)
11/23/2022	Transaction Assessment			\$7.20
11/23/2022	EFile Payment	Receipt # 101064-2022-R01	St Lukes Health System LTD	(\$7.20)
12/7/2022	Transaction Assessment			\$7.20
12/7/2022	EFile Payment	Receipt # 104169-2022-R01	St Lukes Health System LTD	(\$7.20)
12/8/2022	Transaction Assessment			\$18.40
12/8/2022	EFile Payment	Receipt # 104396-2022-R01	St Lukes Health System LTD	(\$18.40)
12/30/2022	Transaction Assessment			\$7.20
12/30/2022	EFile Payment	Receipt # 109799-2022-R01	St Lukes Health System LTD	(\$7.20)
1/31/2023	Transaction Assessment			\$7.20
1/31/2023	EFile Payment	Receipt # 08007-2023-R01	St Lukes Health System LTD	(\$7.20)
2/13/2023	Transaction Assessment			\$7.20
2/13/2023	EFile Payment	Receipt # 11788-2023-R01	St Lukes Health System LTD	(\$7.20)

2/15/2023	Transaction Assessment			\$7.20
2/15/2023	EFile Payment	Receipt # 12995-2023-R01	St Lukes Health System LTD	(\$7.20)
2/16/2023	Transaction Assessment			\$7.20
2/16/2023	EFile Payment	Receipt # 13284-2023-R01	St Lukes Health System LTD	(\$7.20)
2/21/2023	Transaction Assessment			\$7.20
2/21/2023	EFile Payment	Receipt # 14139-2023-R01	St Lukes Health System LTD	(\$7.20)
2/23/2023	Transaction Assessment			\$14.40
2/23/2023	EFile Payment	Receipt # 15386-2023-R01	St Lukes Health System LTD	(\$14.40)
4/4/2023	Transaction Assessment			\$25.60
4/4/2023	EFile Payment	Receipt # 28440-2023-R01	St Lukes Health System LTD	(\$25.60)
4/20/2023	Transaction Assessment			\$7.20
4/20/2023	EFile Payment	Receipt # 33529-2023-R01	St Lukes Health System LTD	(\$7.20)
5/3/2023	Transaction Assessment			\$14.00
5/3/2023	EFile Payment	Receipt # 37287-2023-R01	St Lukes Health System LTD	(\$14.00)
5/3/2023	Transaction Assessment			\$7.00
5/3/2023	EFile Payment	Receipt # 37312-2023-R01	St Lukes Health System LTD	(\$7.00)
St Lukes Regional Medical Center LTD				
Total Financial Assessment				\$5.40
Total Payments and Credits				\$5.40
6/3/2022	Transaction Assessment			\$2.70
6/3/2022	EFile Payment	Receipt # 49307-2022-R01	St Lukes Regional Medical Center LTD	(\$2.70)

6/6/2022	Transaction Assessment			\$2.70
6/6/2022	EFile Payment	Receipt # 49741-2022-R01	St Lukes Regional Medical Center LTD	(\$2.70)
Rodriguez, Diego				
	Total Financial Assessment			\$136.00
	Total Payments and Credits			\$136.00
9/13/2022	Transaction Assessment			\$136.00
9/13/2022	EFile Payment	Receipt # 77743-2022-R01	Rodriguez, Diego	(\$136.00)

# **EXHIBIT C**

**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; and  
NATASHA D. ERICKSON, MD, 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. **CV 01 22 06789**

**ORDER GRANTING MOTION FOR  
PRELIMINARY INJUNCTION**

THIS MATTER having come before the Court on Plaintiffs Chris Roth and Natasha Erickson's Motion for a Preliminary Injunction, the Court finds good cause to approve said Motion as to the defaulted parties Ammon Bundy, an individual; Ammon Bundy for Governor; Freedom Man Press LLC; Freedom Man PAC; and People's Rights Network.

NOW, THEREFORE, it is hereby ordered that the Motion for a Preliminary Injunction is GRANTED and Defendants Ammon Bundy, Freedom Man Press LLC, and People's Rights Network are enjoined to remove:

- Statements on the [www.peoplesrights.org](http://www.peoplesrights.org) website stating or alleging that Chris Roth is a criminal accessory of child abduction; and
- Statements on the [www.freedomman.org](http://www.freedomman.org) website stating or alleging that Natasha Erickson is responsible for kidnapping or child trafficking.

IT IS SO ORDERED.

DATED 10/12/2022



Lynn Norton  
District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Erik F. Stidham  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-5974

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
efstidham@hollandhart.com

Diego Rodriguez  
1317 Edgewater Drive #5077  
Orlando, FL 32804

- By mail
- By E-mail: freedommanpress@protonmail.com



\_\_\_\_\_  
Clerk of the Court 10/12/2022 11:09:07 AM  
Deputy

18751567\_v1



# **EXHIBIT D**

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF  
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

St Lukes Health System LTD, St  
Lukes Regional Medical Center LTD,  
Chris Roth, Natasha Erickson, MD,  
Tracy Jungman

Plaintiff,

vs.

Ammon Bundy, Ammon Bundy for  
Governor, Diego Rodriguez,  
Freedom Man PAC, Peoples Rights  
Network, Freedom Man Press LLC  
Defendant.

Case No. CV01-22-06789

Protective Order

THIS MATTER, having come before the Court on December 20, 2022 for hearing on Plaintiffs' Motion for Protective Order filed May 11, 2022, the Court finds good cause to grant such motion.<sup>1</sup>

IT IS HEREBY ORDERED that any person, including all Defendants and any agent of any Defendant served with this Order, are prohibited from engaging in the following actions related to this case:

(1) Any person who, by direct or indirect force, or by any threats to a person or property, or by any manner willfully<sup>2</sup> intimidates, threatens or harasses any person because such person has testified or because he<sup>3</sup> believes that such person has testified in this lawsuit may be held in contempt of court.

---

<sup>1</sup> For reasons stated at the hearing, the Court determined it would prepare its own Protection Order rather than signing the proposed order lodged by the Plaintiffs on May 11, 2022.

<sup>2</sup> For purposes of this Order, this Court will apply the definition of "willfully" in Idaho Criminal Jury Instruction 340. An act is done "willfully" when done on purpose. One can act willfully without intending to violate the law or this order, to injure another, or to acquire any advantage.

<sup>3</sup> The Court uses the term "he" in this Order, as the Legislature does in statutes. But the entirety of this Order applies to any person, regardless of gender.




(2) Any person who, by direct or indirect force, or by any threats to a person or property, or by any manner wilfully<sup>4</sup> intimidates, influences, impedes, deters, threatens, harasses, obstructs or prevents a witness, or any person who may be called as a witness, or any person he believes may be called as a witness in this lawsuit from testifying freely, fully and truthfully in this civil proceeding may be held in contempt of court.

The fact that a person was not actually prevented from testifying shall not be a defense to a charge of contempt for the actions in subsections (1) and/or (2) of this Order.

Those that have filed testimony in this matter to date include Chris Roth, Dr. Natasha Erickson, Tracy Jungman, Dr. Jeffrey Erickson, Dr. Jamie Price, Dr. Camille LaCroix, David Barton, William T. Teninty, Jenna Balvin, Sara Berry, Jessica Flynn, John Coggins, Dennis Mesaros, Donna English, William Woods, Abby Abbondandolo, Katy Alexander, Marle Hoff, and Erik Stidham or any associated attorney at HOLLAND & HART LLP. Those who have been identified as a person who may be called as a witness to date include those listed above and also includes Eron Sanchez, Aaron Dykstra, Nice Loufoua, Meridian Police Detective Steve Hanson, Meridian Police Detective Jeff Fuller, Meridian Police Sergeant Christopher McGilver, Meridian Police Officer Sean King, Judge Laurie Fortier, Kelly Shoplock, Joseph Robert Shoplock, Kristen Nate, Roaxanne, Printz, and Kyle Bringhurst. This protection order also applies to any subsequently-disclosed witness(es) as part of the formal discovery process in this case.

This Order is binding upon Diego Rodriguez and Ammon Bundy, and also any officers, agents, and/or employees of Ammon Bundy for Governor, Freedom Man PAC, Peoples Rights Network, and/or Freedom Man Press LLC, and any other person who receives actual notice of this order by personal service or in any manner allowed for service of a complaint or summons in the Idaho Rules of Civil Procedure.

IT IS ORDERED: 1/18/2023 5:55:18 PM

  
\_\_\_\_\_  
Lynn Norton  
District Judge

<sup>4</sup> *Id.*



**CERTIFICATE OF SERVICE**

I certify that on this day I served a copy of the attached to:

Erik F. Stidham                      efstidham@hollandhart.com                       E-mail  
Diego Rodriguez                      freedommanpress@protonmail.com                       E-mail

St Lukes Health System LTD                      Through counsel Erik Stidham

St Lukes Regional Medical Center LTD                      Through counsel Erik Stidham

Chris Roth                      Through counsel Erik Stidham

Natasha D Erickson MD                      Through counsel Erik Stidham

Ammon Bundy                       By E-mail     By mail  
4615 Harvest Lane  
Emmett, ID 83617

Ammon Bundy for Governor                       By E-mail     By mail  
P.O. Box 37  
Emmett, ID 83617

Peoples Rights Network                       By E-mail     By mail  
4615 Harvest Lane  
Emmett, ID 83617

Freedom Man PAC                       By E-mail     By mail  
C/O Diego Rodriguez  
9169 W. State Street, Ste. 3177  
Boise ID 83714

Freedom Man Press LLC                       By E-mail     By mail  
C/O Diego Rodriguez  
1317 Edgewater Dr. #507  
Orlando, FL 32804

Trent Tripple  
Clerk of the Court

Dated: 01/19/2023

By: Janine Korsen  
Deputy Clerk

